

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Honeywell Inc.
13350 US Highway 19 N
Clearwater, Florida 33764
EPA ID: FLD004104105

County: Pinellas
Latitude: 27° 53' 31.054"
Longitude: 82° 43' 23.0087"
Primary NAICS: 334511 - Search, Detection, Navigation, Guidance, Aeronautical, and Nautical System and Instrument Manufacturing
SIC Code: 3812-Search and Navigation Equipment

3) **Responsible Official**

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Senior Health Safety Environmental (HSE) and Facilities Manager
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4) **Inspection Participants**

Parvez Mallick, U.S. EPA, Region 4
Sarah Green, Florida Department of Environmental Protection (FDEP)
Mollie Enck, FDEP
Jeff Gregg, FDEP
Robert Denoux, FDEP
Margaret Pibulldhanapatana, Senior HSE and Facilities Manager, Honeywell Inc.

Dani Gaskin, Senior HSE Engineer, Honeywell Inc.
Sandra Bosque Mendez, Senior HSE Engineer, Honeywell Inc.

5) **Dates of Inspection**

March 30, 2022 9:30 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

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 Compliance Evaluation Inspection**

On March 30, 2022, Sarah M. Green, Mollie Enck, Robert Denoux, and Jeff Gregg of Florida Department of Environmental Protection (FDEP) and Parvez Mallick of the EPA conducted a routine compliance evaluation inspection (CEI) of the Honeywell Inc. (Honeywell or the facility)

to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Honeywell was represented by Margaret Pibulldhanapatana, Dani Gaskin, and Sandra Bosques Mendez during the inspection. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Pall representatives led the inspectors on a tour of the facility operations.

8) Facility Description

Honeywell Inc.'s Clearwater facility is located at 13350 US Highway 19 North in Pinellas County, Florida. The facility manufactures guidance and navigational components, measuring, avionics, and other aviation and aerospace products for commercial, defense, and space industry. Honeywell also tests flight controllers at this facility. Honeywell aerospace products and services are found on virtually every commercial, defense and space aircraft in the world. Honeywell Inc.'s parent company is Honeywell International Inc. In 1999 Honeywell Inc. merged with AlliedSignal to form Honeywell International Inc.

Honeywell occupies seven buildings located on approximately one hundred twenty acres and employs approximately twenty-two hundred employees working in two shifts, Monday through Friday. Water and sewer services are provided by the City of Clearwater and non-contact cooling water comes from the facility wells. Processes which involve the production of hazardous waste materials are small parts cleaning and laboratory operations. Honeywell's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 30, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste. Currently, the facility may generate hazardous waste streams, used oil and universal wastes (such as spent batteries and spent fluorescent lamps), spent solvents, paint waste, and other wastes which include EPA Waste Codes D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D035, D039, D040, F002, F003, F005.

The facility is still conducting monitoring as per a corrective action permit (Permit Number 33908-003-HH) issued under the Hazardous and Solid Waste Amendments (HSWA) following the closure of an incinerator in 1995. The permit was renewed on October 18, 2017 and will expire on December 20, 2027.

9) Previous Inspection History

Honeywell has been inspected by the FDEP numerous times before, most recently on January 8, 2020. No violations were observed during the January 8, 2020, inspection. Honeywell last had an Operation and Maintenance Inspection (OMI) on March 25, 2021. The OMI inspection documented that facility personnel were performing groundwater sampling at the facility in accordance with the FDEP's Standard Operating Procedures for Field Activities (DEP-SOP-001/1).

10) Inspection Findings

The waste sources include process operations, board cleaning, and testing operations. Cleaning can include cleaning of equipment, boards, and equipment parts. All waste from processes is collected in satellite containers located in each processing area. The facility indicated that there are currently sixty-five satellite container locations in the facility. Following the opening conference, the inspection team proceeded with the inspection. The inspectors inspected the following Buildings/Plants during the onsite inspection: Plant #1, Plant #2, Plant #3, Plant #4, and Plant #6, Plant #7, and Plant #8 (less than 90-day storage area/distillation room). Below is a description of the observations made during the inspection.

Plant #1

Plant #1 is a 251,540 ft² area building. The materials and process engineering laboratories are located in the southwest section of Plant #1. A large variety of laboratory chemicals are used and stored in this area. The inspectors did not enter the clean rooms and the beryllium laboratory during the inspection. The satellite accumulation areas (SAAs) of the clean rooms and the laboratory were visible through the clean room windows and the containers appeared closed. The inspectors inspected SAAs of the following laboratories in Plant #1:

MPE Lab

- Two 35-gallon fiberboard containers of isopropyl alcohol (IPA) and methyl ethyl ketone (MEK) waste (EPA waste code D001, D005, D006, D007, D008, D011, D035, F003, and F005) marked “Hazardous Waste” and “Flammable.” The containers were not marked with an indication of the hazards of the contents “Toxic.”

Chemistry Lab

- One closed 35-gallon fiberboard containers of IPA and MEK waste (EPA waste code D001, D005, D006, D007, D008, D011, D035, F003, and F005) marked “Hazardous Waste” and “Flammable.” The container was not marked with an indication of the hazards of the contents “Toxic.” On April 21, 2022, email, the facility sent a photo of the container indicating the nature of the primary and secondary hazards of the contents for the waste container and stated that all IPA and MEK containers were affixed with a new label.
- Four 2.5-gallon containers of flammable liquid marked “Hazardous Waste.” The containers were not marked with an indication of the hazards of the contents “Toxic.” One of the four 2.5-gallon waste containers was open. The container was closed by a facility representative during the inspection (Photograph #1);
- One closed 20-gallon (76-Liter) container of unknown liquid waste (Photograph #2). The inspectors requested that the facility make a waste determination of the contents in the container and manage the waste accordingly. On April 21, 2022, the facility sent an email and a photo stating that the container contained hydrofluoric/nitric acid waste. The container is marked “Hazardous Waste” (D002, D004, D006-D008, and D010).
However, the label failed to indicate an indication of the hazards of the contents.
- One closed 5-gallon container of mercury metal scraps for recycling.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F

(placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704). Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Full SAA containers are sent to Plant #8 for less than 90-day storage area prior to on-site distillation or shipment off-site.

Plant #2

Plant #2 is, a 36,000 ft² area building, primarily used for storage, carpentry shop and a machine shop. The inspectors inspected the following SAA containers in Plant #2:

Carpenter Shop

- One closed 35-gallon container of solvent laden rags marked “Hazardous Waste.” The container was not marked with an indication of the hazards of the contents (Photograph #3).

Maintenance Shop

- Two 35-gallon containers of oil soaked rags;
- One closed 55-gallon container of “Used Oil.”

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Plant #3

Plant #3, is a 101,808 ft² area building, primarily produces circuit and memory boards for aerospace industries. The building also consists of production assembly/tests and optics labs. The SAA containers inspected in Plant #3 included I2 Lab and SMT Lab:

I2 Lab

- One closed 35-gallon fiberboard container marked “Hazardous Waste” and an indication of the hazards of the contents;
- One 1-gallon container of chromate waste marked “Hazardous Waste” and “Corrosive.” The container was not marked with an indication of the hazards of the contents “Toxic”;

- One 2.5-gallon container of corrosive chromate waste marked “Hazardous Waste” and an indication of the hazards of the contents.

SMT D2

- Two closed 35-gallon fiberboard containers marked “Hazardous Waste” and “Flammable.” The containers were not marked with an indication of the hazards of the contents “Toxic”;
- Three 5-gallon containers of solder paste lead for recycling.

B2

One 35-gallon container of Isopropyl Alcohol (“IPA”) marked flammable/toxic and “Hazardous Waste.”

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Plant #4

Plant #4 is a 375,000 ft² area building. Plant #4 houses defense and commercial circuit board electronic assembly and circuit board cleaning area. Failure analysis such as temperature and vibratory testing are also conducted in Plant #4. The following SAA containers were inspected during the inspection:

Commercial M15

- One closed 35-gallon container of production debris waste containing IPA and lead (D001 and D008). The container was marked “Hazardous Waste” and “Flammable” waste an indication of the hazards of the contents. The container was not marked with an indication of the hazards of the contents “Toxic”.

Cosmos R17

- One closed 35-gallon container of production debris waste containing IPA and lead (D001 and D008). The container was marked “Hazardous Waste” and “Flammable” waste an indication of the hazards of the contents. The container was not marked with an indication of the hazards of the contents “Toxic”.

Commercial T22

- One closed 35-gallon container of production debris waste containing IPA and lead (D001 and D008). The container was marked “Hazardous Waste” and “Flammable” waste an indication of the hazards of the contents. The container was not marked with an indication of the hazards of the contents “Toxic” (Photograph #4);
- One 25-gallon container of non-hazardous wastewater from Emerson Branson B950P degreaser machine. 3M™ Novec™ 72DA, non-chlorinated degreaser fluids, is used in the degreaser machine.

Defense D13

- One closed 35-gallon container of non-hazardous production debris containing gloves and epoxy syringes.

Defense D12

- One closed 35-gallon container of non-hazardous production debris containing gloves and epoxy syringes.

Defense E11

- Three closed 2.5-gallon containers of acetone waste marked “Flammable” and “Hazardous Waste.” The containers were not marked with an indication of the hazards of the contents “Toxic” (Photograph #3);
- One closed 2.5-gallon container of spent IPA. The facility representative indicated the IPA waste is generated from the bonding and coating process. The spent IPA is reused in the wave shutter machine located in room Defense I13. Once the IPA used in room I13 is spent then it is managed as hazardous waste.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Plant #5

Plant #5 was sold approximately twelve years ago and is no longer part of Honeywell’s facility.

Plant #6

In Plant #6 is a 16,000 ft² area building. This building is used as an environmental test facility: Thermal, Vibration, Radiation, Pyrotechnic. Equipment in this area, such as the cooling vacuum, generates used oil. The following SAA containers were observed during the inspection:

- One closed 5-gallon container marked “Used Oil”;
- One 2.5-gallon container of IPA waste marked “Hazardous Waste” and “Flammable.” The container was not marked with an indication of the hazards of the contents “Toxic”.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Plant #7

Plant #7 is used as the Stock Inventory Area. No hazardous wastes were observed in this building during the inspection.

Plant #8 - Central Accumulation Area (CAA)

Plant #8 is used for storage of less than 90-day hazardous waste (Photographs #5-6), non-hazardous waste, and virgin chemical containers. Plant 8 is also part of solvent recycling system. The distilled solvent is reused in the facility. The following hazardous waste containers were stored in the CAA:

- One closed 35-gallon container marked corrosive “Hazardous Waste”;
- Nineteen closed 35-gallon containers marked flammable solid “Hazardous Waste”;
- Ten 35-gallon containers marked flammable liquid “Hazardous Waste.” The containers were not marked with an indication of the hazards of the contents “Toxic”;
- One 35-gallon container of “Hazardous Waste.” The containers were not marked with an indication of the hazards of the contents;
- Two 55-gallon containers marked flammable liquid “Hazardous Waste”;
- One 55-gallon container of “Used Oil”;
- Three 35-gallon containers of non-hazardous waste; and
- One 55-gallon container of non-hazardous waste.

The earliest start accumulation date of the hazardous waste container was February 28, 2022, less than 90-day storage limit.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(A-C)], which is a condition of the LQG Permit Exemption, Pall must mark or label container of paint booth filters with the following: (B) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e. toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Universal waste lamps are normally stored in the CAA. However, at the time of the inspection, the facility had a recent pickup and had none currently on site. The facility is in the process of switching to LED lighting.

Records Review

Following the facility’s tour, the EPA and FDEP proceeded with records review. The records review included hazardous waste manifests, land disposal restriction (LDR) records, universal waste manifests, weekly inspection logs, waste minimization plan, personnel training documents, contingency plan, waste profiles, and biennial report.

Hazardous waste is shipped out on a bi-monthly schedule by Freehold Cartage (NJD054126164) with a final destination of Tradabe Treatment and Recycling of TN (TND000772186).

Honeywell ships out approximately 3,000-4,000 pounds of hazardous waste per bi-monthly. Manifest records for the last three years were available for review at the time of the inspection and appeared to be signed and complete. Universal waste lamps are picked up by US Ecology (FLD981932494) for recycling once or twice a year. Scrap metal recycling goes to Electrum or UniShipper, depending on pricing.

Hazardous waste training records were provided to FDEP and reviewed electronically shortly following the inspection. Training is completed annually in-house and included DOT shipping information and facility specific RCRA and other waste handling procedures.

The weekly inspection log records were reviewed electronically shortly following the inspection. The records appeared timely and accurate with all required information.

The facility's Emergency Management Plan was available instead of a RCRA Hazardous Waste Contingency Plan (CP) for review at the time of the inspection. The EPA recommends that the CP be based on the National Response Team's Integrated Contingency Plan Guidance ("One Plan"). The Emergency Management Plan reviewed during the inspection lacked new emergency coordinators name and contact information. The facility did not have a quick reference guide (QRG) during the inspection. In addition, Honeywell could not provide documenting arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility during the inspection. The inspectors stated that the proof of distribution of CP and QRG must be retained on-site.

On April 11, 2022, Honeywell emailed an updated Emergency Management Plan and QRG to Pinellas County Sheriff's Office, Largo Fire Rescue, Concentra Urgent Care, Tampa Bay Regional Planning Council, and Bradmoor Emergency Center. Honeywell emailed an updated Emergency Management Plan and QRG to FDEP on April 21, 2022.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) the list of emergency coordinators changes.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261(c)], and is a condition of the LQG Permit Exemption, (c) the plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to § 262.256.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)(a)(1-5)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

RCRA hazardous waste trainings records were reviewed for Sandra Bosques Mendez, Hunter Scheiderer, Margaret Pibuladhanapatana, Dani Gaskin, and Seaton Coke. The following staff were missing training records:

- Hunter Scheiderer—year 2019 and 2020;
- Seaton Coke—year 2019, 2020, and 2021; and
- Sandra Bosques Mendez—2019.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(i)(A-B)], and is a condition of the LQG Permit Exemption, the large quantity generator facility personnel: (A) must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. The large quantity generator must ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section; and (B) this program must be directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

Ms. Margaret Pibulldhanapatana and Mr. Dani Gaskin recently joined Honeywell's Health Safety Environmental (HSE) and Facilities. Both are listed as emergency coordinators for the facility. As per 40 C.F.R. § 262.264, an emergency coordinator must be thoroughly familiar with all aspects of the generator's contingency plan, all operations and activities at the facility, the location and characteristics of hazardous waste handled, the location of all records within the facility, and the facility's layout.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(ii)], which is a condition of the LQG Permit Exemption, a facility personnel must successfully complete the program required in paragraph (a)(7)(i) of this section within six months after the date of their employment or assignment to the facility, or to a new position at the facility, whichever is later. Employees must not work in unsupervised positions until they have completed the training standards of paragraph (a)(7)(i) of this section. Ms. Pibulldhanapatana and Mr. Gaskin must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. The large quantity generator must ensure that this program includes all the elements described in the document required under paragraph 40 C.F.R. § 262.17(a)(7)(iv).

The inspectors reviewed RCRA job description positions for Honeywell employees dealing with management of hazardous waste. The job descriptions did not include the name of the person filling the position nor the requisite skill, education, or other qualifications and trainings needed for the positions. Honeywell must provide job description for each position, written description of the type and amount of both introductory and continuing training that will be given to each person filling the position, records that document that the training or job experience has been given to, and completed by, facility personnel.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iv)(B-D)], and is a condition of the LQG Permit Exemption, the large quantity generator must maintain the following documents and records at the facility: (B) a written job description for each position listed under paragraph (a)(7)(iv)(A) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; (C) a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (a)(7)(iv)(A) of this section; and (D) records that document that the training or job experience, required

under paragraph (a)(7)(i), (ii), and (iii) of this section, has been given to, and completed by, facility personnel.

The FDEP records indicated that the 2021 biennial report was submitted by Honeywell electronically before April 1, 2022, as required.

11) Closing Conference

A closing conference was conducted at the conclusion of the inspection. The observations made during the inspection were discussed and the inspection was concluded. Honeywell was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. On April 21, 2022, Honeywell submitted documents indicating corrective actions taken at the facility regarding container management and records keeping deficiencies.

12) Signed

**PARVEZ
MALLICK**

Digitally signed by
PARVEZ MALLICK
Date: 2022.05.26
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Parvez Mallick
Inspector and Author of Report

Date

13) Concurrence and Approval

**ARACELI
CHAVEZ**

Digitally signed by
ARACELI CHAVEZ
Date: 2022.05.26 16:26:38
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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

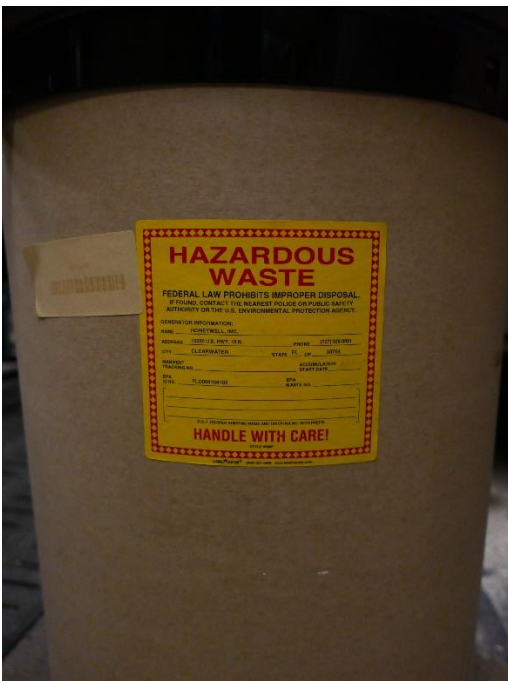
Compliance Evaluation Inspection photographs were taken by Parvez Mallick of EPA
Canon PowerShot SD980 IS - EPA Property Number S75319



Photograph #1 – Four 2.5-gallon containers of flammable waste and open container.



Photograph #2 – 20-gallon container of unknown waste. Waste determination indicated that it was hazardous waste.



Photograph #3 – 35-gallon container solvent laden rags without hazard indication label.



Photograph #4 – 35-gallon container of debris without hazards of the contents "Toxic" label.



Photograph #5 – 90-day hazardous waste storage area.



Photograph #6 – 90-day hazardous waste storage area.