

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

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3) Responsible Officials

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4) Inspection Participants

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5) Date of Inspection

December 5, 2022, at 9:10am

6) **Applicable Regulations**¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 – 270, 273, 278, & 279; Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 et seq., and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

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 any 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. § 262.17], 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 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-.07(1) [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

¹ As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions 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 Parker Meggitt (hereinafter, “Meggitt” or the “facility”) compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) **Facility Description**

Meggitt owns and operates a rubber manufacturing facility in Polk County, Georgia. The facility has an approximate total area of 55 acres, of which 750,000 square feet is underroof manufacturing. Currently, 961 employees work at the facility. Access to the facility was controlled through the security gate towards the intersection of Goodyear Avenue and 1st Avenue.

The facility is a Large Quantity Generator with their latest notification dated May 12, 2022. Hazardous wastes generated at the facility include, but are not limited to, the EPA waste codes D001, D002, D007, D030, D035, F001, F003, F005, F006. Meggitt’s Title V permit (3069-233-0020-V-04-0) was issued on July 25, 2019; a Title V Air Permit modification was issued June 3, 2021 for the inclusion of five (5) new boilers replacing two (2) existing boilers and the replacement of an existing spray booth (SB02). Meggitt also has a stormwater permit (GA0000523). The NAICS Numbers for this facility are 326299 - All Other Rubber Manufacturing and 336413 – Other Aircraft Parts and Auxiliary Equipment Manufacturing.

This facility manufactures aerospace products including rubberized aircraft fuel tanks (fuel bladders), aircraft ice protection systems, aircraft upholstery panel and other elastomer-coated fabric products including non-aerospace products like oil booms and ground vehicle fuel tanks. The elastomer coated products are formed using adhesives, coatings, textile pieces, and pre-made fittings. The facility manufactures most of the adhesives and coating used on-site. Raw materials for the adhesives/coatings are received and stored either in small bulk storage tanks, totes or smaller containers. Adhesives and coatings are prepared in mix vessels or in batch reactors. VOC and HAP emissions from the mixing vessels and batch reactors are uncontrolled. Currently, the majority of the coatings manufactured on-site are used on site to support aerospace manufacturing with the remainder being sent offsite as repair kits and sealants for aircraft fuel tanks. Elastomer-coated products are generally formed over cardboard or plaster forms that are coated with a water-based mold release agent in one of two spark booths. Workers, hand-layer textiles and coatings/adhesives over the form in one of the many open work areas. Fittings and other hardware are integrated into the product during the buildup of the product. The majority of the VOC and HAPs from the facility are emitted from the hand application of adhesive/coating and spray application in spray booths (SB01 - SB06). After the coatings have cured, workers break the plaster or cardboard form and extract the pieces of the form. Fuel tanks are cleaned, inspected, and packaged for shipment. Iceguard, ice protection systems are manufactured using “pre-preg” fiberglass mat, which are formed over jigs that are vacuumed sealed and cured in an autoclave. The rough fiberglass piece is finished to final shape and heating wires are embedded in the leading edges of aircraft piece to prevent ice formation. Soldering is conducted to connect the wires. Iceguard specialty coatings are applied in spray booths SB07 and SB10. The aircraft

upholstery operation applies flamer-resistant fabrics over rigid panels, using fasteners and adhesives. All Iceguard and upholstery operations are performed in the Composite Building. Building 1 consists of the fuel bladders. Building 2 consists of the forms for the fuel bladders. Building 14 consists of the Mix Center with the urethane products. Building 29 consists of the touchups on the fuel bladders. Building 21 consists of the manufacturing of composite parts. The hazardous waste that is being generated in these buildings is primarily derived from excess urethane from trimming and cleaning solvents rags.

9) **Previous Inspection History**

Georgia Department of Natural Resources, Environmental Protection Division (GAEPD) has conducted one RCRA CEI at the subject facility between 2017 and 2022. On May 23, 2017, the GAEPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) **Opening Conference**

On December 5, 2022, EPA inspectors Mark Anthony Relon and Brooke York, accompanied by GAEPD inspectors Summer Smith and Sara Porter, arrived at Meggitt at approximately 9:10am. A security guard from the visitor center informed us to enter through the other side of the facility to a security guard shack where they asked for our credentials and required us to electronically sign in. Tawana Turner, Manager Health, Safety & Environmental, immediately received the inspectors after approximately 30 minutes of waiting for the right personnel, and the inspectors did not sign Meggitt's electronic non-disclosure sign-in sheet. Tawana Turner and the inspectors were joined by Mark Fennell and Paul Wiggins, for the opening conference. The inspectors introduced themselves, showed their credentials to Tawana Turner, Mark Fennell, and Paul Wiggins, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Tawana Turner and Mark Fennell provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) **Inspection Observations**

Building 14

Mix Center

Meggitt manages a Satellite Accumulation Area (SAA) in their Mix Center for managing hazardous waste flammable liquids and trash (Figures 1-2) that are generated by the mixing of actine, toluene (also known by the facility as Robine), and methyl ethyl ketone (MEK). The inspectors observed two 55-gallon containers and four 5-gallon containers in this SAA (Figure 3). The containers were located by a staircase near the small mixers that mixed the actine, Robine, and MEK. One of the 55-gallon containers was equipped with a funnel, which was not closed. The container was labeled D001, D035, F003, F005 hazardous waste “RQ, Waste Flammable Liquids (contains MEK, Toluene),” and identified with a Department of Transportation (DOT) flammable placard. The second 55-gallon container was equipped with a drum cover, which was not closed. The container was labeled D035 hazardous waste “trash contaminated with MEK,” and identified with a DOT flammable placard. Two 5-gallon containers contained expired product awaiting placement in the 55-gal SAA containers; the other two 5-gallon containers contained unexpired product for use.

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.

Reactor Room

On the first floor of the Reactor Room, Meggitt manages a SAA for managing hazardous waste flammable liquids and trash that are generated by two 150-gallon reactors (R-211 and R-212) on the second floor. In the Reactor Room, the inspectors observed a total of four 55-gallon containers and one 3-gallon container. Two 55-gallon containers were used for the reactors (Figures 7 and 9), one 55-gallon container was stored Amidol solvent, referred to the facility as “Boil out” (Figure 6), one 55-gallon container for “trash contaminated with MEK” (Figure 4), and one 3-gallon container for parts washing (Figure 5). The two containers under the reactors were equipped with a funnel, which were not closed. The two containers under the reactors were labeled D001, D035, F003, F005 hazardous waste “RQ, Waste Flammable Liquids (contains MEK, Toluene),” and identified with a DOT flammable placard (Figure 8 and 10).

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.

The container storing Amidol solvent was closed, labeled “Boil out” only and identified with a DOT flammable placard. Inspectors asked facility personnel what the stored Amidol was used for. Facility personnel stated that the stored Amidol was for their reused solvent process for cleaning reactors R-211 and R-212. The Amidol is reused approximately 3-4 times before it is

discarded; therefore, a drum was stored near the reactors for reuse. The reactors are cleaned bi-weekly to monthly depending on the frequency of use. Inspectors asked facility personnel to provide their standard operating procedures of the stored Amidol for review. During the records review, inspectors evaluated their standard operating procedure (SOP) for the stored Amidol. After comparing the SOP and the observations during the inspection, inspectors recommended facility, follow its SOP, which required personnel to label stored Amidol solvent containers as “Solvent for Reuse” and better document the number of times it has been used.

The 55-gallon container for trash contaminated with MEK was equipped with a drum cover, which was not closed. The container was labeled D035 hazardous waste trash contaminated with MEK and identified with a DOT flammable placard.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Lab Room

The facility manages a SAA in their Lab Room for managing hazardous waste flammable liquids and trash that is generated by lab sampling. The inspectors observed two 55-gallon containers in this SAA (Figures 11 and 13). One container was located inside a flammable cabinet and the other container adjacent to the flammable cabinet. One of the 55-gallon containers was equipped with a funnel, which was not closed. The container was labeled D001, D035, F003, F005 hazardous waste “RQ, Waste Flammable Liquids (contains MEK, Toluene),” and identified with a DOT flammable placard (Figure 12). The other 55-gallon container was equipped with a drum cover, which was not closed. The container was labeled D035 hazardous waste “trash contaminated with MEK,” and identified with a DOT flammable placard (Figure 14).

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.

Quality/Development Lab

The facility manages a SAA in their Quality/Development Lab for managing hazardous waste flammable liquids and trash that is generated by quality assurance and lab sampling. The inspectors observed two 55-gallon containers in this SAA (Figures 15 and 17). One container was located inside a flammable cabinet and the other container near the flammable cabinet. One of the 55-gallon containers was equipped with a funnel, which was not closed. The container was labeled D001, D035, F003, F005 hazardous waste “RQ, Waste Flammable Liquids (contains MEK, Toluene),” and identified with a DOT flammable placard (Figure 18). The other 55-gallon container was equipped with a drum cover, which was not closed. The container was labeled D035 hazardous waste “trash contaminated with MEK,” and identified with a DOT flammable

placard (Figure 16).

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.

Building 2

This area consists of material processing and cardboard forms to shape products. No hazardous waste is generated in this area. The inspectors observed two 55-gallon containers in this area.

Building 1

String Fittings Area

The facility manages a SAA in their String Fittings Area for managing empty aerosol cans that is generated by providing protective film on the plastic forms. The inspectors observed one 55-gallon container in this SAA (Figures 19 and 20). The 55-gallon container was equipped with a drum cover, which was closed. The container was not labeled and not identified with an indication of hazard.

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.

Crashworthy Build Area

The facility manages a SAA in their Crashworthy Build Area for managing hazardous waste flammable liquids, solids, and trash that is generated by the production of their fuel bladders. The inspectors observed four 55-gallon containers in this SAA (Figure 21). Three containers were located inside flammable cabinets and the fourth container near the flammable cabinets. The 55-gallon container inside the flammable cabinet labeled “Liquid Waste” was equipped with a funnel, which was not closed. The container was labeled D001, D035, F003, F005 hazardous waste “RQ, Waste Flammable Liquids (contains MEK, Toluene),” and identified with a DOT flammable placard. The 55-gallon container inside the flammable cabinet labeled “Nylon” was equipped with a funnel, which was not closed. The container was labeled D035 hazardous waste “trash contaminated with MEK,” and identified with no indication of hazard. The 55-gallon container inside the flammable cabinet labeled “Nylon Waste Only” was equipped with a funnel, which was not closed. The container was labeled D001 hazardous waste code and identified with a DOT flammable placard. The 55-gallon container adjacent to the flammable cabinets was equipped with a drum cover, which was not closed. The container was labeled hazardous waste “Solids” with no indication of hazard.

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.

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.

The inspectors observed one 50-gallon container of used solvent contaminated reusable wipes in the Crashworthy Build Area (Figures 22-24). The container was closed, and it was not labeled “excluded solvent contaminated wipes.”

Meggitt did not provide any records for shipments of solvent-contaminated wipes being sent off-site for laundering or dry-cleaning. Meggitt provided documentation of the name (Cintas), but not the address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day time limit in Ga. Comp. R. and Regs 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)(ii)] is being met; or a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.

Spray Booth

The Spray Booth is located on the second floor of Building 1. The facility manages a SAA outside their Spray Booth for managing hazardous waste flammable liquids that is generated by the Spray Booth. The inspectors observed two 5-gallon containers left open, with no hazardous waste label or indication of hazard (Figure 25). The 5-gallon containers capture waste coming from the Spray Booth that is then sent to the SAA outside the Spray Booth. The inspectors observed one 55-gallon container in this SAA. The container was located inside a flammable cabinet. The 55-gallon container was equipped with a funnel, which was not closed. The container was labeled D001, D035, F003, F005 hazardous waste “RQ, Waste Flammable Liquids (contains MEK, Toluene),” and identified with a DOT flammable placard.

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.

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.

Facility personnel stated that the 5-gallon containers are dumped daily; facility personnel also

stated filter changes for the Spray Booth occurred weekly. Inspectors asked for waste profiles on the filters in both spray booths within Building 1 and Building 21. During the records review, facility personnel provided waste profiles for the Spray Booth within Building 1. On December 14, 2022, facility personnel provided through email stating “Building 1 spray booth waste determined by 5/16/2019 TCLP results. No waste determination for Building 21 spray booth filters for non-chromium use spray booth. Based off of generator knowledge, the filters are included with general waste. Waste profiles were provided during the visit for the filters that contain chromium. Those filters are disposed of as hazardous waste.”

Building 29

Completion Center

This area consists of the product after the cardboard forms are removed. Fixtures are checked within the product for perfect fittings and are hand wiped for cleaning. The inspectors observed one 50-gallon container of used solvent contaminated reusable wipes in the Completion Center (Figure 26). The container was closed, and it was not labeled “excluded solvent contaminated wipes.”

Meggitt did not provide any records for shipments of solvent-contaminated wipes being sent off-site for laundering or dry-cleaning. Meggitt provided documentation of the name (Cintas), but not the address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day time limit in Ga. Comp. R. and Regs 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(26)(ii)] is being met; or a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.

90 Day Storage Area [Central Accumulation Area (CAA)]:

Meggitt manages a hazardous waste CAA in the 90 Day Storage Area (Figures 27-30). This area is separate from the main facility, designated outside and covered with an overhead roof with secondary containment. Universal waste batteries are stored in the Batteries Storage Area within the CAA (Figure 39). The inspectors observed one 55-gallon container and one 35-gallon container labeled “Used Batteries for Recycle.” There was no accumulation start dates for these containers.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

The area was identified with a sign which read “danger, hazardous waste storage.” Meggitt manages ignitable waste in this CAA, and the inspectors observed “No Smoking” signs just outside its entrance (Figure 42). Inspectors observed hazard assessment certifications posted on the wall (Figures 40-41).

The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system (Figure 42).

Inspectors observed a total of two hundred fifteen (215) 55-gallon containers. In the center of the CAA were thirty-two (32) 55-gallon containers recently brought from the facility's operations/waste generated (Figure 29). The 32 containers were not included in the last weekly inspection but included in the drum count. Seven 55-gallon containers did not have an accumulation start date (Figure 31-36, 38). Multiple instances of 55-gallon containers stacked on top of other containers appeared to have no indication of hazards (Figure 30). One 55-gallon container appeared to have an updated label that did not appear to be legible (Figure 37). The oldest accumulation date at the time of the inspection was dated November 8, 2022.

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: 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.

Building 21

Acid Wash Station

Meggitt manages a SAA in the Acid Wash Station for managing hazardous waste corrosive liquids that is generated by aluminum etching (Figure 43). The inspectors observed one 30-gallon container that appeared to be full in this SAA. The drum was connected to the aluminum etching machine, which was not secure. The container was labeled D002 "RQ Waste Corrosive Liquids, Acidic, Inorganic," and identified with a DOT corrosive placard.

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.

Spray Booth 7

The facility manages a SAA outside Spray Booth 7 for managing hazardous waste chromium that is generated by the spray booth (Figure 45). The inspectors observed one 55-gallon container located outside the spray booth, equipped with a drum cover, which was closed (Figure 44). The container was labeled D007 hazardous waste "wipes, brushes contaminated with Chromium," and identified with no indication of hazard. The inspectors observed a vacuum in this SAA. The vacuum was covered over a plastic sheet and labeled "For Use in Chrome Spray Booth Only"

(Figure 46-47). The vacuum did not appear to have a hazardous waste label and did not have an indication of hazard. The inspectors observed one 55-gallon container located outside the spray booth, equipped with a funnel, which was not closed (Figure 48). The container was labeled D035, D001, F003, F005 hazardous waste “RQ, Waste Flammable Liquids (contains MEK, Toluene),” and identified with a DOT flammable placard. On December 14, 2022, facility personnel provided through email stating “On 5/16/2019, a TCLP was performed on a solid waste sample from building 1. The solid waste sample, KC 135, contains product that are found on the spray booth filter of building 1 as well as the paper flooring. TCLP results included in attachment.” After review of the documents, TCLP results do not appear to be representative to distinguish or identify the waste stream in question.

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.

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. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Spray Booth 8

The facility manages a SAA outside Spray Booth 8 for managing hazardous waste MEK and polyurethane that is generated by the spray booth. The inspectors observed one 55-gallon container located outside the spray booth which was closed (Figure 49). The container was labeled D035 hazardous waste solids (trash contaminated with MEK) and identified with a DOT flammable placard. The spray booth filters are replaced weekly. Inspectors asked facility personnel for a waste profile on the spray booth filters. On December 14, 2022, facility personnel provided through email stating “No waste determination for Building 21 spray booth filters for non-chromium use spray booth. Based off of generator knowledge, the filters are included with general waste.”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Inspectors observed the floor covered with paper to capture dripping paint from painted products (Figure 50). Inspectors asked facility personnel if Meggitt has made a waste determination for

the paper flooring. On December 14, 2022, facility personnel provided through email stating “On 5/16/2019, a TCLP was performed on a solid waste sample from building 1. The solid waste sample, KC 135, contains product that are found on the spray booth filter of building 1 as well as the paper flooring. TCLP results included in attachment.” After review of the documents, TCLP results do not appear to be representative to distinguish or identify the waste stream in question.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Multiple instances of SAA containers with funnels not being closed or not secure was an area of concern. Inspectors recommended facility personnel to change funnels that provide a better seal and will properly close and secure the container.

Contingency Plan:

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan does not describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee. On December 14, 2022, facility personnel provided through email stating “The local fire department that is in the adjacent building frequently tour the facility. However, there are no record of arrangements with local authorities. There is an onsite emergency response team, including first responders, incipient fire brigade and hazmat spill response team. For any events beyond the team’s scope/training, local authorities will be called in utilizing emergency numbers as needed.”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for Cement Operator, Facilities Manager, Forklift Operator/Floor Worker, Health Safety and Environment Manager, Production Team Supervisor. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. The job descriptions specifically address or describe hazardous waste management duties of the position. On December 14, 2022, facility personnel provided job descriptions via email including the names of employees filling the positions.

Meggitt provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2020, 2021, 2022.

Waste Manifest Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2020. Hazardous waste manifest records show that D001, D007, D035, F003, F005 hazardous waste Flammable liquids (Toluene, MEK), D007 hazardous waste Flammable solids (Chrome) are routinely shipped to Clean Earth of Alabama (EPAID: ALD981020894), and the most recent shipment was made on December 2, 2022.

The facility's records did not include a signed return copy of hazardous waste manifest number 006255602GBF, 006255604GBF, and 006255605GBF for shipments of D001, D007, D035, F003, F005 hazardous waste Flammable solids (Chrome) and Flammable liquids (toluene, MEK) to Clean Earth of Alabama (EPAID: ALD981020894) on September 16, 2022, October 13, 2022, and November 4, 2022. Records were provided to show that Meggitt contacted the transporter or the owner or operator of the designated facility to determine the status of this waste. However, Meggitt did not submit exception reports for manifest number 0062555906GBF shipped April 1, 2022 and received June 2, 2022.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.42(a)(2)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in §261.31 or §261.33(e) in a calendar month, must submit an Exception Report to the EPA Regional Administrator for the Region in which the

generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Inspection Records:

The inspectors reviewed Meggitt's available records of inspections of the hazardous waste central accumulation area (CAA) since 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations such as aisle space, labeling of containers, containers compatible with waste, closed lids and bungs, emergency communication, spill response kit, etc. The records include the date of the inspection and the name of the employee conducting the inspection. Each week, the employee records notations of observations and necessary follow-up actions for the inspected areas. Inspection records were provided for the week(s) of November 21, 2022, and November 28, 2022.

12) Closing Conference

The inspectors conducted the exit meeting at 5:53pm with Mike Viscosi, Eric Bridges, Tawana Turner, and Mark Fennell. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Meggitt agreed to provide requested information as soon as possible. On December 14, 2022, Tawana Turner provided weekly inspection logs, position descriptions, and waste determinations in an email to Mark Anthony Relon and Brooke York.

13) List of Appendices

Appendix 1 – Photo Log:

50 Photos taken on: December 5, 2022

Photos taken by: Brooke York

Photos taken with: Canon Power Shot ELPH 180

14) Signed

MARK ANTHONY
RELON

Digitally signed by MARK
ANTHONY RELON
Date: 2023.02.22 16:39:21 -05'00'

Mark Anthony Relon
Environmental Engineer

BROOKE YORK

Digitally signed by BROOKE
YORK
Date: 2023.02.27 09:54:56 -05'00'

Brooke York
Environmental Engineer

Concurrence

ARACELI
CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.02.27 10:58:19
-05'00'

Araceli B. Chavez
RCRA Enforcement Section

Appendix 1
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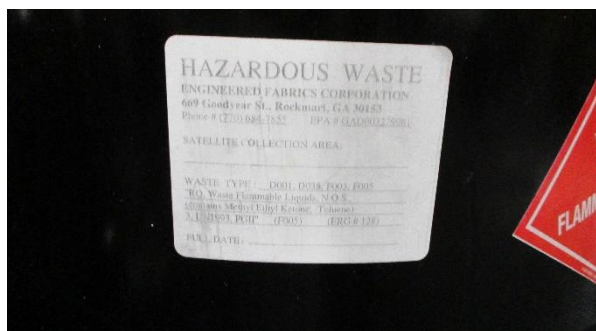


Figure 1: 11:05 AM Building 14 - Mix Center

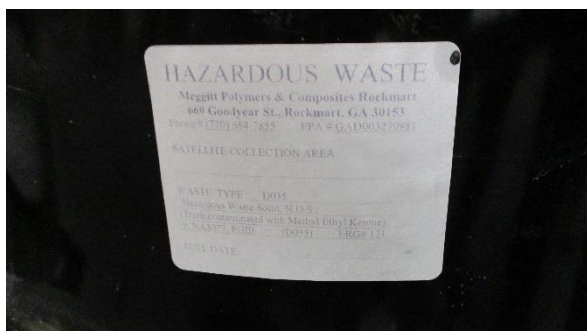


Figure 2: 11:05 AM Building 14 - Mix Center



Figure 3: 11:06 AM Building 14 - Mix Center



Figure 4: 11:16 AM Building 14 - Reactor Room



Figure 5: 11:16 AM Building 14 - Reactor Room



Figure 6: 11:26 AM Building 14 - Reactor Room

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Figure 7: 11:26 AM Building 14 - Reactor Room



Figure 8: 11:26 AM Building 14 - Reactor Room



Figure 9: 11:27 AM Building 14 - Reactor Room

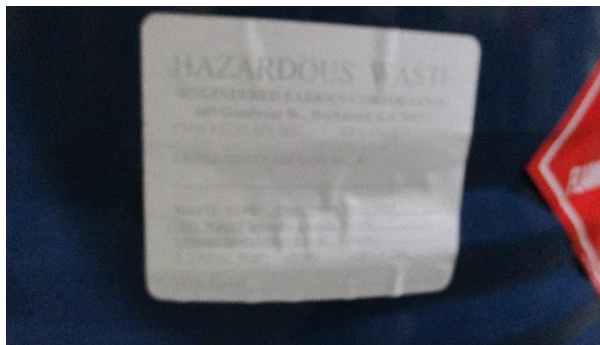


Figure 10: 11:27 AM Building 14 - Reactor Room

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Figure 11: 11:31 AM Building 14 – Lab Room

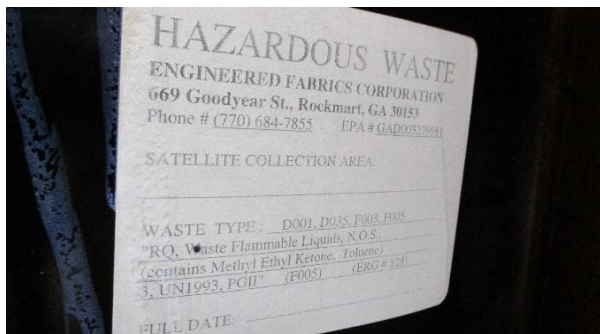


Figure 12: 11:31 AM Building 14 – Lab Room



Figure 13: 11:32 AM Building 14 – Lab Room

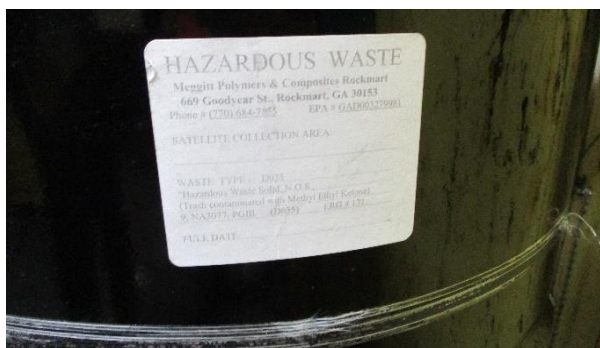


Figure 14: 11:32 AM Building 14 – Lab Room

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Figure 15: 11:37 AM Building 14 -
Quality/Development Lab

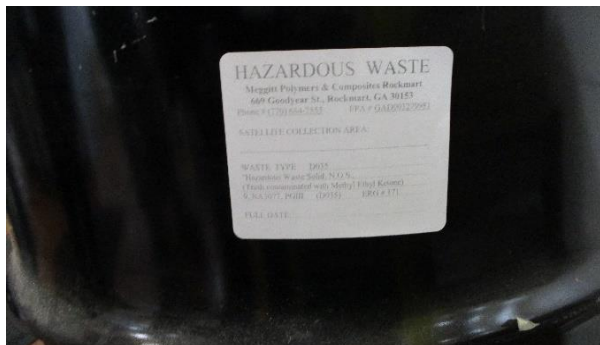


Figure 16: 11:37 AM Building 14 -
Quality/Development Lab



Figure 17: 11:37 AM Building 14 -
Quality/Development Lab

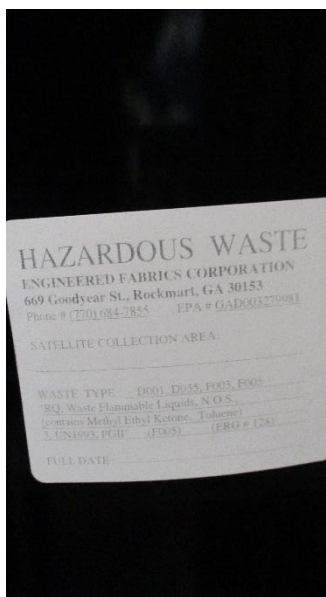


Figure 18: 11:37 AM Building 14 -
Quality/Development Lab

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Figure 19: 11:55 AM - Building 1 - String Fittings Area



Figure 20: 11:55 AM - Building 1 - String Fittings Area



Figure 21: 11:58 AM - Building 1 - Crashworthy Build Area



Figure 22: 12:12 PM - Building 1 - Crashworthy Build Area

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Figure 23: 12:12 PM - Building 1 - Crashworthy Build Area



Figure 24: 12:12 PM - Building 1 - Crashworthy Build Area



Figure 25: 12:19 PM - Building 1 - Spray Booth



Figure 26: 1:48 PM Building 29 - Completion Center

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Figure 27: 1:54 PM 90 Day Storage Area



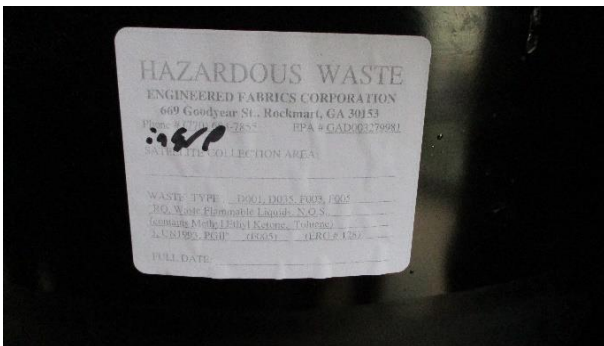
Figure 28: 1:54 PM 90 Day Storage Area



Figure 29: 1:55 PM 90 Day Storage Area



Figure 30: 1:56 PM 90 Day Storage Area



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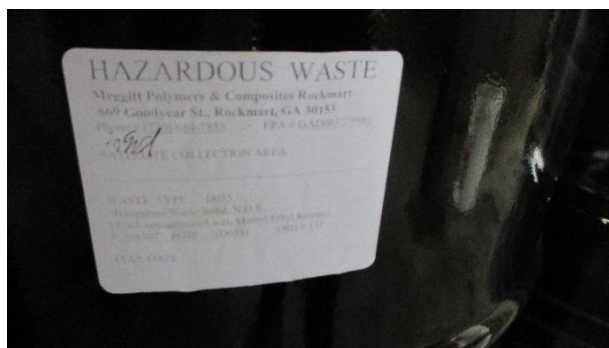


Figure 33: 2:05 PM 90 Day Storage Area

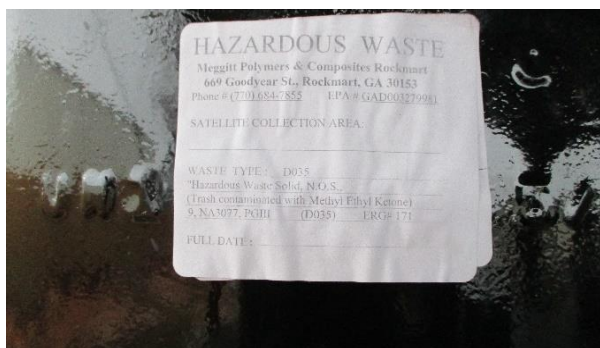


Figure 34: 2:08 PM 90 Day Storage Area

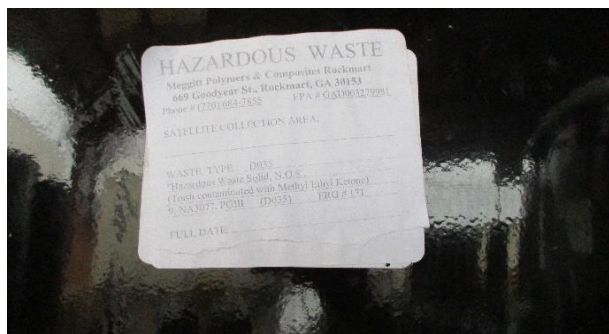


Figure 35: 2:08 PM 90 Day Storage Area

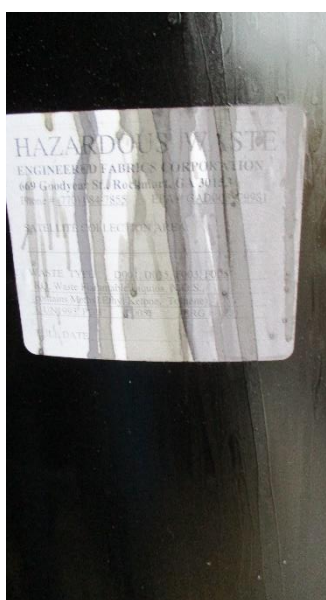


Figure 36: 2:09 PM 90 Day Storage Area

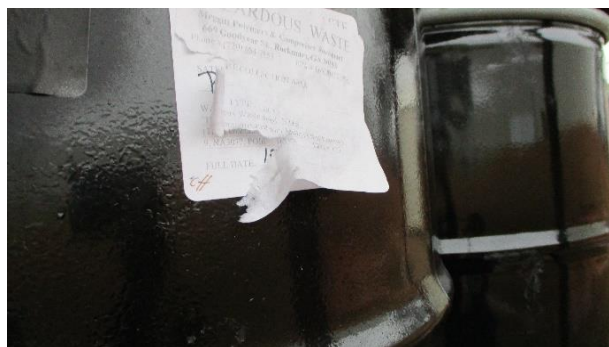


Figure 37: 2:10 PM 90 Day Storage Area

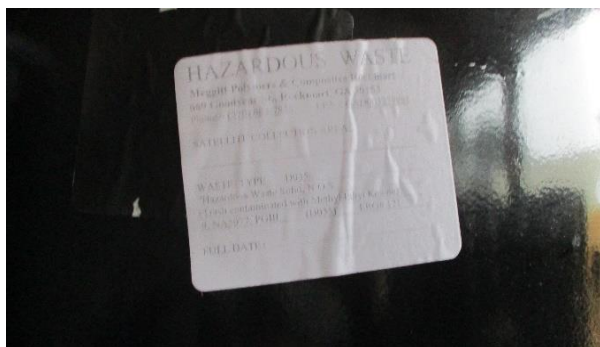


Figure 38: 2:10 PM 90 Day Storage Area

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Figure 39: 2:14 PM 90 Day Storage Area



Figure 40: 2:14 PM 90 Day Storage Area

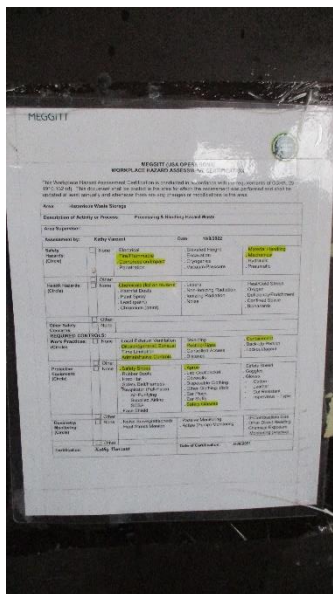


Figure 41: 2:15 PM 90 Day Storage Area



Figure 42: 2:17 PM 90 Day Storage Area

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Figure 43: 2:25 PM Building 21 - Acid Wash Station



Figure 44: 2:30 PM Building 21 - Spray Booth 7



Figure 45: 2:31 PM Building 21 - Spray Booth 7



Figure 46: 2:32 PM Building 21 - Spray Booth 7

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Figure 47: 2:32 PM Building 21 - Spray Booth 7



Figure 48: 2:33 PM Building 21 - Spray Booth 7



Figure 49: 2:45 PM Building 21 - Spray Booth 7



Figure 50: 3:05 PM Building 1