RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Piper Aircraft Inc.
2926 Piper Dr.
Vero Beach, Florida 32960
Indian River County

EPA ID No. FLD004054284
Latitude: 27° 38' 57.421"
Longitude: 80° 24' 54.7188"
NAICS Code: 336411 – Aircraft Manufacturing
SIC: 3721 – Aircraft Manufacturing
Website: https://www.piper.com

3) Responsible Officials

Stacy Gordon, PE
Senior Manager
Environmental Health and Safety
Piper Aircraft Inc.

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4) Inspection Participants

Johanna Polycart, Florida Department of Environmental Protection (FDEP)
Susan Bryan, FDEP
Kaitlyn Taylor, FDEP
Jeff Gregg, FDEP
Stacy Gordon, Environmental Health and Safety, Piper Aircraft Inc.

Parvez Mallick, U.S. Environmental Protection Agency, Region 4

5) Date of Inspection

March 8, 2023, 10:30 a.m.

6) Applicable Regulations[1]

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 (F.A.C.), Chapters 62-710, 62-730 and 62-750.

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 total of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 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).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Piper Aircraft Inc. facility's compliance with the applicable requirements of

[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.

RCRA and the corresponding State of Florida regulations. This was an EPA and FDEP joint inspection.

8) Facility Description

Piper Aircraft Inc. ("Piper" or "the facility") is a manufacturer of small aircraft designed for use by individuals, trainers, and corporations. The facility manufactures the body of the aircraft and purchases the power plant and electronics from outside sources. Most of the processes are metalworking, fiberglass and plastic parts production, and painting. Piper's Vero Beach, Florida, campus is where all Piper aircrafts are designed, engineered, and built. Aircraft models produced at this facility include the M-Class, formerly known as Malibu (business aircraft models M600/SLS, M500, and M350; and personal aircraft models M500, M350, Archer LX, and Archer DLX) and C-Class, formerly known as Cherokee (trainer models Seminole, Archer TX, Archer DX, and Pilot 100i). Piper manufactures approximately 200 planes per year. The facility has been operating at its current location since 1957 and Piper is owned by Singapore based investment company Imprimis, funded by government of Brunei.

Piper Aircraft Inc. is located at 2926 Piper Drive, Vero Beach, Florida, Indian River County. Piper occupies 75,000 square feet facility and is connected to City of Vero Beach municipal water and sewer services. The facility has a pre-treatment permit for their process wastewater for pH adjustment prior to discharging to City of Vero Beach Publicly Owned Treatment Works (POTW). The facility employs approximately 1,150 employees, and operates mainly two shifts Monday through Saturday, 7:30am to 12 midnight.

The facility's most recent, May 15, 2022, notification of hazardous waste activities (EPA Form 8700-12) to FDEP indicated that Piper notified as a large quantity generator (LQG) of hazardous waste. Hazardous wastes are primarily generated from Bond/Clean Line Area, Sub-Assembly Area, Wing Assembly Area, Fuselage Assembly Area, Upholstery/Interiors Area, Final Assembly Area, Flight Line Area, Final Paint Shop Area, and Maintenance Area. Wastes generated in these areas include used oil, used antifreeze, solvent rags, spent acetone, paint-related waste, sanding booth filters with chromium, waste kerosene, waste gasoline, acid solution exhibiting hazardous waste characteristics of ignitability (EPA Waste Code D00l), corrosivity (EPA Waste Code D002), toxicity for chromium (EPA Waste Code D007), lead (EPA Waste Code D008), benzene (EPA Waste Code D018), methyl ethyl ketone (EPA Waste Code D035), and hazardous waste from nonspecific sources for spent non-halogenated solvents (EPA Waste Codes F003, and F005).

9) Previous Inspection History

The facility was previously inspected by FDEP on June 26, 2020, as an LQG and found several minor violations. The violations were resolved without a formal enforcement action. The facility was inspected by FDEP on November 13, 2017, as a LQG and was in compliance. According to RCRAInfo, the EPA has not conducted a RCRA CEI at this facility.

10) Opening Conference

On March 8, 2023, EPA inspector Parvez Mallick accompanied by FDEP inspectors Johanna Polycart, Kaitlyn Taylor, Susan Bryan, and FDEP staff Jeff Gregg conducted an unannounced CEI at Piper Aircraft Inc., Vero Beach, Florida to determine the compliance status of the facility with the RCRA and the State of Florida regulations. Inspectors arrived at Piper Aircraft Inc. and were greeted by Stacy Gordon, Senior Manager, Environmental Health and Safety and Duane Hoppe, Director, Manufacturing Operations of Piper Aircraft Inc. The inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an opening conference.

Piper Aircraft Inc. staff provided an overview of the facility's history and current operations during the opening conference. The inspectors described the possible use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. Piper Aircraft Inc. does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Health and safety protocols and required personal protective equipment were discussed with Stacey Gordon who led the inspectors on a tour of the facility's operations.

11) Inspection Observations

The information in this RCRA inspection report is based on the EPA's March 8, 2023, RCRA CEI. The inspection included the following areas:

Pre-Printing Area

Piper uses 3-D printers to create small plastic cosmetic parts like connectors, hinges, housings for the aircrafts. HP PA 12 thermoplastic polymer is used in the printer to manufacture small parts. No hazardous waste is generated in this process.

Building 1

Building 1 houses fabrication, production welding, and tooling areas. Aircraft parts are designed in the engineering department and drawings are sent to tooling in Building 1 to make the parts. After passing the tooling inspection area, where parts are compared with the engineering drawings, parts are returned to engineering for testing and, if satisfactory then sent to production. This area produces molds, forms, and tools used in the manufacturing of specific aircraft parts. Wastes generated include metal shavings, various coating, and hydraulic oils, as well as used rags.

Aircraft spars, ribs, struts, and other metal parts are welded in the Weld Shop area. Engine and seat frames are also produced in the production welding area. The inspectors observed one 55-gallon container marked "Non-Hazardous Waste" "Scrap Metal" in the area. One closed 30-

gallon acetone solvent parts washer marked “Hazardous Waste” and with an indication of the hazards of the contents was observed in this area and the facility representative stated that the spent acetone is disposed of as hazardous waste.

The Fabrication/Tooling area of this building is where the tools to make the parts are fabricated. Waste generated in this area includes waste acetone and spent solvent rags when cleaning the parts. One closed 55-gallon satellite accumulation area (SAA) container of waste acetone and filters, flammable solids (EPA Waste Codes D001, D007, D035, F003, and F005), was marked “Hazardous Waste” and with an indication of the hazards of the contents (Photo #1).

The Machine Shop area is where a computerized numerical control machine is used to create aircraft’s landing gear and other parts, by cutting, shaving, and shaping aluminum billets. Metal shavings that are generated from the machines are sent for recycling, and the inspectors observed one 4,000 pounds container full of metal shavings. An acetone solvent parts washer was also observed in this area that is serviced by Crystal Clean.

The Machine Shop has two SAAs. The inspectors observed the following containers in two separate locations:

- Seven 55-gallon containers of product hydraulic oil;
- Two closed 55-gallon containers marked “Used Oil”;
- One closed 55-gallon container of non-hazardous “Waste Coolant”;
- Two 55-gallon containers of oil dry;
- Two closed 55-gallon containers of waste acetone rags and filters (flammable solids) marked “Hazardous Waste” (EPA Waste Codes D001, D007, D035, F003, and F005) and with an indication of the hazards of the contents;
- One closed 55-gallon of liquid waste acetone (EPA Waste Codes D001) marked “Hazardous Waste” and with an indication of the hazards of the contents; and
- One closed 55-gallon of product mineral spirits.

Hand Re-work area is where minor adjustments are done on the parts by hand. Rough metals parts are also polished in this area. The inspectors observed one closed 55-gallon container of waste acetone rags marked “Hazardous Waste” with a flammable indication of the hazards of the contents.

This area had a Press Room to fabricate or shape aircraft dome aft and other custom shaped parts. The inspectors observed the following in this area:

- One open 55-gallon container of “Used Oil”; and
- One closed 55-gallon container of waste acetone rags marked “Hazardous Waste” and with an indication of the hazards of the contents.

In the Cleaning/Bath area, the parts are dipped in a series of baths. The parts are cleaned in a tank with soap and water at 110-165°F. The facility applies heat and shock cooling treatment system to soften aluminum sheets before stretching. Sheet aluminum is heated in a salt bath (sodium nitrate and potassium nitrate) to 920°F, shock cooled in a quenching bath and placed in a freezer. The heating and freezing process re-aligns the aluminum molecules, thereby softening

the metal. The quenching bath maintains a continuous flow of water that discharges to the sanitary sewer. Parts that have been coated with waxes and oils before pressing are cleaned in a 310 L alkaline wash tank and rinsed with water. The rinsate is discharged to the sanitary sewer.

Building 2

Building 2 contains the fabrication areas. Parts are stamped out of sheets of aluminum in automated or manual processes. The facility uses two quench tanks for heat treating the parts. The inspectors observed the following in this area:

- One open 55-gallon container of non-hazardous "Oil Dry Solids";
- One closed 55-gallon container of chromium salt and debris (EPA Waste Codes D001 and D007) marked "Hazardous Waste," "Oxidizer," and with an indication of the hazards of the contents (Photo #2); and
- One closed 55-gallon container of acetone rags marked "Hazardous Waste" and with an indication of the hazards of the contents in the laser cutting area.

Building 3

Building 3 is used for small parts paint shop. It uses two paint booths and two ovens to dry the parts after painting. The inspectors observed the following in the paint shop:

- One closed 55-gallon container of acetone waste marked "Hazardous Waste," "Flammable Solids," and with an indication of the hazards of the contents;
- One closed 55-gallon container of acetone waste marked "Hazardous Waste," "Flammable Liquids," and with an indication of the hazards of the contents;
- One closed 55-gallon container of waste paint mop water with chromium marked "Hazardous Waste" (EPA Waste Code D007), and with an indication of the hazards of the contents;
- One open cubic yard cardboard box of hazardous paint booth filters with no markings, indication of the hazards of the contents, and accumulation start date at the time of the inspection (Photo #3). ***Since the cubic yard container exceeds the 55-gallon maximum requirement for SAA, the facility shall either move this container to the central accumulation area (CAA) or treat this area as a CAA in accordance with 40 C.F.R. § 262.17. The container also requires an accumulation start date in accordance with 40 C.F.R. § 262.17(a)(5)(i)(A-C). If the facility elects to manage this area as a central accumulation area, the containers in this area will require weekly inspections and documentation as required by 40 C.F.R. § 262.17(a)(1)(v) and Fla. Admin. Code Ann. r. 62-730.160(3), F.A.C.;*** and
- One closed 55-gallon plastic container of waste sulfuric acid and ferric sulfate marked "Hazardous Waste," "Corrosive," and with an indication of the hazards of the contents in the QA Laboratory.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and 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.

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, a generator must mark or label its containers with the following: (A) The words "Hazardous Waste"; (B) 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); and (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

Building 3A

Building 3A is a subassembly area where the smaller parts of the airplanes are assembled and cleaned. There are two SAAs in separate locations of the building. The inspectors observed the following containers in the building:

- Two closed 55-gallon containers of waste acetone rags marked "Hazardous Waste," "Flammable Solids," and with an indication of the hazards of the contents in separate SAAs; and
- One closed 55-gallon container of used oil was marked "Non-Hazardous Waste" and "Waste Oil."

Pursuant to Fla. Admin. Code Ann. r. 62-710.401(6) [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."

In the Bonding area, small parts are taped together using a strong adhesive and heated at 275°F degrees to fuse and hardens in the oven. No hazardous waste is generated in this area. Outside of the Bonding area, the inspectors observed:

- One closed 55-gallon container of aerosol cans marked "Hazardous Waste," "Flammable Gas," and with an indication of the hazards of the contents; and
- One open 55-gallon container of paint cans marked "Hazardous waste" and with an indication of the hazards of the contents.

Building 4

Building 4 is used for the assembly and fuselage of the parts for the Cherokee aircrafts. The inspectors observed three satellite areas in this building with the following:

- Three closed 55-gallon containers of waste acetone rags marked "Hazardous Waste," "Flammable Solids," and with an indication of the hazards of the contents in satellite stations # 4-1, 4-2 and 4-3; and

- One closed 55-gallon container of aerosol cans marked "Hazardous Waste," "Flammable Gas," and with an indication of the hazards of the contents.

The inspectors observed that the workers in this area use a 5-gallon container to store the waste acetone rags, before adding the rags to the 55-gallon SAA container #4-2. Since the two containers exceed the 55-gallon maximum requirement for SAA, the facility shall either move the 55-gallon container to the central accumulation area (CAA) or treat this area as a CAA in accordance with 40 C.F.R. § 262.17. The 55-gallon container would also require an accumulation start date in accordance with 40 C.F.R. § 262.17(a)(5)(i)(C). If the facility elects to manage this area as a central accumulation area, the containers in this area will require weekly inspections and documentation as required by 40 C.F.R. § 262.17(a)(1)(v) and Fla. Admin. Code Ann. r. 62-730.160(3), F.A.C.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

The wing assembly area is used to assemble the wing parts of the Cherokee aircrafts. The inspectors observed the following:

- One closed 55-gallon container of waste acetone rags marked "Hazardous Waste," "Flammable Solids," and with an indication of the hazards of the contents; and
- One closed 55-gallon of alkaline batteries marked "Universal Waste Alkaline Batteries" but not dated with an accumulation start date.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to 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.

<u>Building 5</u>

Building 5 is also used for assembly and fuselage of planes. The inspectors observed three separate SAA locations in this building with the following:

- One open 55-gallon container of paint cans marked "Hazardous waste," "Flammable Solids," and with an indication of the hazards of the contents;
- One closed 55-gallon container of waste acetone marked "Hazardous Waste," "Flammable Liquid," and with an indication of the hazards of the contents; and
- One closed 55-gallon container of used oil marked "Used Oil."

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)(i)], which is a condition of the SAA Permit Exemption, a generator is required to keep a container holding hazardous waste be closed at all times during accumulation except when adding, removing, or consolidating waste.

Building 6

Building 6 contains engine assembly and fiber glassing operations. Products used in this area include resin and black poly paste. Four separate satellite locations were observed in this building with the following:

- One closed 55-gallon container of waste acetone marked "Hazardous Waste," "Flammable Liquid" and with an indication of the hazards of the contents;
- Four closed 55-gallon containers of waste acetone rags marked "Hazardous Waste," "Flammable Solids," and with an indication of the hazards of the contents;
- One closed 55-gallon container of aerosol cans marked "Hazardous Waste," "Flammable Gas," and with an indication of the hazards of the contents.

The inspectors observed an employee placing waste acetone rags into a regular trash container. The facility representative informed the employee that waste acetone rags must go to the designated 5-gallon container of "Waste Acetone Rags." The inspectors informed the facility that employees must place hazardous wastes and debris in designated hazardous waste container and must have knowledge of making proper waste determination of wastes.

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 determine if that waste is a hazardous waste following the methods articulated into Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

Hazardous Waste Central Accumulation Area (CAA)/90-day Storage Area

The CAA is in a separate building that is self-contained, and the floor has grated drain to capture spills. The floor drain is connected to containment system located outside. The inspectors observed the following in the CAA:

- Ten 250-liter totes marked "Hazardous Waste," "Corrosive," marked with an indication of the hazards of the contents, and with an accumulation start date (Photo #4);
- Nineteen closed 55-gallon containers marked "Hazardous Waste," "Flammable Liquids," marked with an indication of the hazards of the contents, and with an accumulation start date (Photo #5);
- Twenty closed 55-gallon containers marked "Hazardous Waste," "Flammable Solids," marked with an indication of the hazards of the contents, and with an accumulation start date;
- Twenty-one closed cubic yard boxes of paint waste filters marked "Hazardous waste" marked with an indication of the hazards of the contents, and with an accumulation start date (Photo #6);
- Seven 55-gallon containers of oil to be reused, marked "Reuse Oil" on wooden pallets;
- Three closed 55-gallon containers of paint cans marked "Hazardous Waste," marked with an indication of the hazards of the contents, and with an accumulation start date;
- Four 55-gallon containers marked "Used Oil"; and
- One closed container marked "Universal Waste Batteries" and with an accumulation start date less than a year during the inspection.

The inspectors checked start accumulation date of the hazardous waste containers and found that the containers have been in storage for less than 90 days.

Building 7

The interiors of all production aircraft including upholstery are put together in Building 7. Building 7 also serves as a service center where maintenance is done on the aircrafts. The inspectors observed two SAAs in separate locations in this building (Photo #7):

- One closed 55-gallon container of waste acetone marked "Hazardous Waste," "Flammable Liquid," and with an indication of the hazards of the contents;
- One closed 55-gallon container of waste acetone rags marked "Hazardous Waste," "Flammable Solids," and with an indication of the hazards of the contents;
- One closed 55-gallon container of used oil marked "Used Oil"; and
- One closed 55-gallon container of aerosol cans marked "Hazardous Waste," "Flammable Gas," and with an indication of the hazards of the contents.

The workers in this area use a 5-gallon container to store the waste acetone rags, before adding the rags to the 55-gallon SAA container. Since the two containers exceed the 55-gallon maximum requirement for SAA, the facility shall either move the 55-gallon container to the central accumulation area (CAA) or treat this area as a CAA in accordance with 40 C.F.R. § 262.17. The 55-gallon container would also require an accumulation start date in accordance with 40 C.F.R. § 262.17(a)(5)(i)(C). If the facility elects to manage this area as a central accumulation area, the containers in this area will require weekly inspections and documentation as required by 40 C.F.R. § 262.17(a)(1)(v) and Fla. Admin. Code Ann. r. 62-730.160(3), F.A.C.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

Building 9

Building 9 is the Paint Shop, houses the main painting operation. This building contains multiple large paint booths; however, one booth is used for sanding operations. The inspectors observed four SAAs inside of the building in separate painting locations:

- Two closed 55-gallon containers of waste acetone rags marked "Hazardous Waste," "Flammable Solids," and with an indication of the hazards of the contents in separate locations. One of the containers was open and full at the time of the inspection. The facility was informed that the container should be moved to the CAA for proper storage and disposal;
- One closed 55-gallon container of aerosol cans marked "Hazardous Waste" and "Flammable Gas," and with an indication of the hazards of the contents;
- One closed 55-gallon container of chromium contaminated sanding waste marked "Hazardous Waste" (EPA Waste Code D007) and a DOT Class 9 miscellaneous

dangerous goods label. Inspectors informed the facility representative that use of a DOT Class 9 miscellaneous dangerous goods label is not appropriate to meet RCRA labeling standard (an indication of hazards of the contents). Additional information ca be found in EPA's website under Frequent Questions About Implementing the Hazardous Waste Generator Improvements Final Rule: https://www.epa.gov/hwgenerators/frequent-questions-about-implementing-hazardous-waste-generator-improvements-final#marking.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)(i)], which is a condition of the SAA Permit Exemption, a generator is required to keep a container holding hazardous waste be closed at all times during accumulation except when adding, removing, or consolidating 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).

The facility also stores paint waste materials and product acetone in the outside area of Building 9 (Photo #8). There were two parts washers that are used to clean the paint guns and the parts washers are serviced by Crystal Clean. The inspectors observed one closed 55-gallon of waste paint materials marked "Hazardous waste" with an indication of hazards of the contents. One closed 55-gallon container of waste acetone rags marked "Hazardous Waste," "Flammable Solid," and with an indication of the hazards of the contents. The inspectors indicated that SAA container be established "at or near" the point of generation and must be "under the control of the operator." Consolidating or bringing hazardous waste into containers not located at or near the point of generation does not meet the SAA container requirements per 40 C.F.R. § 262.15(a).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], and is a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in § 262.31 or § 262.33(e) of this chapter or 1 kg (2.2 lbs) of solid acute hazardous waste listed § 262.31 or § 262.33(e) of this chapter 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 interim status and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, provided that all of the conditions for exemption in this section are met.

<u>Building 21</u>

Building 21 is located along the flight line and is used for final assembly, fueling and final

adjustments of the aircrafts before certification. In the outside area The inspectors observed a closed box of universal lamps marked "Universal Waste – Lamps" but no accumulation start date.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to 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.

12) Records Review

After the walkthrough, the inspectors requested and reviewed the facility's applicable manifests, waste profiles, Land Disposal Restriction (LDR) notification forms, weekly inspections, contingency plan, training records, arrangement with the local authorities, biennial report, and employee training records. Unless otherwise specified, all records and documents reviewed were considered satisfactory at the time of inspection.

The facility uses A.R. Paquette & CO (FLD982105884) as a transporter and the designated facility is Tradebe Treatment & Recycling of TN (TND000772186). Invoices for recycling of scrap metal to Viking Recycling and recycling of fluorescent lamps to EnviroLight & Disposal was available for review.

The facility maintains a contingency plan (CP) that includes emergency contact information, an evacuation map, emergency response and preparedness procedures, arrangements with local authorities, and emergency equipment descriptions and locations. The CP was last revised on January 12, 2023. The inspectors informed the facility that the facility will have to amend the contingency plan and quick reference guide because the facility's intention is to modify several of the satellite areas into 90-day hazardous waste storage areas.

Spill kits, eye wash and shower stations, fire alarms, and fire extinguishers are available on-site and the facility conducts routine inspections, testing, and maintenance of all communications systems, fire protection equipment, spill control equipment, and decontamination equipment. The facility uses 2-way radio throughout the facility capable of summoning assistance.

The facility conducts weekly inspections of hazardous waste containers in the CAA. The container inspection log included the date and time of inspection, the name of the staff member conducting the inspection, any corrective actions taken, and the total number of bins in the CAA. Weekly inspection records are maintained for at least three years as per F.A.C. Rule 62-730.160 (3).

The inspectors reviewed facility's annual hazardous waste trainings of all staff in contact with hazardous materials and hazardous wastes. This training includes understanding and recognition of hazardous wastes. Documentation of job titles and position descriptions for personnel involved with hazardous waste management are managed on-site. Biennial report for the facility's hazardous waste activities in 2021 was available to review on-site. The biennial report

was submitted to FDEP on July 6, 2022.

13) Closing Conference

Upon conclusion of the inspection, a closing conference was conducted in the presence of Stacy Gordon, representing Piper. The facility was informed of the preliminary findings at the time of the inspection.

14) Conclusion

Based on the CEI conducted on March 8, 2023, Piper was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. The facility provided photos of corrective actions taken in SAAs and CAA on March 17, 2023, and April 21, 2023, and an updated contingency plan and other compliance issues corrected after the inspections on May 1, 2023. Based on the information provided during and following the inspection, the facility has returned to compliance.

15) Signed

PARVEZ MALLICK Digitally signed by PARVEZ MALLICK Date: 2023.06.06 12:27:01 -04'00'

Parvez Mallick
Environmental Engineer
RCRA Enforcement Section

6/6/2023
Date

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ Date: 2023.06.06 14:12:42 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Piper Aircraft Inc.
FLD004054284
March 8, 2023
RCRA CEI Photographs
Photographs by Parvez Mallick, EPA
Camera: Canon PowerShot

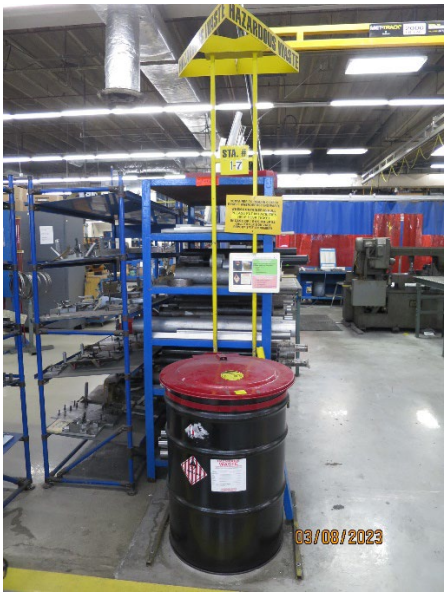

Photo #1 – Building 1- a 55-gallon container of waste acetone and filters, flammable solids.

Photo #2 – Building 2- 55-gallon container of hazardous waste chromium salt and debris.

Photo #3 – Building 3 - cubic yard paint booth filters box not marked or dated.

Photo #4 – CAA Building – 250-liter totes of corrosive waste marked and dated.

Piper Aircraft Inc.
FLD004054284
March 8, 2023
RCRA CEI Photographs
Photographs by Parvez Mallick, EPA
Camera: Canon PowerShot

Photo #5 – CAA Building – containers liquid flammable hazardous waste.

Photo # 6 – CAA Building – cubic yard boxes of paint waste filters.

Photo #7 – One of the SAA in Building 7.

Photo #8 – Building 9 – two 55-gallon SAA hazardous waste containers located outside the building.