

RCRA Inspection Report

1) Inspectors and Authors of the Report

David Champagne
Physical Scientist/Inspector
(404) 562-9028
Champagne.David@epa.gov
U.S. EPA Region 4
Resource Conservation and Recovery Act Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth St. S.W. 10th Floor
Atlanta, GA 30303-8960

2) Facility Information

Gulfstream Aerospace Corporation - Main
500 Gulfstream Road
Savannah, Georgia 31408
EPA ID # GAD061022216
NAICS Code: 336411 - AIRCRAFT MANUFACTURING

3) Responsible Official

Mr. William Sherrod
Senior Manager Corporate Environmental Compliance
(Office) (912) 965-4876
(Mobile) (912) 663-8616
bill.sherrod@gulfstream.com

4) Inspection Participants

Mr. William Sherrod, Gulfstream, Senior Manager Corporate Environmental Compliance
Mr. Robert Large, Gulfstream, Environmental Compliance Specialist
Mr. Alex Ellwood, Gulfstream, Corporate Environmental Compliance Manager
Mr. David Screen, Hazardous Material Supervisor
Mr. David Champagne, U.S. EPA Region 4, Inspector
Mr. Jim McNamara, Georgia Environmental Protection Division (GAEPD), Inspector

5) Date of Inspection

June 2, 2021, 09:00 hours

6) Applicable Regulations

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopts and incorporates by reference 40 CFR Parts 260 - 266, 268, 270, 273 & 279. The Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-60, et seq. as amended (Act), Chapter 391-3-11 of the Georgia Rules for Hazardous Waste Management (Rules), and those portions of 40 CFR Parts 260-270, 273, and 279 that are adopted into the Rules by reference).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 262.10], a Large Quantity Generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2200 lbs) 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. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of the inspection was to conduct an announced hazardous waste compliance evaluation inspection (CEI) to determine the facility’s compliance with applicable RCRA regulations.

8) Facility Description

The Gulfstream facility in Savannah, Georgia manufactures small aircraft. Gulfstream operates two separate campuses that are contiguous. The main site, the site reviewed, consists of approximately 198 acres, which is access controlled. The entire campus is approximately 400 acres. Gulfstream has approximately 10,000 employees in the Savannah area.

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 19, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste. In addition, the facility is a small quantity handler of universal waste and a used oil generator. According to Gulfstream’s biennial hazardous waste report, the facility generates the following EPA hazardous waste codes: D001, D003, D005, D006, D007, D008, D009, D011, D035, F001,

F003, F005, F019. The facility has a Title V Permit (Permit No. 3721-0510046-V-04-0) for the operation of an aircraft manufacturing and servicing facility. The permit is set to expire five (5) year from its effective date of January 23, 2018. The facility also has a Hazardous Waste Permit (Permit No. HW-046(D)) for the post-closure care and corrective action for a closed hazardous waste landfill.

9) Previous Inspection/Compliance History

The last RCRA CEI was conducted by GAEPD on September 12, 2018 and the following violations were identified:

- 40 C.F.R. § 265.1087(c)(1)(ii) Interim Status Standards for Owners and Operators of HW TSDs: Air Emission Standards for Tanks, Surface Impoundments and Containers; Equipped with cover and closure devices that form a continuous barrier over openings such that no open spaces into interior of container are visible
- 40 C.F.R. § 262.17(a)(5)(i)(A) and 262.17(a)(5)(i)(B) Standards Applicable to Generators of HW: General; Label or mark each LQG container with an indication of the hazards of the contents
- 40 C.F.R. § 262.17(a)(1)(iv) Standards Applicable to Generators of HW: General; Closed container during storage in LQG Central Accumulation Area (CAA), with limited exceptions.

10) Findings

Opening Conference

On May 27, 2021, David Champagne, EPA and Jim McNamara, GAEPD met with William Sherrod, Senior Manager Corporate Environmental Compliance from Gulfstream Aerospace Corporation - Main (Gulfstream or facility), located at 500 Gulfstream Road in Savannah, Georgia to discuss conducting a RCRA Compliance Evaluation Inspection (CEI) to be conducted on June 2, 2021. Mr. McNamara emailed the facility a list of documents to be reviewed as part of the CEI. The inspectors explained the purpose of the inspection and inquired about facility COVID-19 policies and practices. To adhere with Center for Disease Control and Prevention (CDC) social distance guidance, the inspection team has requested record-retention documentation from the facility to be reviewed offsite. On June 2, 2021, at approximately 09:00 A.M., the EPA and GAEPD inspectors arrived at the facility. The inspection team presented credentials to the facility team and introductions were made. The facility provided a brief overview of the operations before beginning a process based CEI.

Hanger 1

Hydraulic testing and inspections of aircraft are conducted in Hanger 1. Used oil is generated in this area. Hazardous waste is generated from the use of various paints during the touch up process on the aircraft. Spill pads are used to collect any drips/spills from the paint touch up process and aerosol cans are also collected as hazardous waste in this area. At the time of the inspection, SAAs were present in two adjacent rooms. Each room was equipped with one (1) 55-gallon container of used hydraulic and fuel filters, one (1) 55-gallon container of toxic non Alodine

chromium and lead waste from paints and sealants with EPA waste codes: D005, D006, D007, D008, D011, D035, F003 and F005, one (1) 55-gallon container to collect hazardous waste aerosol cans with EPA waste code D001, 55-gallon container(s) for used oil, one (1) 55-gallon container for non-hazardous RCRA absorbant pads and personal protective equipment (PPE). There are exact SAAs set up with this configuration throughout the facility and this report will refer back to the Hanger 1 SAA set up.

Hanger 2

Hanger 2 is where the final inspection and testing of the aircraft is conducted. This area consists of the same SAA set up as Hanger 1. At the time of the inspection, a non-hazardous container that was labeled “Metal Cans Only” consisted of hazardous personal protective equipment (PPE) (Photographs 1 and 2 of 3). This container was not labeled hazardous waste and did not have the indication of the hazardous contents.

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 do the following: mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Hanger 3 and 4

Hangers 3 and 4 consist of a similar inspection and testing process of aircraft to Hangers 1 and 2, but also includes the installation of upholstery. Hangers 3 and 4 have the same SAAs as Hangers 1 and 2. Additionally, Hangers 3 and 4 operates a glue booth where fabrics and leather are glued to foam prior to aircraft installation. This operation generates a waste sealant that is hazardous for EPA Codes D005, D006, D007, D008, D011, D035, F003, F005. All SAA hazardous waste containers in this Hanger were labeled hazardous waste, had the indication of hazardous contents, and were closed.

Hanger 6

This location houses a wash rack for various components of the aircraft and waste filters are collected and disposed of in a CAA. There were three (3) roll-off containers storing toxic chromium waste and waste filters (EPA waste codes: D005, D006, D007 and D008) being stored in an adjacent outside location. The oldest date on these containers was April 21, 2021. Each roll-off container was closed, labeled hazardous waste, and had the indication of the hazardous contents.

Hanger 7

Hanger 7 is known as the preparation hanger where aircraft is sanded and painted. There are 4 separate working stations for four (4) different areas of the aircraft. Each station is set up with its own 55-gallon SAA container for toxic paint sealant hazardous waste (EPA waste codes: D005, D006, D007, D008, D011, D035, F003, F005) and toxic flammable liquid paint waste (D001, D005, D007, D008, D035, F001, F003, F005). Each of these containers was 55-gallons and was labeled hazardous waste and had the indication of the hazardous contents. Two stations operate a

dust collector that collects SAA hazardous waste with EPA waste codes D005, D006, D007 and D008. This container was labeled “Hexavalent Chromium Hazardous Waste” but did not have an indication of the hazardous contents.

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

Hanger 7 also has an approximate 250-gallon central accumulation area (CAA) container for “Hexavalent Chromium Hazardous Waste”. This container was labeled, closed, and dated April 28, 2021.

Hanger 9 and 10

Hanger’s 9 and 10 consist of installing furniture and paint touch-ups. This area consists of the same SAA setup in Hanger’s 1 and 2. All containers were labeled hazardous waste, labeled with the indication of hazardous contents, and closed. These hangers also have three (3) glue booths with the same set up as found in Hangers 3 and 4. There are two glue booths on the first floor and one on the second. All containers were labeled hazardous waste, labeled with the indication of hazardous contents, and closed.

G-650 Manufacturing Line

This area is set up the same as SAAs in Hangers 1 and 2. Each container in this area was labeled hazardous waste, labeled with the indication of the hazardous contents, and closed.

Paint Shop Building

Paint sealants and strippers are used in this location. There 3 different rooms in this location, each equipped with one (1) 55-gallon SAA to manage liquid hazardous waste (EPA waste codes: D001, D005, D007, D008, D035, F001, F003, F005) and one (1) 55-gallon container to manage the solids (PPE, rags, brushes) generated from the sealants and paints (EPA waste codes: D005, D006, D007 and D008). All containers were labeled hazardous waste, had the indication of hazardous contents, and closed.

CMC Wood Shop

The wood shop is divided into 6 separate workstations throughout building. Each workstation has a 55-gallon container managing paint sealant hazardous waste and a 55-gallon container of toxic hazardous waste blast media (EPA waste codes: D005, D006, D007, and D008). At the time of the inspection, all SAA paint sealant containers were labeled hazardous waste, had the indication of the hazardous contents, and were closed. Blast media is collected from workstations and transferred via duct conduit to an outside collection area (Photograph 3 of 3). The sealant around the rim of the 55-gallon SAA container where the duct conduit meets the container had been compromised and deemed open by the inspection team.

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.

Wastewater Treatment Sump

Outside the building, the inspectors observed a sump that received wastewater generated from operations in the hangers. The inspector asked Mr. Sherrod how the sludge from sump clean-out was characterized. The inspectors were informed that the sump sludge was characterized as non-hazardous waste, which is characterized by waste profile 96-5087. Waste profile 96-5087 was reviewed by the inspectors and included analytical data from sampling conducted in 2005 and 2007. Additional sampling was conducted on March 23, 2015 and the resulting datum was found to support the non-hazardous determination.

Main Haz-Mat Yard – CAA

Located in the Main Haz-Mat Yard is the CAA. At the time of the inspection, there were forty (40) 55-gallon containers of paint sealant hazardous waste. All the containers were labeled hazardous waste, had the indication of hazardous contents, dated, and closed. The oldest date identified was May 24, 2021. There was one (1) 55-gallon container of hazardous waste blast media, and ten (10) 55-gallon containers of flammable hazardous liquid waste. There were eighteen (18) containers of universal waste lamps ranging in sizes of 4-8 feet in length that were labeled, closed, and dated April 20, 2021. Two (2) 55-gallon containers were used to store NICAD and Lithium batteries. Both containers were labeled Universal Waste, closed, and dated October 7, 2020.

Records

The following records were requested and reviewed: Biennial Report; Uniform Hazardous Waste Manifests for the past 3 years; Land Disposal Restrictions; Bills of Lading; Waste Profiles; Contingency Plan (October 2020); Personnel Training Records; Job Descriptions; Documentation of Weekly Inspections. At the time of the inspection, annual training records for Mr. Sherrod were not up to date.

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

The facility utilizes the following Transporters for hazardous waste:

- Univar Solutions USA/Nexeo Solutions, Inc. EPA ID: TXR000084869
- Freehold Cartage, Inc. EPA ID: NJD054126164

The facility utilizes the following Designated Facility to dispose of hazardous waste:

- Tradebe Treatment and Recycling EPA ID: TND0007721186
- Univar Solutions Charlotte Plant EPA ID: NCD061263315

The facility utilizes the following Designated Facility to dispose of non-hazardous waste:

- VLS Recovery Services, LLC. EPA ID: SCR000762468

The facility utilizes the following Transporter for non-hazardous waste:

- Univar Solutions USA, Inc. EPA ID: TXR000084869

11. Summary

The inspectors conducted the exit meeting with facility team presenting the preliminary results of the inspection. Gulfstream Aerospace was inspected as a large quantity generator of hazardous waste. At the time of the inspection, the facility did not appear to be in compliance with some requirements of RCRA.

12) Signed



 David Champagne
 Physical Scientist

07/01/2021

 Date

13) Concurrence

ARACELI
 CHAVEZ

Digitally signed by
 ARACELI CHAVEZ
 Date: 2021.07.01
 13:59:07 -04'00'

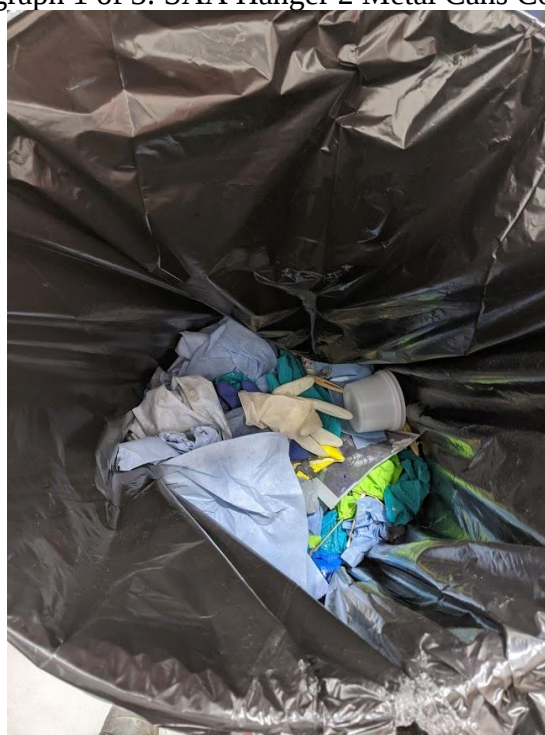
 Araceli B. Chavez
 Chief
 RCRA Enforcement Section

 Date

Photographs of Gulfstream Aerospace Corporation
500 Gulfstream Road
Savannah, Georgia 31408
EPA ID # GAD061022216
Photographs taken by: David Champagne on June 2, 2021
Camera Model: Google Pixel 3XL



Photograph 1 of 3: SAA Hanger 2 Metal Cans Container



Photograph 2 of 3: SAA Hanger 2 Inside Metal Cans Container



Photograph 3 of 3: Hazardous Waste Blast Media Collection Area