

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Lockheed Martin-Air Force Plant 6
(Lockheed Martin)
86 South Cobb Dr
Marietta, Georgia 30063-7454

EPA ID# GA8570024606

3) Responsible Officials

Jeff Fulton
Chemical Handler Associate Manager
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4) Inspection Participants

Dustin Bridle, Lockheed
Kevin Orr, Lockheed
Raymond Ricker, Lockheed
Jeff Fulton, Lockheed

Josh Hayes, Georgia Environmental Protection
Division (GAEPD)
Brooke York, USEPA
Nereida Hernandez Morales, USEPA

5) Date of Inspection

March 21, 2023, at 9:30 a.m.

6) Applicable Regulations¹

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, Ga. Code Ann. § 12-8-60 *et seq.*, and

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.

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], 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”).

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Lockheed Martin-Air Force Plant 6 (hereinafter, “Lockheed Martin” or the “facility”) compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit GA8570024606, and the corresponding Georgia Environmental Protection Division regulations. This was an EPA lead inspection.

8) **Facility Description**

Lockheed Martin is located at Dobbins Air Reserve Base in Marietta, Georgia. Lockheed Martin occupies approximately 855 acres (Air Force owns 750 acres and Lockheed Martin owns 105 acres). Civilian and military personnel consist of approximately 7,500 employees. Access to the facility is restricted. Visitors must register with security personnel at the main lobby and must be always escorted by facility personnel. Air Force Plant 6 (AFP 6) is currently owned by the United States Air Force and operated by Lockheed Martin Aeronautics. The site includes high bay facilities used for the production and maintenance of aircraft. The facility self-identified with the NAICS 336411- aircraft manufacturing.

AFP 6 was established in 1941 and began operation in 1943. From 1943-1945 the facility was occupied by Bell Aircraft Corporation (also known as Bell Bomber). Production ceased in 1945 and for 6 years the plant was used for machine and tool storage. In 1951, the plant was

reactivated and used by Lockheed Aircraft Corp. to manufacture, modify, and maintain a variety of aircrafts.

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 1, 2022, characterized the facility as a large quantity generator (LQG). Waste codes from the EPA Form 8700-12 include D001, D002, D005, D006, D007, D008, D009, D011, D018, D022, D028, D035, D039, D040, F002, F003, F035, P022, and U228. The facility also notified as a large quantity generator of universal wastes (batteries, lamps and mercury containing equipment).

9) **Previous Inspection History**

EPA and GAEPD have conducted a RCRA CEIs at the subject facility nearly every year since 1984. The most recent RCRA CEI was conducted by GAEPD on July 21, 2020. No apparent violations were observed during that inspection.

10) **Opening Conference**

On March 21, 2023, EPA inspectors Brooke York and Nereida Hernandez Morales, accompanied by GAEPD inspector Josh Hayes, arrived at Lockheed Martin at approximately 9:30 am. After checking-in with the security and allowing facility's personnel to arrive, we were received by Dustin Biddle, Kevin Orr, Jeff Fulton, and Raymond Ricker. The inspectors introduced themselves, showed their credentials to facility representatives, 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 use of digital camera was not approved by Lockheed Martin, instead Jeff Fulton took the pictures and provided them by email to the inspectors. 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.

Jeff Fulton 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 representatives led the inspectors on a tour of the Facility operations.

11) **Inspection Observations**

Lockheed Martin operates several central accumulation areas (CAAs) and few satellite accumulation areas (SAAs) across the facility. Hazardous waste is initially accumulated in the SAAs. When the waste is ready to be moved, it is transported to a CAA (a ninety-day accumulation area) before shipment (manifested off-site). There are several emergency eye wash stations, spill kits, and communication stations located around the SAA and CAA areas.

Unless otherwise noted all containers (of up to 55 gallons) in the satellite accumulation areas were closed, labeled with the words “Hazardous Waste” and had an indication of the hazards of the contents. In addition, unless otherwise noted, each container of hazardous waste observed within any CAA was observed to be closed, marked with an accumulation start date of less than 90-days, labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

Aircraft C-130 Manufacturing Area:

Several SAAs and CAAs, with containers of up to 55 gallons, were observed in the Aircraft C-130 Manufacturing area. The hazardous wastes generated from the manufacturing process are flammable liquid (adhesive promoters, click bond), corrosive (Alodine), flammable solid (solvent wipes), flammable liquid (paint, solvent, adhesives, accelerators), aircraft sealant, spent solvent, chromium sealant, and respirator cartridges. At the time of the inspection, the containers used to store hazardous waste were closed, labeled with the words “Hazardous Waste”, and with the indication of the hazard of its contents. (Figures 1 to 6).

Other containers of waste or used materials were also observed in this area. These containers were labeled as: waste to energy (Figures 4), white cloth rags (excluded solvent contaminated wipes), recycling plastic chemical bottle, batteries (No lithium or cadmium), and scrap wire.

Silk Screen Printing Area

At time of the inspection the following containers were observed in the CAA: one 30-gallon container with white cloth rags (D001), one 55-gallon container with cups and strains (D007), one 55-gallon container labeled as “empty cans only”, one 55-gallon container with flammable liquid (paint solvent), and one small container with methyl propyl ketone (MPK). The container labeled as flammable liquid (paint solvent) was equipped with a funnel with a flip top lid that did not provide a seal at time of the inspection (Figure 7).

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.

Solvent Recycling Center

This area has a label on the wall that read “Hazard - Cr VI” (chromium hexavalent). At time of the inspection, the following containers were observed in the CAA: six 55-gallon containers with paint cans and one 30-gallon container with flammable liquid (paint solvent – F003).

Vacuum Area and Chemical Conversion Process

At time of the inspection, the inspectors observed a CAA with eight containers. One 30-gallon container labeled as dirty rags, one 55-gallon container labeled as waste to energy, one 55-gallon container labeled as flammable waste (F003), one 55-gallon container labeled as solvents wipes (D001), one 55-gallon container labeled as Alodine (D007), one 55-gallon container labeled as adhesive (D001), one 55-gallon container labeled as chromium (D007), and one 30-gallon container labeled as cups resins (D007).

Inside a room that is located next to the vacuum area, the inspectors observed one 55-gallon container labeled as non-RCRA waste, one 3-gallon container with batteries (non-Li/Cd), and one 55-gallon container with solvent paint (F003).

The chemical conversion process consists of several double-walled containers used during the conversion process. This area is equipped with a spill kit located inside a cabinet.

Building Number 3 (West Hallway)

This CAA is located next to Building Number 1. At time of the inspection, the inspectors observed one 55-gallon container with solvent wipes (flammable solid, D001), one 3-gallon container with a spill kit, and four plastic Ziplock bags (Figure 8) with spray cans labeled as “hazardous waste” and dated March 21, 2023. The bags were not labeled with the hazards of the contents.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(5)(i) and (ii)], a large quantity generator must mark or label its containers with 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.

Paint Storage Hangar -Flying

Outside the hangar, the inspectors observed a cabinet used as a CAA to store hazardous waste. The following was observed at time of the inspection: one 55-gallon container labeled as F003, one 30-gallon container labeled as D001, and six plastic bags (with cartridges, pads, and paint cans) labeled as “hazardous waste” and dated March 20, 2023 and March 21, 2023. The plastic bags were not labeled with an indication of the hazards of the contents (Figure 9).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(5)(i) and (ii)], a large quantity generator must mark or label its containers with 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.

Inside the hangar the inspectors met with Dallas Brown, Assistant Manager. The following containers were observed in the CAA. Two 55-gallon containers labeled as “hazardous waste”, F003 (one full and one half full), one (1) 30-gallon container labeled as “hazardous waste”, D007 (cubs and strains), and two 30-gallon containers labeled as “hazardous waste”, D001 (solvent wipes pads). This hangar also holds a gun cleaning operation area with an “acetone” label.

Warehouse – Building 26

In the warehouse of Building 26, Lockheed Martin manages a CAA (Figure 11) to store ignitable, toxic, corrosive, and/or reactive waste. The area was identified with a sign which read, “no smoking”, “danger, hazardous waste storage.”

The following containers were observed in this area.

- Two fiberboard boxes labeled “non-RCRA waste”
- Five 55-gallon containers labeled “non-hazardous”
- Ten 55-gallon containers labeled “used oil”
- Fifteen fiberboard boxes labeled “paint/cups/debris” – oldest date, March 17, 2023
- Eleven 55-gallon containers labeled “(D007) – oldest date, February 6, 2023
- Twelve cardboard boxes labeled “solvent wipes” (D001) – oldest date, February 3, 2023
- One 55-gallon container labeled “Ardox stripper” – dated, February 7, 2023
- Two (in used) 55-gallon containers, (F003) – dated, February 1, 2023
- Four 55-gallon containers (D001) labeled “Clickbond” – dated, March 2, 2023
- Thirty-nine 55-gallon containers (F003, D001) – oldest date, February 8, 2023. It seems that twenty containers contain chromium.

The containers were properly closed and dated; however, some of these containers (with chromium), with “hazardous waste content” were not properly identified with the hazard identification.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(5)(i) and (ii)], a large quantity generator must mark or label its containers with 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.

The inspectors also observed a cabinet used to store hazardous waste. A bottle (acid) was observed with two different dates (January 12, 2022 and March 1, 2023) at time of the inspection (Figure 10). This is an area of concern.

The facility also notified as a large quantity generator of universal wastes (batteries, lamps and mercury containing equipment). The most recent shipment of universal waste batteries was sent to Clean Harbors Reidsville LLC in North Carolina on February 2, 2023.

The inspectors observed twelve pallets of universal waste in this area at time of the inspection that were marked “Universal Waste – Lead/Acid batteries”. The batteries were marked with an accumulation start date. The oldest date observed was November 22, 2022.

The facility 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.

Records Review

Contingency Plan and Quick Reference Guide

The actions that facility personnel should take in response to an emergency are described in the facility’s “Hazardous Materials Emergency Response Plan”, which was last updated on December 21, 2022.

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 describes 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.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Kevin Orr is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

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.

A copy of the “Hazardous Materials Emergency Response Plan” was most recently submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee on December 21, 2022

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).

Job Titles and Employee Names

The inspectors reviewed facility job description and employee names that were provided for the Chemical Handler. The description includes the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Training Records

Lockheed Martin provided a written description of the type and amount of both introductory and continuing training to be given to the persons filling the position listed above. The inspectors reviewed records of employee hazardous waste training completed from 2020 to 2023.

Waste Manifest Records

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since October 2022. Hazardous waste manifest records show that D001 (ignitable), D002 (corrosive), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead), D011 (silver), D022 (chloroform), D035 (methyl ethyl ketone), and F003 and F005 (non-halogenated solvents) hazardous waste are routinely shipped to Clean Harbors El Dorado, LLC (ARD069748192), Clean Harbors Deer Park, LLC (TXD055141378), Tradebe Treatment Recycling of TN (TND000772186), Safety-Kleen Systems, Inc. (KYD053 348108), Clean Harbors Reidsville, LLC (NCD000648451), and Ross Incineration Services, Inc. (OHD048415665). The most recent shipment was made on April 17, 2023.

Weekly Inspection

The inspectors reviewed Lockheed Martin available records of inspections of the hazardous waste central accumulation areas since December 2022. 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 about cracks on the floor, berm damage, aisle space, visible container labels, legible container labels, completed container labels, closed lids and bungs, closed funnels, container grounded, material on outside of container, condition of containers, containers compatible with waste, container storage date, labels facing outward, etc. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Each week, the employee records notations of observations and necessary follow-up actions for the inspected areas.

12) **Closing Conference**

The inspectors conducted the exit meeting at approximately 4:00 p.m. with Jeff Fulton. Dustin Biddle and Kevin Orr attended the meeting by phone. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Lockheed Martin agreed to provide the records by email. The photos were taken by Jeff Fulton and provided by email on March 21, 2023. The records were provided by Jeff Fulton on May 8, 2023.

13) **List of Appendices**

Appendix 1 – Photo Log:
Photos taken on: March 21, 2023
Photos taken by: Jeff Fulton

14) **Signed**

Brooke York
Environmental Engineer

NEREIDA HERNANDEZ MORALES

 Digitally signed by NEREIDA HERNANDEZ MORALES
Date: 2023.06.29 14:59:12 -04'00'

Nereida Hernandez Morales
Life Scientist

15) **Concurrence**

Araceli B. Chavez
Chief
RCRA Enforcement Section