

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/15/2021	
Media Program:	RCRA	
Regulatory Program(s)	Hazardous Waste	
Company Name:	Aviation Technical Services (ATS Components DFW)	
Facility Name:	Texas Pneumatic	
Facility Physical Location:	15050 Trinity Boulevard	
(city, state, zip code)	Forth Worth, TX 76155	
Mailing address:	Same as above	
(city, state, zip code)		
County/Parish:	Tarrant	
Facility Phone Number	972-709-2866	
Facility Contact:	Tawney McCarty	HR Business Partner
FRS Number:	NA	
Identification/Permit Number:	TXR000084363	
Media Identifier Number:	NA	
NAICS:	96923	
SIC:	--	
Personnel participating in inspection:		
Debra Pandak	EPA Region 6	Inspector
EPA Lead Inspector Signature/Date		
	Debra Pandak	Date
Supervisor Signature/Date		9/16/21
	Jeff Yurk	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, Debra Pandak, EPA Region 6 inspector arrived at Texas Pneumatic Inc. at 12:20 pm on 09/15/2021 for an unannounced inspection. I met with Tawney McCarty, HR Business Partner for an opening conference. I presented my credentials and informed Ms. McCarty that this was an EPA inspection to evaluate the facilities compliance with the Resource Conservation and Recovery Act (RCRA) regulations.

The scope of the inspection is a Compliance Evaluation Inspection (CEI) and includes evaluation of the facility's hazardous waste management activities.

FACILITY DESCRIPTION

Texas Pneumatics, Inc. provides repair and overhaul services for commercial airlines predominantly for fuel related and pneumatic aircraft systems and components

The facility registered as Very Small Quantity Generator (VSQG) in 2018.

Section II - OBSERVATIONS

EPA's review of RCRAinfo database show Texas Pneumatics, Inc. generates hazardous wastes lab packs, flammable liquids (fuels) and universal wastes (paint wastes).

EPA's RCRAinfo database show Texas Pneumatic, Inc. registered characteristic waste codes: D001, D002, D018, D035, D039, and Listed waste codes: U002, U110, U194, U220, U404, P007, P008 and P046.

Based on waste generation in 2019 and 2020, Texas Pneumatics Inc. potentially generated quantities of hazardous waste triggering Small Quantity Generator status requirements (greater than 100 kgs/month generation rate).

Manifest Date:	Manifest No.	Kgs Reported	Waste Name/Code
01/21/2019	019495300JJK	27.2 kgs	Flammable Liquid 20073191
01/22/2019	019495301JJK	1633 kgs	D001, 2005219H
12/19/2019	020016658JJK	718 kgs	D001, 2003219H
08/10/2020	000334037 DAT	1451 kgs	D001, 2005219H

Section III – AREAS OF CONCERN

I provided a Notice of Potential Violation and Opportunity to Confer (NOPVOC) letter to Mr. McCarty. The NOPVOC identified the following concerns:

- Notification – Failure to notify the EPA or authorized state adequately describing the hazardous waste generating activity at the Facility pursuant to Section 3010(a) of RCRA, 42 U.S.C. § 6930(a), and the regulation at 30 TAC 335.6.
- Hazardous Waste Determination – Failure to conduct a hazardous waste determination pursuant to 40 C.F.R. § 262.11 and 30 TAC 335.62.

EPA requested information specific to facility operations and hazardous waste management as part of the NOPVOC letter.

Section IV – FOLLOW UP

EPA extended Texas Pneumatic Inc. the opportunity to advise the Agency via a conference call, or in writing, of any further information the EPA should consider with respect to the potential violations of the RCRA and the implementing regulations.

Texas Pneumatic Inc. has 14 days from the date of inspection to notify EPA if interested in participating in an opportunity to confer with the Agency.