

RCRA Inspection Report

1) Inspector and Author of Report

Tarin Tischler
Life Scientist
Phone: 404-562-9702
tischler.tarin@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Piedmont Aviation Component
Services
7102 Cessna Dr., Greensboro, NC
27409

EPA ID#: NCR000167882
NAICS #: 332813 - ELECTROPLATING, PLATING,
POLISHING, ANODIZING, AND COLORING
336413 - OTHER AIRCRAFT PARTS AND
AUXILIARY EQUIPMENT MANUFACTURING

3) Responsible Officials

Mark Spence
Environmental Health and Safety
Coordinator
mark.spence@piedmontaviation.com

4) Inspection Participants

Mark Spence, Piedmont
Neil Byrd, Piedmont
Cody Pertee, Piedmont
Michael Hall, Piedmont

Daniel Girdner, NCDEQ
Tarin Tischler, US EPA

5) Date of Inspection

December 7, 2023

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.

The North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119.

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.

Pursuant to 15A NCAC 13A .0107(a) [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 15A NCAC 13A .0107(a) [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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 15A NCAC 13A .0119 [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 of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Piedmont Aviation compliance with the applicable requirements of RCRA and the corresponding North Carolina regulations. This was an EPA lead inspection.

8) Facility Description

Piedmont Aviation Component Services (Hereinafter “Piedmont” or “the facility”) is an aviation parts repair and maintenance service company doing business as TAT Piedmont. The facility performs electroplating operations as refurbish and repair overhaul for aviation components, including landing gear companies and auxiliary power units (APU). The facility only services aviation parts and does not manufacture products. Operations conducted at the facility include machining, surface preparation, spray painting, paint stripping, electroplating, and sand blasting.

The bulk of the waste generated at the facility comes from overhaul of landing gear operations. APUs are not electroplated and therefore require only manual repairs and do not generate as much hazardous waste as landing gear operations. Most of the waste generated at the facility is rinsewater from the exhaust system scrubber. The facility has a 450-gallon tank for this

rinsewater generated in the dust control processes. The rinse water contains an F006 precursor and small concentrations of chromium under the regulatory level determined using the Toxicity Characteristic Leaching Procedure (TCLP). The material is nonhazardous at this location but generates an F006 sludge when treated at the designated facility in Charlotte, NC. The material in the tank is managed as hazardous waste exhibiting the characteristic of toxicity for chromium. This material is inorganic and therefore not subject to Subpart BB and CC monitoring.

The facility also generates paint waste and used oil. The exhaust scrubber is connected to the tank and rinse water generated here is disposed of directly in the tank. The facility has run one TCLP on this material at the beginning of facility operations as the process and materials have remained the same. The facility manages four central accumulation areas and several satellite accumulation areas throughout the facility. Piedmont operates as a large quantity generator of hazardous waste. Waste material is stored in central accumulation areas to be shipped for disposal. No treatment is done on-site. Facility representatives informed inspectors that in April of 2020, the facility submitted a proposal for a recirculation system as a totally enclosed treatment facility, but NCDEQ denied the proposal as it did not meet all requirements. The facility was referred to NCDEQ Facilities Management Branch for permitting assistance for the system, however the facility chose not to proceed due to upfront costs.

The facility opened in 2016 and operates the office Monday through Friday 7 am to 11 pm with plating operations. Piedmont employees approximately 140 staff.

9) Previous Inspection History

NCDEQ has conducted three RCRA CEIs at the subject facility between 2018 and 2023 and found zero violations during those inspections.

10) Opening Conference

On December 7, 2023, EPA inspector Tarin Tischler accompanied by North Carolina inspector Daniel Girdner arrived at Piedmont at approximately 9:00 AM. Mark Spence, Environmental Health and Safety Coordinator, received the inspectors. Mark Spence and the inspectors met for the opening conference. The inspectors introduced themselves, showed their credentials to Mark Spence 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.

Mark Spence 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

Receiving Area:

Piedmont receives the parts in need of servicing in crates and stores them in the receiving area shelves until they are ready to be processed in the various stages of assembly throughout the facility. Inspectors review the incoming parts, determine the issues, perform measurements, and then determine if repairs are adequate or if new parts should be ordered.

Inspectors observed high warehouse shelves in the receiving area storing parts waiting to be processed. These crates were labeled with their work order number and part number.

Shipping CAA:

The shipping CAA was created due to overflow of the other CAAs throughout the facility (Photo 1). Most waste goes to other CAAs in the facility as this CAA is not near a point of waste generation. This CAA also holds totes of waste generated from off-spec electroplating material. Facility representatives informed inspectors that Piedmont recently shipped six totes of off-spec material off site. Inspectors observed eye wash stations and spill kits in this area, as well as a fire sprinkler and alarm system throughout the facility. Signs reading "Danger" and "No Smoking" were observed outside of the shipping CAA.

Inspectors observed the following containers in the shipping CAA behind the receiving area shelves:

- One Cardboard Cubic Yard Box (CYB) labeled "Hazardous Waste, Solid, Chromium, toxic, 12/7/2023, NA 3077."
- Two Cardboard CYBs labeled "Hazardous Waste, Solid, Chromium, toxic, solid, organic, methylene chloride phenol, 11/27/2023."
- One 275-gallon tote labeled "Hazardous waste, Cadmium, Liquid, Toxic, 12/7/2023."
- Two 275-gallon totes labeled "Hazardous Waste, Nickel Strip, Pending Analysis." These containers were dated 10/10/2023 and 11/21/2023. When asked about the missing indication of hazards of the contents of the container, facility representatives informed inspectors that the facility did not have a waste profile for nickel strip and a TCLP had been run for both containers with results pending.
- One 250-gallon poly container labeled "Used Oil Only." Facility representatives informed inspectors that used oil is generated from landing gear operations.
- One 15-gallon container labeled "Hazardous Waste, Flammable, Aqueous, 10/30/2023."

- One 30-gallon container labeled “Hazardous Waste, Flammable, corrosive amines, 10/30/2023.” Facility representatives informed inspectors that this material was pending analysis until recently as they had received the TCLP results.
- One 5-gallon drum labeled “Batteries, wet filled with acid, 4/5/2023.”
- One 5-gallon drum labeled “Batteries, dry, sealed, 5/1/2023.”
- One 55-gallon drum labeled “UN1950 Aerosols, Flammable, N.o.s. 2.1”

Inspectors requested that facility representatives relabel two containers of batteries and one container of aerosol cans to contain the words “Universal Waste” or “Used.” These labels were corrected on site (Photo 2).

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.34(a)], which is a condition of the standards for small quantity handlers of universal waste, Universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);”

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.34(f)], which is a condition of the standards for small quantity handlers of universal waste, Universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol cans are contained, must be labeled or marked clearly with any of the following phrases: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s).”

- One 55-gallon container labeled “Hazardous waste, toxic, cadmium, chromium, hazardous coolant.” This container was not dated. Mark Spence informed inspectors that this container was a full SAA container moved into the CAA that morning.

Inspectors informed facility representatives that all SAA containers should be dated when full then brought to the CAA within 72 hours. The container was dated on site.

Pursuant to 15A NCAC 13A .0107(a) [40 CFR 262.17(a)(5)(i)(C)] which is a condition of the LQG Permit Exemption, a large quantity generator is required to mark or label its containers (C) with the date upon which each period of accumulation begins clearly visible for inspection on each container.

Teardown area:

After being processed in the receiving area, parts are moved to the teardown area of the facility. This area is designated for taking apart the parts for further inspection.

Inspectors observed a nonhazardous container of oil absorbents in the teardown area. No hazardous waste is generated here.

The facility manages a CAA near the teardown area. Inspectors observed the following containers in this CAA:

- One 275-gallon tote labeled “Hazardous waste, liquid, chromium, toxic, paint stripper rinse water, 11/22/2023.”

- One 275-gallon tote labeled “Hazardous waste, liquid, chromium, toxic, 11/30/2023.”
- One 55-gallon container labeled “Excluded solvent contaminated wipes” (Photo 3). This container was empty at the time of the inspection, but several other solvent contaminated wipes containers were observed throughout the facility walk through. Facility representatives informed inspectors that Unifirst launders and returns the facility’s solvent contaminated wipes.

Auxiliary Power Unit / Line Replacement Unit (APU/LRU):

The Auxiliary Power Unit (APU) and Line Replacement Unit (LRU) area is designated for inspecting parts for imperfections. Mechanics in this area use Zyglow, a glow in the dark solution to coat the parts. The Zyglow glows to highlight imperfections in the coating (Photo 4). The parts are then rinsed in the sink in this area and the rinsewater is collected in a nearby rinse tank. Inspectors were greeted in this area by Neal Byrd, Balance Technician, and Cody Pertee – Nondestructive Material (NDT) technician. Facility representatives informed inspectors that Zyglow is nonhazardous. Inspectors requested the safety data sheet for Zyglow.

Electroplating Area:

The electroplating area of the facility consisted of three rows of chemical baths for electroplating aviation parts.

Plating/ Main CAA:

The facility manages a CAA in this area as well. Inspectors observed the following in this CAA:

- One 275-gallon tote labeled “Hazardous waste, scrubber water, toxic, 12/05/2023.”
- One 275-gallon tote labeled “Hazardous waste, scrubber water, toxic, 11/30/2023.”
- One 275-gallon tote labeled “Hazardous waste, scrubber water, toxic, 11/27/2023.”
- One 275-gallon tote labeled “Hazardous waste, scrubber water, toxic, 11/23/2023.”
- One 275-gallon tote labeled “Hazardous waste, scrubber water, toxic, 11/17/2023.”
- Three 275-gallon totes labeled “Hazardous waste, cad-strip rinse water, 11/29/2023.”
- One 275-gallon tote labeled “Hazardous waste pending analysis, Nital Etch, 10/20/2023.” Facility representatives informed inspectors that this tote was awaiting TCLP results.
- One 275-gallon tote labeled “Hazardous waste, nickel stripper 10/12/2023.”
- One 275-gallon tote was not labeled with a hazardous waste label. The tote was marked with a taped-on piece of paper with “Cad Rinse 11/29/2023” written in marker. Inspectors requested that representatives mark this container with the words “Hazardous waste” and an indication of the hazards of its contents. This label was corrected during the inspection.

Pursuant to 15A NCAC 13A .0107(a) [40 CFR 262.17(a)(5)(i)(C)] which is a condition of the LQG Permit Exemption, a large quantity generator is required to mark or label its containers (C) with the date upon which each period of accumulation begins clearly visible for inspection on each container.

- One 275-gallon partially full tote labeled “Hazardous waste, corrosive liquid, acidic, inorganic, 9/08/2023” (Photo 8) Mark Spence was unsure why the material was stored in this CAA if partially full. This container was one day away from the 90-day accumulation time limit. Mark Spence explained that material is usually reused, however since they had a shipment coming the day of the inspection, he decided he would ship the material for disposal.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11].

The rinse water tank was in the electroplating area. The tank is aboveground, but in the basement area of the facility so the top of the tank is visible from the floor of the electroplating area (Photo 5). The tank was labeled “NA3082, toxic hazardous waste, liquid, N.O.S. (Chromium), 9, PGII, ERG#171 (D007) (Photo 6). Waste in this tank is generated from the air exhaust scrubber system in the electroplating area. When vapor evaporates from the tank, air is passed through filters which are washed down in a self-contained system. Water is pumped through the system in the wash process and the rinse water is accumulated in the tank.

Facility representatives informed inspectors that the filters are removed and disposed of by Southern Logistics Environmental (SLE). Filters accumulate chrome throughout the scrubber system process and are serviced by SLE when they reach a certain limit.

This tank is inspected daily. Inspectors reviewed the daily tank inspection logs available in this area. These logs documented the date of inspection, cleanliness of the secondary containment, condition of tank system, evidence of leaks, checking the tank was open, and initials of inspector. The inspection logs demonstrated that the tank is inspected daily with no missed inspections.

Inspectors observed free liquids standing in the secondary containment surrounding the tank lid (Photo 9). The daily inspection log for the day of the inspection did not document any free liquids in the secondary containment. Facility representatives informed inspectors that this liquid was spilled over during a transfer of material into totes that occurred before inspectors arrived. This was an area of concern for the facility.

Pursuant to 15A NCAC 13A .0109(k) [40 CFR 264.196(b)(1)] which is a condition of the Tank Systems Permit Exemption, if leaked material released was to a secondary containment system, all released materials must be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment.

East Wall CAA:

The East Wall CAA stored both hazardous waste and product on opposite sides of the CAA.

Inspectors observed the following in the East Wall CAA:

- Three 55-gallon drums of nonhazardous waste
- Two 55-gallon drums labeled “UN2811 hazardous waste, toxic solid, Methylene Chloride, Phenol, 12/05/2023”
- One approximately 55-gallon labeled “hazardous waste, solid, chromium, toxic, 10/30/2023”
- One 12 by 18-inch box labeled “hazardous waste, solid, toxic, chrome, 10/18/2023.”
- One 55-gallon drum labeled “Nonhazardous wax rags”
- One approximately 55-gallon box labeled “waste chrome wax rags 10/08/2023” (Photo 10). This label was corrected on site to include the words hazardous waste and toxic.

Pursuant to 15A NCAC 13A .0107(a) [40 CFR 262.17(a)(5)(i)(B)-(C)] which is a condition of the LQG Permit Exemption, a large quantity generator is required to mark or label its containers (A) with the words “hazardous waste” and (B) an indication of the hazards of the contents.

- One 55-gallon drum labeled “hazardous waste, paint sludge, flammable, 11/27/2023.”

Inspectors observed no smoking signs in this area.

Pursuant to 15A NCAC 13A .0107(a) [40 CFR 262.17(a)(1)(vi)(B)] which is a condition of the LQG Permit Exemption, (B) “No Smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Mark Spence informed inspectors that they had recently implemented a policy to stock pre-printed labels at the point of generation to prevent missing information as with handwritten labels.

Paint Mixing Area:

Parts are repainted prior to assembly in the paint mixing area. Piedmont managed a SAA in this area. This SAA held one 55-gallon drum labeled “UN2811, hazardous waste, toxic, methylene chloride, phenol, spill solids – blasters, beads, etc.” Signs marked “Danger,” and “no smoking” were observed in this area. Inspectors observed two paint booths. Facility representatives informed inspectors that paint sludge and filters generated here are brought directly to the east wall CAA and are not accumulated here. A 5-gallon closed container labeled “excluded solvent contaminated wipes” was observed in this area.

Piedmont manages another SAA in the spray booths near the paint mixing area. Inspectors observed a 10-gallon red drum in the SAA. The wall above the drum was labeled with a hazardous waste SAA label, but the drum was not labeled. This label was corrected on site and the drum was marked with the words hazardous waste and an indication of the hazards of its contents.

Pursuant to 15A NCAC 13A .0107(a) [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 with (i) the words “hazardous waste” and (ii) with an indication of the hazards of the contents.

Media Blasting Room:

A respirator was required to enter this area, so inspectors observed this room through a window in the entryway. The facility uses a glass blasting media to sand blast parts prior to painting. Inspectors observed a partially full satellite accumulation drum connected to the blast machine with a product drum nearby. This drum was not labeled as hazardous waste. Michael Hall, Landing Gear Leader in this area informed inspectors that the satellite drum is filled with dust during the blasting process and is not reused once it is accumulated here.

Pursuant to 15A NCAC 13A .0107(a) [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 with (i) the words “hazardous waste” and (ii) with an indication of the hazards of the contents.

Outdoor SAA:

Three outdoor small storage trailers sat outside of the building. Two of these trailers were empty at the time of the inspection and one stored scrap metal and empty fire extinguishers destined for recycling. One of these trailers was previously designated as another central accumulation area for containers of spray booth filters exhibiting the hazardous characteristic of toxicity for cadmium and chromium. Facility representatives informed inspectors that waste was moved to the inside CAAs by July 25, 2023. The outside CAA had not stored waste since that time but had not officially closed this CAA. Inspectors reminded the facility to put a notice in the facility operating record within 30 days after closure.

Pursuant to 15A NCAC 13A .0107(a) [40 CFR 262.17(a)(8)(i)] which is a condition of the LQG Permit Exemption, a generator must place a notice in the operating record within 30 days after closure identifying the location of the unit within the facility;

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s contingency plan which was last revised in January 2023.

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 describes the names and emergency telephone numbers for persons identified as emergency coordinators. Mark Spence is listed as the primary emergency coordinator with John Koohte and Richard Wilburn as alternates in the order in which they will assume responsibility.

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 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 contingency plan (and its quick reference guide) was documented as submitted to the Guilford County Local Emergency Planning Committee, Greensboro Fire Department, Greensboro Police Department, Greensboro Emergency Medical Services, Southern Logistics Environmental, LLC,

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 facility job descriptions were submitted following the inspection via email. Inspectors reviewed facility job descriptions and employee names that were provided for EH&S Coordinator, RCRA Painter Technicians, RCRA Plating Technicians, RCRA Landing Gear Disassembly Technicians, and Machining, Plating, Grinding (MPG) Manager. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Piedmont 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 RCRA hazardous waste generator training by Workforce Safety Solutions, LLC completed on 11/20/2023. Mark Spence is the employee designated to sign uniform hazardous waste manifests. Inspectors review Mark Spence's DOT training certificate

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since the date of the last North Carolina inspection, July 2023. Hazardous waste manifest records show that hazardous waste exhibiting the hazardous characteristics of EPA waste codes D001, D002, D006, D007, D008, D035, F002, F005, F006, F007, and F009 are routinely shipped to Dart (EPAID: NCD121700777), Heritage Thermal Services (EPAID: OHD980613541), Heritage Environmental Services LLC (EPAID: IND093219012), Republic Environmental Systems Inc (EPAID: PAD085690592), and RINECO Chemical Industries, LLC (EPAID: ARD981057870).

Waste Determination Records:

Inspectors reviewed the hazardous waste determination information for the scrubber water, Zyglow, and nickel waste. The waste profiles demonstrated that the Zyglow is a non-RCRA hazardous material. The scrubber water and nickel waste had both been accurately characterized as hazardous waste.

Weekly Inspection Records:

The inspectors reviewed Piedmont's available records of inspections of the hazardous waste central accumulation areas (CAA) since the date of the last North Carolina inspection, July 2023. The most recent inspection was conducted 12/06/2023. 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 the container conditions and markings, if the universal waste containers are closed, dated, and labeled, if the accumulation point is free of debris, if telephones are accessible and functional, if spill control media is accessible and functional, and the number of containers. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log.

Following the inspection, Mark Spence provided records for shipments of solvent-contaminated wipes being sent off-site for laundering or dry-cleaning. Shipments of excluded solvent contaminated rags were sent to Unifirst on January 19, 2024. Piedmont provided documentation of the name and address of the laundry or dry cleaner that is receiving the

solvent-contaminated wipes and documentation that the 180-day time limit in 15A NCAC 13A .0106(e) (40 C.F.R. § 261.4(a)(26)(ii)) is being met.

Inspectors also reviewed the facility documentation for the most recent shipment of used oil. This documentation demonstrated that 218 gallons of used oil was picked up by Noble Oil on 11/09/2023.

13) Closing Conference

The inspectors conducted the exit meeting at 3:00 PM with Mark Spence. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Piedmont agreed to provide the requested documentation. On 12/27/2023 and 1/9/2024, Mark Spence provided the requested records in an email to Tarin Tischler.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

TARIN TISCHLER Digitally signed by TARIN TISCHLER
Date: 2024.02.23 09:40:34 -05'00'

Tarin Tischler
Life Scientist

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2024.02.23 10:41:00 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

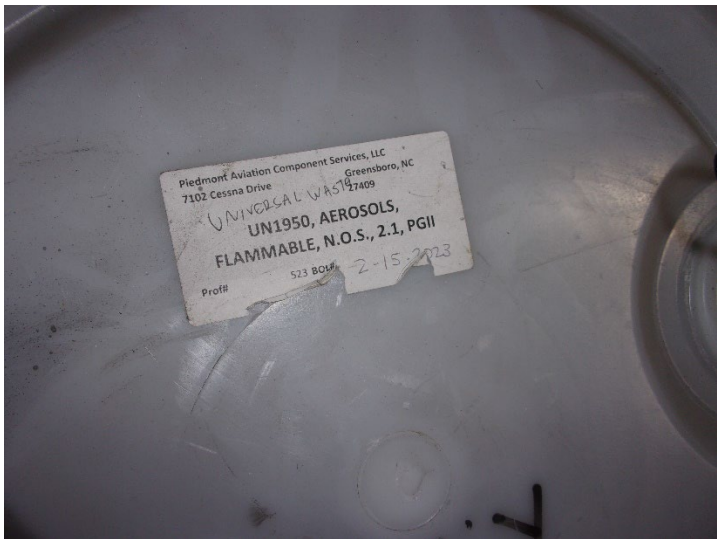
Attachment 1 – Photo Log

10 Photos taken on: December 7, 2023

Photos taken by: Tarin Tischler

Photos taken with: Kodak PIXPRO Fz53

EPA Property Tag: SX9089

	Photo 1 – Containers stored in the Shipping Area CAA.
	Photo 2 – Aerosol container label corrected on site to include the words “Universal Waste.”
	Photo 3 – Excluded solvent contaminated wipes container observed near the teardown CAA.

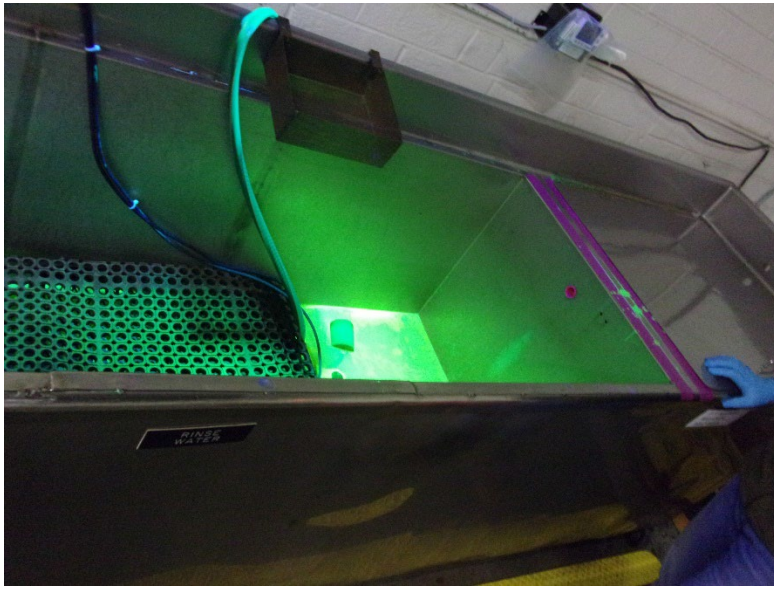


Photo 4 – Sink of Zyglow observed in the APU/LRU area.



Photo 5 – 450-Gallon above ground tank accumulating exhaust scrubber rinse water in the electroplating area.

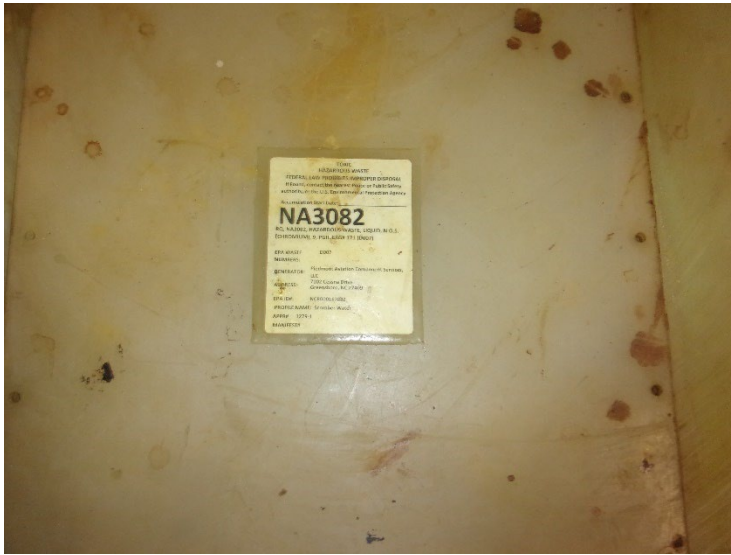


Photo 6 – Label on 450-gallon hazardous waste tank.



Photo 7 – Hazardous waste label on acid material in main CAA. Facility representatives claimed this material was not hazardous waste and should be moved.



Photo 8 – Free liquid observed in aboveground tank secondary containment.



Photo 9 – East wall CAA.

	Photo 10 – container of wax rags in East Wall CAA. The container label was corrected on site to include the words “Hazardous waste” and an indication of the hazards of its contents.
---	--