

RCRA Inspection Report

1) Inspector and Author of Report

Raj Aiyar
Environmental Engineer
RCRA Enforcement Section
Phone: 404-562-8614
aiyar.raj@epa.gov

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

2) Facility Information

Garrett Aviation Services LLC
DBA Standard Aero
1550 Hangar Road
Augusta, Georgia 30906
Richmond County

EPA ID# GAD086972718

3) Responsible Officials

Jeff Cosby, Environmental, Health,
Safety and Sustainability Manager
Jeffrey.cosby@StandardAero.com
(706) 771-5228

Keith Moss
Director of Operations, Air Frames
Garrett Aviation Services LLC
DBA Standard Aero

4) Inspection Participants

Jeff Cosby	Garrett Aviation Services
Sara Porter	GAEPD
Raj Aiyar	US EPA

5) Date of Inspections

October 18, 2023

6) Applicable Regulations¹

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.

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 & 279; Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and Hazardous Waste Permit # HW-26(T&CA)-3

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator (LQG) of hazardous waste 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. § 262.17(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] (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], an 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-.18 [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, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Garrett Aviation Services LLC DBA Standard Aero’s compliance with the applicable requirements of RCRA and the corresponding Georgia Environmental Protection Division (GAEPD) regulations. This was an EPA lead inspection.

8) Facility Description

Garrett Aviation Services LLC (Garrett) operates as a repair and maintenance facility for various business jets. Since April 2022, Garrett has been doing business as StandardAero. Garrett has been in operation for over 40 years and comprises of approximately 11.23 acres. Garrett currently employs approximately 180 personnel. The facility's operating hours are 6:00 a.m. to 1:00 a.m. on Monday through Fridays with occasional weekends. The site is comprised of four buildings that house facility offices, hangars, engine shop, fabrication/accessory shop, metal-bonding shop, accumulation building, tool room, and the paint room.

Facility Process and Hazardous Waste Generation

Garrett Aviation Services LLC performs repair and scheduled maintenance on business jets including metal fabrication, engine overhauling and painting aviation parts. These jet repair and maintenance activities produce hazardous waste mostly in the form of waste paint, spent solvents, used oil and universal waste. The waste codes for most of the waste generated at Garrett are D001 waste however, other wastes are also generated intermittently which includes D002, D005, D006, D007, D035, F003 and F005.

The hazardous waste generated by Garrett is transported by Safety-Kleen Systems (TXR000081205), Clean Harbors Environmental Services Inc (MAD039322250), and Robbie D Wood, Inc. (ALD067138891). The hazardous waste is disposed of by Clean Harbors Deer Park (TXD055141378), Spring Grove Resource Recovery Inc (OHD000816629), and Safety-Kleen Systems, Inc. (KYD053348108). The facility currently has an active Air Quality Permit (Permit No. 3721-245-0167-S-01-0) issued by GAEPD effective since October 31, 2000. Garrett currently does not have any wastewater treatment plant permit and/or a stormwater permit issued by the State.

9) Previous Inspection History

Garrett was last inspected by GAEPD on March 3, 2016. There was one violation involving accumulation of hazardous waste for 90 or less without a permit. The facility returned to compliance on March 22, 2016. There was no prior inspection by EPA at this facility.

10) Opening Conference

On October 18, 2023, EPA Inspector, Raj Aiyar accompanied by GAEPD Inspector, Sara Porter arrived at the Garrett facility at approximately 9:00 a.m. Facility Representative Jeff Cosby, Environmental, Health, Safety and Sustainability Manager immediately received and escorted the inspectors to a conference room. The inspectors were joined by Director of Operations, Air Frame, Keith Moss. The inspectors introduced themselves, showed their credentials, stated the purpose of the visit. The inspectors discussed the scope of the inspection and described the anticipated use of equipment, a digital camera during the inspection. The inspectors later requested a list of records to be reviewed as part of the inspection.

The Small Business Regulatory Enforcement Fairness Act's (SBREFA) classification of a "small business" is generally set by the Small Business Administration. A copy of the EPA's information

sheet for small businesses can be found <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 facility did not assert a business confidentiality claim.

The facility representatives provided an overview of the facility's history and current operations during the opening conference. The inspection participants discussed the health and safety protocols and the required personal protective equipment. The facility representative later led the inspectors on a tour of the facility's operations.

11) Inspection Observations

Satellite Accumulation Areas (SAAs)

Hangar B

One 55-gallon satellite accumulation area (SAA) drum of waste paint-related material was observed at the time of the inspection (Photo-1). The waste code on the container was noted to be D001, D006, D007, D008, D035, F003 and F005. The container was closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents as "Flammable".

Hangar D

One 55-gallon SAA drum of waste paint-related material was observed at the time of the inspection. The waste code on the container was noted to be D001, D006, D007, D008, D035, F003 and F005. The container was closed and was labeled with the words "Hazardous Waste" and an indication of the hazards of the contents as "Flammable".

Tool Room

One 55-gallon SAA drum of waste paint-related material was observed at the time of the inspection on a spill pallet (Photo-2). The waste code on the container was noted to be D001, D006, D007, D008, D035, F003 and F005. The container was closed and was labeled with the words "Hazardous Waste" and an indication of the hazards of the contents. The inspector observed a parts washer unit in the same room. The unit was not in operation during the inspection (Photo-3). According to the facility personnel, the parts washer unit is serviced by Safety-Kleen.

One 1-gallon pail containing flammable (D001) waste was observed hanging from the end of a drip pan at the time of the inspection (Photo-4). The container was not marked with the words "Hazardous Waste". The hazard indication of the contents was labeled as "Flammable Waste". The container was observed to be open and in active accumulation of waste at the time of inspection (Photo-5).

The inspectors observed an open 5-gallon white colored pail hanging from a drip pan actively accumulating waste draining from a drip pan (Photo-6). The inspectors observed waste flammable (D001) liquid in the drip pan as well as D001 waste liquid in the 5-gallon pail. The container was not labeled with the words “Hazardous Waste” or with an indication of the hazards of the contents.

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.

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

There was one 5-gallon orange colored open and unlabeled pail with no hazard indication was also hanging from the end of a drip pan in an adjacent cart (Photo-7). The pail was observed to be empty. There was no accumulation of waste observed during the inspection. The inspectors recommended to the facility personnel that if the pail was used to collect hazardous waste, the container of hazardous waste shall be kept closed except when adding, removing, or consolidating waste and marked with the words “Hazardous Waste” and with an indication of the hazards of the content. The inspectors recommended to the facility personnel that if the pail was used to collect hazardous waste, the container of hazardous waste shall be kept closed except when adding, removing, or consolidating waste and marked with the words “Hazardous Waste” and with an indication of the hazards of the contents.

Paint Room

The inspectors observed two SAAs in this room. One 55-gallon SAA drum contained waste paint-related solid waste. The waste codes on the drum were noted to be D001, D005, D006, D008 and D035. The container was closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

The second 55-gallon SAA drum contained waste liquid paint. The waste codes on the drum were noted to be D001, D005, D006, D008 and D035. The container was closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

Central Accumulation Area (CAA)

Garrett Aviation Services LLC operates one CAA, which is located behind the main building. The CAA was equipped with fire suppression equipment, a spill kit, and secondary containment.

At the time of the inspection, this CAA contained:

- One (1) 55-gallon drum of waste nitric acid
- One (1) 20-gallon container of waste nitric acid
- Three (3) 55-gallon drums of waste paint
- Three (3) 55-gallon drums of waste solids

At the time of the inspection, a 20-gallon container of waste nitric acid (D002) was open and was not labeled with the words “Hazardous Waste” and with no indication of hazards of the contents (Photo-8). The open container of D002 waste was closed at the time of the inspection. There was D002 waste liquid in the secondary containment (Photo-8).

There were three 55-gallon containers of solid waste in the CAA. All the solid waste drums were labeled with the words “Hazardous Waste”. However, the hazard indication on the three drums were observed to be “Class 9 Miscellaneous Hazardous Material”. The hazard indication labels on all three drums failed to reflect the specific hazard associated with the waste. The inspectors stated to the facility personnel that they should provide labels that accurately reflect the characteristic of the contents of the waste stored in the container such as “Flammable”, “Toxic”, and others.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) 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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: 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.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

All other hazardous waste containers in this CAA were observed to be closed with accumulation start dates, labeled with the words “Hazardous Waste” and with indications of the hazards of the contents.

Additionally, at the time of the inspection, the inspectors observed that there was insufficient aisle space in the CAA (Photo-9). The inspectors had difficulty accessing the containers stored in the CAA for the purpose of conducting the inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Other Wastes

There were other wastes stored in the CAA that were not managed as hazardous waste. The inspectors observed one 5-gallon container of Surftec 650 Chromital. The container was closed and labeled with original manufacturer labeling. Based on the waste profile, it was determined to be nonregulated waste.

Two 5-gallon containers of alkaline batteries were stored in the CAA near the universal waste. The containers were closed and labeled. Alkaline batteries are not regulated as universal waste.

One 55-gallon drum of antifreeze was observed at the time of the inspection. The container was closed and labeled with the word “antifreeze”. It was managed as nonhazardous waste.

An unlabeled 275-gallon tote was observed outside of the CAA at the time of the inspection. Facility personnel stated the unlabeled tote contained “TURCO residuals”. The SDS on the Turco indicated that the material was nonhazardous. The inspectors recommended the facility personnel to make proper waste determination and label the container for the purpose of managing their waste properly.

The placard of emergency contacts and the associated contact information mounted on the outside wall of the CAA was observed to be inaccurate at the time of the inspection. While all phone numbers were correct, the EHS Manager’s name on the placard did not reflect the current staffing at the facility. The inspectors stated to the facility personnel to update the information on the placard mounted outside the CAA to reflect the correct and updated information facility wide including the CAA.

Used Oil

Used oil is generated throughout the facility via jet engine oil changes and as part of a general facility wide maintenance. The facility’s used oil is stored in the Tool Room and in the CAA. Empty oil cans are accumulated throughout the facility.

Hangar B

One 55-gallon drum of empty oil cans (Photo-10) was observed adjacent to a SAA drum. The drum was closed and labeled as “oil cans”.

Hangar D

One 55-gallon drum of empty oil cans was observed adjacent to a SAA drum. The drum was closed and labeled with words “oil cans”.

Tool Room

The inspectors observed a 55-gallon drum labeled as “used oil”. The drum was closed and staged on a spill pallet adjacent to a SAA drum (Photo-11).

One 10-gallon container of oily waste was observed at the time of the inspection. The container was closed and labeled with the words “oily waste can”.

Two 15-gallon containers of used oil were observed at the time of the inspection. The containers were labeled with the words “used oil”.

CAA

Four 55-gallon drums of used oil absorbents were observed at the time of the inspection. The containers were closed and labeled with the words “used oil absorbents”.

Six 55-gallon drums of used oil were observed at the time of the inspection on spill pallets. The containers were closed and labeled with the words “used oil”.

At the time of the inspection, there were two used oil drums in the CAA that had oil in the secondary containment below the drums (Photo-12 and Photo-13). **This is an area of concern. Any oil in the secondary containment shall be cleaned up and managed properly to prevent release of used oil to the environment.**

One 55-gallon drum of empty oil cans was observed at the time of the inspection. The container was closed and labeled with the words “oil cans”.

One 55-gallon drum of used oil filters was observed at the time of the inspection. The container was closed and labeled with the words “oil filters”.

Spent Aerosol Cans

Hangar B

There was one 55-gallon closed drum labeled as “Empty Aerosol Cans Collection” adjacent to drum containing oil cans near the SAA container (Photo-14). Upon review of the Safety Data Sheets (SDS) for a spent aerosol can observed in this drum, O’Reilly Break Parts Cleaner was

shown to be a flammable (D001) waste, this waste was not properly characterized as hazardous waste (Photo-15).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in O.C.G.A. §12-8-62(20) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Hangar D

There was one 55-gallon drum of empty aerosol cans was observed at the time of the inspection. The container was closed and labeled with the words “empty aerosol cans”. The facility personnel stated that the contents of the container were not characterized for hazardous waste (Photo-16).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in O.C.G.A. §12-8-62(20) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Universal Waste

Universal waste lamps are generated intermittently throughout the facility via general maintenance activities. Universal waste lamps are accumulated in the CAA.

At the time of the inspection, the CAA contained:

- Nine (9) boxes of universal waste lamps
- Six (6) boxes of 4-foot universal waste lamps
- Two (2) boxes of 8-foot universal waste lamps

All containers of universal waste were closed and labeled with the words “Universal Waste” and with an accumulation start date, with the exception of one 8-foot universal waste lamp box. The 8-foot universal waste lamp box was observed to be open, unlabeled and with no accumulation start date. The 8-foot box was closed, labeled, and dated at the time of the inspection (Photo-17).

Additionally, the accumulation start date for the other 8-foot universal waste lamps container had an accumulation start date of January 17, 2021, which had exceeded the one-year accumulation time limit (Photo-18).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [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.

Universal waste generated by Garrett Aviation Services LLC is managed by Clean Harbors El Dorado, LLC (ARD069748192).

Record Review

Once the inspectors completed the walkthrough of the facility, the inspectors were escorted to a conference room to conduct a review of the required documentation. The records reviewed for a three-year period included the following:

- Contingency Plan and Quick Reference Guide
- Personnel Training
- Weekly Hazardous Waste Inspection Log
- Hazardous Waste Manifests
- Waste Profiles
- Biennial Report
- Hazardous Waste Reduction Plan
- Documents showing emergency arrangement with local authorities
- State of Georgia Air Quality Permit (#3721-245-0167) effective October 31, 2000

Quick Reference Guide (QRG)

The QRG was unavailable for review during the inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262 (b)], A large quantity generator that first becomes subject to these provision after May 30, 2017, or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responder. The quick must include the following elements: (1) The types/names of hazardous waste in layman’s term and the associated hazards associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid) (2) The estimated maximum

amount of each hazardous waste that may be present at any one time (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers (6) The location of water supply (e.g., fire hydrants and its flow rate) (7) The identification of on-site systems (e.g. fire alarm, smoke alarms) (8) The name of the emergency coordinator(s)

Arrangements with Local Authorities

There were no records provided indicating that an attempt was made to make arrangements with the local authorities including local police department, fire department, other emergency response teams, emergency contractors, equipment suppliers and Local Emergency Planning Committee (LEPC).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

Personnel Training

The training records failed to include the names and job titles for each position at the facility related to hazardous waste management.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

12) Closing Conference

An exit briefing was conducted at the conclusion of the inspection. Jeff Cosby, Garrett Aviation, Keith Moss, Garrett Aviation, Sarah Porter, GAEPD and Raj Aiyar, US EPA participated during the exit briefing. The observations made during the inspection were discussed and the inspection

was concluded. Based on the inspection, the facility appeared to be operating as a large quantity generator of hazardous waste.

13) **Signed**

RAJAGOPAL AIYAR

Digitally signed by RAJAGOPAL
AIYAR

Date: 2023.12.15 11:47:58 -05'00'

Raj Aiyar
Environmental Engineer

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.12.15 12:00:20 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Date

Attachment A
Photographs of Garrett Aviation Services LLC
EPA ID# GAD086972718
By: Sara Porter, GAEPD



Photo-1 SAA Drum Hangar B



Photo-2 SAA Drum Tool Room



Photo-3 Parts Washer, Tool Room



Photo-4 Tool Room, Open SAA Container



Photo-5 Tool Room, Waste Accumulation



Photo-6 Tool Room, Open Container with waste accumulation



Photo-7 Tool Room, Empty Pail



Photo-8 CAA Open D002 Waste Container, D002 Waste in Secondary Containment



Photo-9 CAA-Inadequate Aisle Space



Photo-10 Hangar B, Oil Cans



Photo-11 Tool Room Used Oil



Photo-12 CAA- Used Oil in Secondary Containment



Photo-13 CAA- Used Oil in Secondary Containment



Photo-14 Hangar B Empty Aerosol Can Collection



Photo-15 Hangar B Spent Aerosol Cans (O'Reilly)

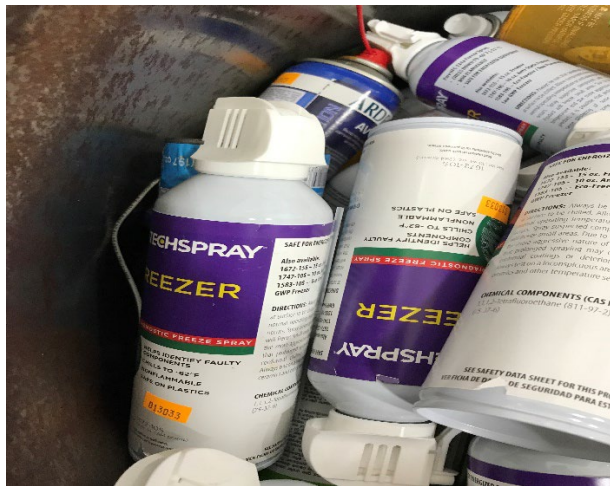


Photo-16 Hangar D Spent Aerosol Cans



Photo-17 Universal Waste Lamp Box(Open)



Photo-18 Universal Waste Lamp
Accumulation Start Date in excess of one year.