

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303

2) Facility Information

Qarbon Aerospace
90 Highway 22 West
Milledgeville, Georgia 31061
Baldwin County

EPA ID: GAD078106846
NAICS: 336413 - Other Aircraft Parts and Auxiliary
Equipment Manufacturing

3) Responsible Official

Edward Pounds
Environmental Health & Safety Manager
Qarbon Aerospace
90 Highway 22 West
Milledgeville, Georgia 31061
edward.pounds@qarbonaerospace.com

4) Inspection Participants

Jaime Brett	Qarbon Aerospace
Tracy Fordham	Qarbon Aerospace
Sara Porter	GAEPD
Scarlett Kastner	GAEPD
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

March 20, 2024, at 9:00 a.m. EDT

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

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.

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.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)], a large quantity generator (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(a)] (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 and/or either one quart of liquid acute hazardous waste 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], 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-.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 the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Qarbon Aerospace, EPA ID Number: GAD078106846 with the applicable regulations. This was an EPA lead inspection.

8) Facility Description

Qarbon Aerospace (formerly known as Triumph Aerostructures, LLC - Vought Aircraft Division) is a Tier 1 manufacturer and supplier of composite and metallic aerostructures components and assemblies, with products installed on the industry's most advanced commercial and military

aircraft.

Qarbon Aerospace which is located at 90 Highway 22 West in Milledgeville, Georgia, was built in 1975 by Northrop Grumman to build the F-14, F-111 and A-6 fighter/bomber jets and the E-2C and EA-6B electronic warfare planes for the U.S. Navy's carrier strike force. Current production includes parts for the Boeing 787, Gulfstream G650 business jet, and the elevators and rudder for Embraer's (E2 E190, E195 and E175 jets. Milledgeville has also built CF-6 transcowls for the Boeing 767, commercial and military, since 1983 as well as flaps, ailerons, and spoilers for the Boeing 777 wings since 1992.

Qarbon Aerospace encompasses approximately 165 acres with 40 acres in production and operates 24 hours per day, 7 days per week in three shifts. Qarbon Aerospace employs approximately 511 full time employees with three employees handling hazardous waste.

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated February 21, 2022, characterized the facility as a large quantity generator (LQG) of hazardous waste. Waste codes from the EPA Form 8700-12 include D001, D002, D005, D006, D007, D008, D035, D040, F002, F003, and U041. The facility notified as a small quantity handler of universal waste and a used oil generator.

9) Previous Inspection History

Qarbon Aerospace has not been inspected for hazardous waste by either the EPA or Georgia Department of Environmental Protection (GAEPD) Hazardous Waste Management Program. However, the former Triumph Aerostructures, LLC - Vought Aircraft Division was last inspected by GAEPD Hazardous Waste Management Program on June 28, 2017, and two deficiencies were noted.

10) Findings

On March 20, 2024, EPA inspector Paula Whiting, accompanied by GAEPD inspectors Sara Porter and Scarlett Kastner arrived at Qarbon Aerospace at approximately 9:00 a.m. EDT. Mrs. Tracy Fordham, Senior Manager of Human Resources, and Mr. Jamie Brett, Facilities Manager, received the inspectors. The inspectors introduced themselves, showed their credentials to Mrs. Fordham, and explained the purpose of the visit.

The inspectors described the anticipated use of a 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 the EPA. The company did not

assert a business confidentiality claim.

Mr. Brett 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. Below is a description of the observations made during the inspection.

11) Inspection Observations

11.1 CF6 Assembly Area

The tour began in Building 1. Each of the areas the inspectors toured represented an airplane component that was being produced.

The inspectors were taken to satellite accumulation areas (SAAs) in the CF6 Assembly Area. The inspectors observed an empty 55-gallon black container labeled for waste solids containing flammable liquids (D006, D007, D035, D040, F002, and F003); a 30-gallon fiberboard container with waste aerosol cans (D001, D007); and a 55-gallon used oil contained with a funnel lid. All containers were observed closed and labeled.

11.2 787 Area

The inspectors observed two 55-gallon containers in the 787 Area (Pictures 1-2). Both containers were labeled for waste solids containing flammable liquids (D006, D007, D035, D040, F002, and F003), and one of the containers was almost full, and the second container was nearly empty. The inspectors explained that only one container should have any hazardous waste inside. The second container should be used once the first container is filled, closed, and dated.

Although Qarbon Aerospace may manage more than one container in the same SAA, please note that the SAA Permit Exemption limits the total volume of waste accumulated in this area at any given time to be no more than 55 gallons. Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

11.3 EMBRAER

The EMBRAER Area had two SAA containers, one 55-gallon container of waste solids containing flammable liquids (D006, D007, D035, D040, F002, and F003), and one 30-gallon fiberboard container of waste aerosol cans. Both containers were observed closed and labeled.

11.4 Building 1 Paint Shop

The inspectors walked through the Paint Shop and observed the following SAAs:

- A black 55-gallon container with a red lid labeled as waste flammable solids.

- A black 55-gallon container with a red lid labeled as waste solids containing flammable liquids (D006, D007, D035, D040, F002, and F003), and a gray trash container with discarded Tyvek™ inside (Pictures 3-5). The inspectors asked Mr. Brett if the discarded Tyvek was normally disposed as hazardous waste. Mr. Brett confirmed that the discarded Tyvek is collected and disposed as hazardous waste. The inspectors then explained that the discarded Tyvek and any other hazardous waste debris placed in the trash can should be removed immediately and placed in the hazardous waste container, otherwise the debris is illegally disposed of.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(9)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.16 [40 C.F.R. Part 268], and is a condition of the LQG Permit Exemption, a generator is required to comply with land disposal restrictions (LDR) for hazardous waste.

- A black 55-gallon container with a red lid labeled as waste solids containing flammable liquids (D006, D007, D035, D040, F002, and F003), and a gray trash container with discarded cheesecloth inside (Pictures 6-7). The inspectors observed discarded cheesecloth in the gray trash containers instead of being placed in the hazardous waste container. Mr. Brett confirmed that the discarded cheesecloth is hazardous waste and should be moved into the hazardous waste container.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(9)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.16 [40 C.F.R. Part 268], and is a condition of the LQG Permit Exemption, a generator is required to comply with land disposal restrictions (LDR) for hazardous waste.

- A two-tier cart with expired material to be moved to the central accumulation area (CAA) (Pictures 8-9);
- Chemical Mixing Booth with a 55-gallon container of waste flammable solids, a 55-gallon container of waste liquid, and a 30-gallon container of flammable aerosol cans;
- Alodine Area with a 55-gallon container of waste solids containing flammable liquids (D006, D007, D035, D040, F002, and F003); and
- Spent paint booth filters are bagged as hazardous waste and taken to the hazardous waste compactor.

Unless otherwise stated, the containers were observed closed and labeled.

11.5 Less than 90-Day Central Accumulation Area

The hazardous waste central accumulation area (CAA) is a standalone building (Picture 10). The inspectors observed that the building had controlled entry and a sign with the legend, “Danger—Unauthorized Personnel Keep Out.” Inside the CAA, the inspectors observed the following:

- 10 closed, labeled and dated hazardous waste containers on pallets (Pictures 11-16). The oldest hazardous waste container date was February 27, 2024;
- 2 closed, labeled and dated non-hazardous waste containers on pallets;
- A 30-gallon container of flammable aerosol cans;
- Two 55-gallon used oil containers were observed labeled and closed. The facility added a start accumulation of February 29, 2024, to this container;
- Containers labeled Paint Cans in Drum (D001, D007, D008); and
- Containers labeled Dirty Paint Thinner Xylene, MEK, Acetone (D001, D007). However, the EPA Waste D005 and F003 were missing on the label but later observed added on the manifest.

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.

- Six of the containers were labeled Trim Room Dust and Debris (Cd, Cr and Pb) with EPA Waste Codes D006 and D007. However, the EPA Waste D008 was missing on the label but later observed added on the manifest.

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.

- A container of Non-Reg Bonderite C-AK53 Non RCRA, dated February 22, 2024;
- A four-foot cardboard box of universal waste fluorescent lamps (Pictures 16-19);
- A four-foot cardboard box of spent light-emitting diode (LED) lamps dated January 29, 2024;
- An eight-foot cardboard box of spent LED lamps dated February 29, 2024;
- An eight-foot cardboard box of universal waste fluorescent lamps dated January 29, 2024;
- Two small boxes of spent incandescent lamps; and
- A 30-gallon fiberboard container of broken lamps marked as Hazardous Waste but not dated and missing the hazard indication. At the time of the inspection, Mr. Brett corrected the container by adding the hazard indication. Mr. Brett emailed a picture of the container with an indication of the hazards of the contents that same day to GAEPD (Picture 26).

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.

Unless otherwise stated, the containers were observed closed, labeled, and dated.

11.6 Hazardous Waste Compactor

The hazardous waste compactor is in an open three-sided building (Pictures 20-25). Discarded paint cans, paint booth filters and bags of waste solid containing flammable liquids collected from the SAAs are placed in the hazardous waste compactor. The inspectors observed that the CAA had controlled entry and a sign with the legend, “Danger—Unauthorized Personnel Keep Out, the secondary containment appeared to be clean with no cracks, a spill kit and fire extinguisher were available, and the compactor was closed, labeled, and dated February 12, 2024.

12) Records Review

The inspectors requested the training records, the contingency plan, the weekly inspection records, the waste minimization plan, the 2020-2024 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated February 21, 2022.

The inspectors requested the training records for Mr. Edward Pounds and Mr. Sean Dunnaway. However, at the time of the inspection, Mr. Pounds was unavailable to personal matter and could not immediately provide the training records. On March 26, 2024, Mr. Pounds emailed his and Mr. Dunnaway’s training records for 2021-2023. Mr. Pounds received the RCRA and DOT Refresher provided by EduWhere on April 20, 2023, April 14, 2022, and April 8, 2021.

Mr. Dunnaway received Qarbon Aerospace RCRA Training Universal Waste annually provided by Mr. Pounds. He also received Hazardous Waste Management: The Complete Course and DOT Hazardous Materials: The Complete Course provided by Environmental Resource Center respectively on July 11-12, 2023, and July 13, 2023. Job titles and descriptions were provided and reviewed.

The inspectors requested the Contingency Response Plan for review. The plan included an emergency contact list, a fire extinguisher inspection list, a list of emergency response equipment, the Quick Reference Guide, and the documentation (i.e., green return receipt cards, emails) that copies of the current contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital). However, an evacuation map was not available. On March 26, 2024, Mr. Pounds emailed the 2024 R18 RCRA Contingency Plan and noted that page 18 shows the evacuation routes.

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. § 262.261(f)], and is a condition of the LQG Permit Exemption, (f) the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.

The 2021-2023 weekly inspection records for the Hazardous Waste CAA and the Hazardous Waste Compactors were reviewed.

The 2024 Waste Minimization Plan was reviewed.

On March 26, 2024, Mr. Pounds emailed the waste profiles for the Bulk Solids Compactor, Aerosols Cans, Dirty Paint Thinners, Trim Room Dust and Debris, Wet Grinding Booth Sludge, Paint Cans in Drums, Resin Part A, and Waste Lab Solvents for review.

Hazardous manifests were reviewed for 2021-2023. Hazardous wastes were shipped to Tradebe Treatment and Recycling of Tennessee (EPA ID TND000772186) in Millington, TN. The compacted hazardous waste was shipped to Hertiage Thermal Services LLC (EPA ID OHD0980613541) in East Liverpool, OH. The land disposal restriction forms were reviewed.

13) Summary

The inspectors conducted the exit meeting with Mr. Brett, Mrs. Fordham, and Mr. David Wilburn, General Manager. During this meeting, the EPA and GAEPD presented the preliminary results of the inspection. Qarbon Aerospace was inspected as a LQG of hazardous waste.

14) List of Attachments

Attachment A – Photo Log: Qarbon Aerospace Protection, Inc.

15) Signed

**PAULA
WHITING**

Digitally signed by PAULA
WHITING
Date: 2024.05.31 13:27:27
-04'00'

Paula A. Whiting
Environmental Engineer

16) Concurrence

ALAN NEWMAN

Digitally signed by ALAN
NEWMAN
Date: 2024.05.31 13:47:10
-04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

QARBON AEROSPACE

MILLEDGEVILLE, GEORGIA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

MARCH 20, 2024

Photos taken by Paula A. Whiting

Camera Type: Olympus Tough

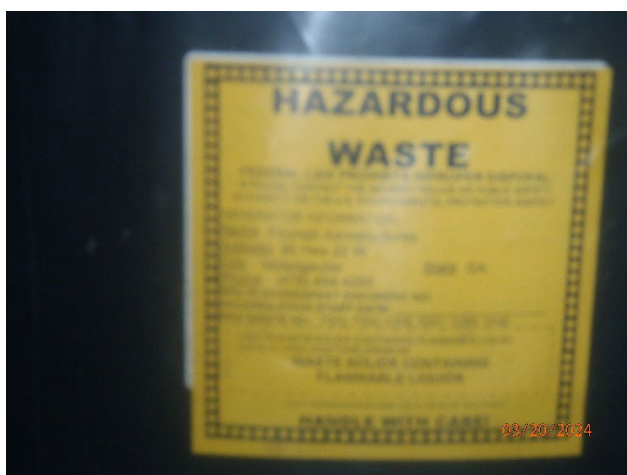
Serial Number: SC7374



Picture 1 – 787 Area SAA



Picture 4 – Paint Shop SAA drum and garbage can



Picture 2 – 787 Area SAA



Picture 5 – Paint Shop SAA drum and garbage can



Picture 3 – Paint Shop SAA garbage can with HW PPE



Picture 6 – Paint Shop SAA garbage can with HW material



Picture 7 – Paint Shop SAA drum and garbage can



Picture 10 – 90-day HWCAA



Picture 8 – Paint Shop expired material cart



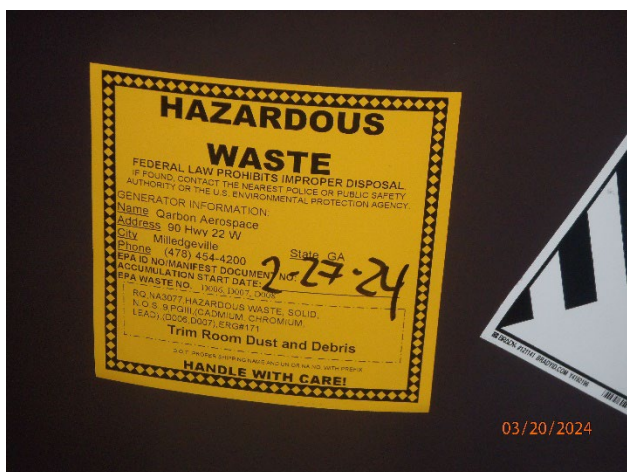
Picture 11 – 90-day HWCAA



Picture 9 – Paint Shop expired material cart



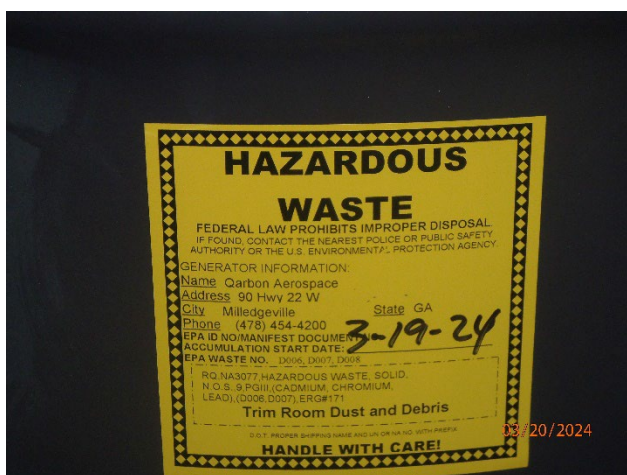
Picture 12 – 90-day HWCAA



Picture 13 – 90-day HWCAA label



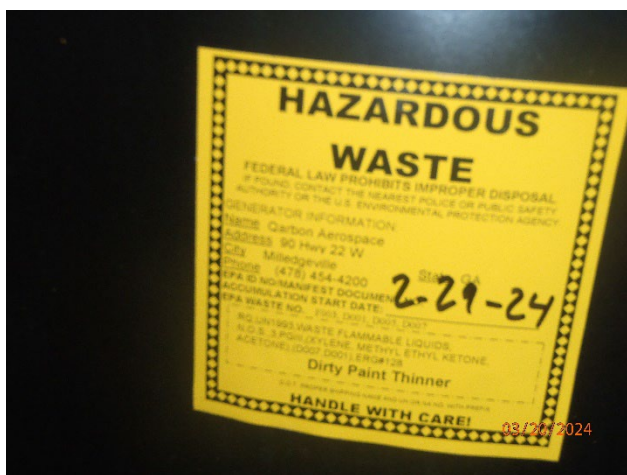
Picture 16 – 90-day HWCAA label



Picture 14 – 90-day HWCAA label



Picture 17 – 90-day HWCAA universal waste storage



Picture 15 – 90-day HWCAA label



Picture 18 – 90-day HWCAA universal waste storage



Picture 19 – 90-day HWCAA universal waste broken lamp



Picture 22 – Hazardous Waste Compactor



Picture 20 – Hazardous Waste Compactor



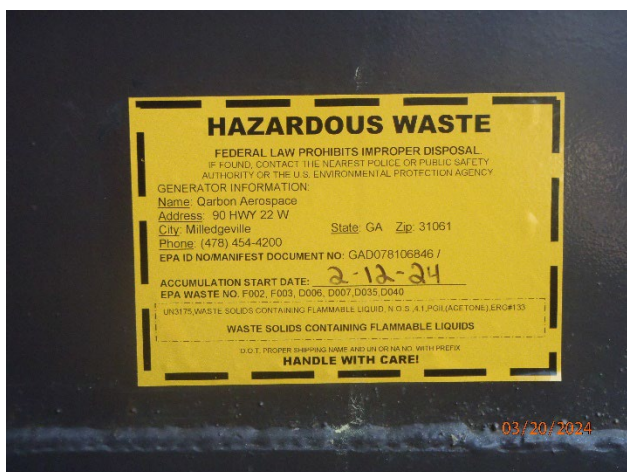
Picture 23 – Hazardous Waste Compactor opening



Picture 21 – Hazardous Waste Compactor



Picture 24 – Hazardous Waste Compactor



Picture 25 – Hazardous Waste Compactor label



Picture 26 – 90-day HWCAA universal waste broken lamp with hazard indication marking