

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency,
Region 4
Enforcement and Compliance Assurance
Division
Chemical Safety and Land Enforcement
Branch
61 Forsyth Street, S.W.
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2) Facility Information

AAR Landing Gear Services
9371 NW 100th St
Medley, Florida 33178

EPA ID # FLD982101933
NAICS # 336413 – Other Aircraft
Parts and Auxiliary Equipment
Manufacturing

3) Responsible Officials

Samuel Akinrosotu
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Environmental Health & Safety
Manager
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4) Inspection Participants

Maria Cordoba
AAR Landing Gear Services
Chemical Engineer

Ross Neubarth
AAR Landing Gear Services
Director NDT Operations

Jason T. Valdez
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Facilities Maintenance Manager

Jeff Gregg Florida Department of
Environmental Protection (FDEP)

David Barreto
AAR Landing Gear Services
Director of Quality

Johanna Polycart, FDEP
Shelby Luong, FDEP

Nereida Hernandez, USEPA Region 4

5) **Date of Inspection**

January 24, 2024

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; Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [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.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine AAR Landing Gear Services compliance with the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection supported by FDEP.

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.

8) **Facility Description**

AAR Landing Gear Services (hereinafter referred as AAR Landing or the facility) is in Medley, Florida. AAR Landing owns other facilities in Medley, Florida with RCRA EPA IDs FLR000227579 and FLR000173054. AAR Landing has been in production since 1986, occupies a 98,793 square feet area, and employs approximately 500 employees. AAR Landing operates three shifts from Monday to Friday and one shift during the weekends. Access to the facility is restricted. The facility is connected to the public water system. Visitors must register at the main office and must be escorted by facility personnel. AAR Landing is involved in repair and services for the military and commercial airplane landing gear. Hazardous waste streams generated during the process include paint waste, paint booth filters, parts washer and evaporator sludge, mineral spirits, spent perchloroethylene, plating waste, electroplating wastewater treatment sludge, steel shot blast media, sulfuric/hydrofluoric acid, isopropyl alcohol, methylene chloride, chrome strip solution, cyanide solution containing carbonate, flammable solids containing methyl propyl ketone (MPK) and toluene, and perchloroethylene-contaminated wax.

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated April 1, 2022, characterized the facility as a large quantity generator (LQG) of hazardous waste. Waste codes from the EPA Form 8700-12 include D001 (ignitable waste), D002 (corrosive), D003 (reactive), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead), D039 (tetrachloroethylene), F001 (spent halogenated solvents), F002 (spent halogenated solvents), F005 (spent non-halogenated solvents), F006 (waste water treatment sludge), and P089 (parathion phosphoric acid, O,O-diethyl-O-(4-nitrophenyl) ester). The facility also generates used oil and generates universal waste.

The facility operates under Air Permit 0250640-031-AV and the Wastewater Permit IWP-000215-2023/2024.

9) **Previous Inspection History**

AAR Landing has been inspected since 1992. The most recent inspection was conducted by the FDEP on May 13, 2021. The inspector found three apparent violations (failure to keep satellite containers holding hazardous waste closed, container in SAA not labeled with the words "hazardous waste", with the indication of the hazardous of the content, and containers in CAA area not marked with the accumulation starting date). All violations were resolved by May 28, 2021.

10) **Opening Conference**

On January 24, 2024, EPA inspector, Nereida Hernandez Morales, accompanied by FDEP inspectors, Jeff Gregg, Shelby Luong, Johanna Polycart, arrived at AAR Landing at approximately 10:15 a.m. After checking-in in the main office, Mr. Jason T. Valdez and Ms. Maria Cordoba from AAR Landing received the inspectors. The inspectors were joined to the opening conference by Mr. Samuel Akinrosotu (by phone), EHS Manager. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a list of records to be reviewed as part of the recordkeeping. 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 asserted a business confidentiality claim due to security risk.

Maria Cordoba provided an overview of the facility's history and current operations during the opening conference. Ms. Cordoba also discussed health and safety protocols and the required personal protective equipment required for the inspection.

11) Inspection Observations

AAR Landing manages one central accumulation area (CAA) and several satellite accumulation areas (SAAs) across the facility. All the waste in the SAAs is moved to a CAAs prior to shipment. The facility's main processes consist of surface coating and cleaning operations.

Emergency showers, eye wash stations, and spill kits were observed around the SAAs and CAA at time of the inspection.

The following areas were inspected:

Quality Assurance/Quality Control (QA/QC) Laboratory:

The QA/QC Lab is located on the second floor and is used to verify the quality of the plating solutions. Cyanide wastes are directed to the cyanide treatment portion of the wastewater treatment plant (WWTP) and the chromium plating wastes are directed to the chromium treatment portion of the WWTP. Expired chemicals (approximately 40 bottles, different sizes) were observed inside a cabinet that was labeled as "Expired Chemical Segregated Area". Expired chemicals are disposed as lab pack. Photo #1.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.210(a)], a trained professional must make the hazardous waste determination, pursuant to § 262.11(a) through(d), before the unwanted material is removed from the laboratory.

Blasting Area:

This area used aluminum oxide to prepare the metals for plating. This area also has the OD steel shot peen unit that used plastic beads to distress the parts. Residual waste from the shot peen unit (tiny pieces of wires that are cut in the machine), were observed on the floor, on cart, and in the drain around the container. According to Ms. Cordoba this residual waste is vacuumed or swept daily and returned to the machine or to the container. The following was observed in the SAAs. Photo #2.

One closed (55)-gallon container with aluminum oxide marked with the words "hazardous waste", and with the indication of the hazards of the contents (toxic).

One (55) gallon container with a closed funnel, with waste steel shot marked with the words "hazardous waste". It was observed that the container was not labeled or marked with the

appropriate hazard indicator. Instead, it was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Recent guidance from the EPA (February 2023), states that the Class 9 DOT label, by itself, does not adequately indicate the hazard associated with the container's content. Photos with drums closed and a pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200 received by email on January 31, 2024. Photo #3.

One opened (20)-gallon container with D006 content was marked with the words "hazardous waste". However, the container was not marked with the indication of the hazards of the contents. Photos with drums closed and a pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200 received by email on January 31, 2024. Photo #4.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

Vapor Degreaser Area:

The vapor degreaser process uses perchloroethylene (perc) to remove any waxy residue on parts before plating. Maintenance to the tank is performed every six months. One closed (55)-gallon container was observed in this area without a label. Photos with drums closed and a pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200, was received by email on January 31, 2024. Photo #5.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(i)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (i) the words "Hazardous Waste", and (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a

chemical hazard label consistent with the National Fire Protection Association code 704).

Plating Area Area:

The plating area consists of seven lines: 2-chrome, one cadmium, three nickel, and one strip. Three SAAs were observed in the plating area as follows:

One closed (55)-gallon container with cadmium/chrome/platin/B and H debris marked with the words “hazardous waste”.

One closed (55)-gallon container marked with the words “hazardous waste”.

On the back of the plating lines, one (55)-gallon container with cadmium/chrome/platin/B and H debris, was observed opened (not properly closed) and marked with the words “hazardous waste”. Photo #6.

It was observed that these containers were not labeled or marked with the appropriate hazard indicator. Instead, it was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Photos with drum closed and a pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200, was received by email on January 31, 2024. Photo #7.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(i)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (i) the words “Hazardous Waste”, and (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Machine Shop Area:

After plating, the parts are cut to size and cleaned using a solvent that generates dirty rags. Used oil is generated when machines are cleaned. Any scrap metal generated during the process is sent back to the military entities or recycled.

Two closed (55)-gallon containers were observed with the words “Used Oil”.

One (55)-gallon container with dirty rags was observed closed, marked with the words “hazardous waste”, and with the indication of the hazard of the contents (flammable solid, MPK toluene).

A shop vacuum is used to occasionally drain used oil; however, the vacuum was not labeled

with the words "Used Oil". Photo #8.

Pursuant to Fla. Admin. Code Ann. R. 62-710.401(6) [40 C.F.R. § 279.221], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Computer Numerical Control (CNC) Machine Shop Area:

The CNC machine is used to perform operational testing. Used oil and dirty rags are generated in this area. One SAA was observed at time of the inspection as follows:

One (55)-gallon container with dirty rags was observed to be closed, marked with the words "hazardous waste", and with the indication of the hazard of the contents (flammable solid, MPK toluene).

One closed (55)-gallon container was observed with the words "Used Oil".

Bushing Installation Area:

Bushing parts are installed in the pipes. One SAA was observed in this area. Dirty rags are generated from parts cleaning.

One (55)-gallon container with dirty rags was observed to be closed, marked with the words "hazardous waste", and with the indication of the hazard of the contents (flammable solid, MPK toluene).

One 55-gallon container with product solvent.

One 35-gallon container with clean rags.

Incoming Condition Report (ICR) Disposition Inspection Area:

Consists of a visual and dimensional inspection on the parts. Parts are also cleaned with solvent, generating dirty rags.

One (55)-gallon container with dirty rags was observed to be opened (not properly closed), marked with the words "hazardous waste", and with the indication of the hazard of the contents (flammable solid, MPK toluene). Photos with drums properly labeled were received by email on January 31, 2024. Photo #9.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

Paint Prep/Paint Shop Area:

This is the paint shop for large parts. The following was observed in this area:

One closed 5-gallon container with used paint rags was observed without labels. Photos with drums (painted black) used for "trash only" were received by email on January 31, 2024. Photo #10.

Two (55)-gallon containers labeled as non-hazardous waste.

One 55-gallon container labeled as clean rags.

One (55)-gallon container with dirty rags was observed to be closed, marked with the words “hazardous waste”, and with the indication of the hazard of the contents (flammable solid, MPK toluene).

One closed (55)-gallon container with paint waste labeled as “Hazardous waste”, and with the indication of the hazard of the contents (flammable liquid).

One (55)-gallon container with paint filters was observed to be closed, marked with the words “hazardous waste”. It was observed that the container was not labeled or marked with the appropriate hazard indicator. Instead, it was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Photos with drums properly labeled were received by email on January 31, 2024. Photo #11.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Small Parts Shop Area:

This area has an additional chromium plating line and two small paint booths. The small part shop is used to inspect and clean the small parts using a solvent. The following was observed in this area:

Three (55)-gallon containers (flammable, MPK toluene with high sludge, paint filters, and cadmium/chrome/plating/b and H debris) were observed and marked with the words “hazardous waste”. Two of these containers were not properly closed, and not labeled or marked with the appropriate hazard indicator. Instead, the containers were labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. One container was not marked with the indication of hazard of the contents. Photos with drums properly labeled were received by email on January 31, 2024. Photo #12.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the

following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Assembly Area:

Parts are put together and washed with solvent that generate dirty rags. The following was observed in this area:

One closed (55)-gallon container with the words "Used Oil".

Two closed (55)-gallon containers with dirty rags marked with the words "hazardous waste", and with the indication of hazard of the contents (flammable solid, MPK toluene).

Two (55)-gallon containers labeled as clean rags.

Two (55)-gallon containers labeled as non-hazardous waste.

Final Inspection Area:

Parts are inspected and cleaned as part of the process. The following was observed in the SAA:

One closed (55)-gallon container with dirty rags marked with the words "hazardous waste", and with the indication of hazard of the contents (flammable solid, MPK toluene).

One (55)-gallon container with a funnel on the top, was observed closed and labeled as "MPK toluene with paint high sludge", marked with the words "hazardous waste", and with the indication of hazard of the contents (flammable liquid).

Two (55)-gallon containers labeled as clean rags.

Two (55)-gallon containers labeled as non-hazardous waste.

Aluminum-Titanium Shop Area:

The facility uses plastic blast and sand blasting to remove paint from the small parts. The following was observed in the SAA:

One closed (55)-gallon container with aluminum oxide was marked with the words "hazardous waste" and with the indication of hazard of the contents (toxic).

One closed (55)-gallon container with "bead blast plastic media" was marked with the words "hazardous waste"; however, it was marked with the incorrect indication of hazard of the contents. It was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Photos with drums properly labeled were received by email on January 31, 2024. Photo #13.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Inspectors also observed a container (small pan-Photo #14) used to collect the bead blast media under the machine before storage in the satellite accumulation area. The container was opened and not labeled with the words “hazardous waste” or the indication of hazard of the contents. This issue was corrected the same day.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(i)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (i) the words “Hazardous Waste” and (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Narrow Body Assembly Area:

Small parts are assembled and cleaned in this area. The following was observed in the SAA:

Two (55)-gallon containers were observed closed and marked with the words “Used Oil”.

One closed (55)-gallon container with dirty rags marked with the words “hazardous waste”, and with the indication of hazard of the contents (flammable solid, MPK toluene).

One (55)-gallon container labeled as clean rags.

One (55)-gallon container labeled as non-hazardous waste.

Military Assembly Area:

Military parts are assembled and cleaned in this area. The following was observed in the SAA:

One (55)-gallon container was observed closed and marked with the words “Used Oil”.

One opened (55)-gallon container with dirty rags marked with the words “hazardous waste”,

and with the indication of hazard of the contents (flammable solid, MPK toluene). Photos with drums properly closed and labeled were received by email on January 31, 2024. Photo #15.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

One (55)-gallon container labeled as non-hazardous waste.

Disassembly Area:

This area is used to wash the large parts using a solvent. The inspector observed the following satellite containers:

Three closed (55)-gallon containers with (dirty rags, isopropyl alcohol, and MPK toluene liquid) marked with the words “hazardous waste”, and with the indication of hazard of the contents (flammable solid and flammable liquid).

One (55)-gallon container was observed with a closed funnel, used to store used oil. The container was not marked with the words “Used Oil” (Photo #16). It was labeled the same day.

Pursuant to Fla. Admin. Code Ann. R. 62-710.401(6) [40 C.F.R. § 279.22I], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Blasting/Shot Peen Units Area:

There are two shot peen units in this area. One of the units has three (55)-gallon containers to collect the waste steel shot and the other one has one (55)-gallon container. The inspectors informed to the facility that the three containers with the same waste stream cannot be considered a satellite accumulation area. Instead, it should be considered a central accumulation area. The containers were observed closed, labeled as “hazardous waste”; however, they were marked with the incorrect indication of hazard of the contents. Labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Photos with drums labeled with the hazard of the content were received by email on January 31, 2024. Photo #17.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(5)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

90 Day Central Accumulation Area (CAA):

The inspectors visited the 90 day CAA located inside the building. The area was identified with a sign that read “Hazardous Waste” and “Chemical Storage Room” at the entrance. This room is also used to store raw material. However, the “No Smoking Sign” was missing in the CAA. There was no adequate aisle space between sections. Approximately, twenty-eight (28) containers with “Used Oil” or hazardous waste material were observed in this area. The containers were observed closed, labeled, and dated. The accumulation starting date ranged from November 2023 to December 2023. Photos were received by email on January 31, 2024 showing the “No Smoking Sign and aisle space between containers. Photos # 18 to #22.

One (55)-gallon container with used oil was not labeled with the words “Used Oil”.

Pursuant to Fla. Admin. Code Ann. R. 62-710.401(6) [40 C.F.R. § 279.22I], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.255], the large quantity generator must 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.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(1)(vi)(B)] the large quantity generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. “No Smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

The CAA is equipped with an internal communication or intercom system capable of providing immediate emergency instruction to facility personnel; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and it is equipped with water to

supply water hose streams.

Universal Waste:

The facility generates universal waste lamps that are stored at another AAR Landing building. The inspectors did not visit the area, but a photo was received by email on February 8, 2024. Photo #23.

12) Records Review:

After the walkthrough, the inspectors reviewed the following records:

Contingency Plan and Quick Reference Guide (QRG):

The facility maintains a contingency plan (CP) that describes the actions that facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste. The Contingency Plan was last revised on January 22, 2024; the plan includes the quick reference guide.

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 generator provides evidence that a Copy of the Hazardous Waste Contingency Plan was submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. 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, and communications and alarm systems. 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.

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 from January 2021 to January 2024. The last shipment was on January 11, 2024, and the facility used Clean Harbor Environmental Services (MAD039322250) as the transporter and Clean Harbors Florida LLC (FLD980729610) was used for the disposal of their hazardous waste.

Used Oil disposed by EMC Oil in Miami Florida. The last shipment was on January 19, 2024.

Waste Profiles:

Waste profile documents were available for review at time of the inspection.

Training Records:

Training records were available for review at the time of the inspection. Job descriptions for each employee handling hazardous waste were available for review. Trainings are up to date.

Weekly and Daily Inspection Records:

AAR Landing is conducting weekly inspections of the CAA. The inspectors reviewed the records of inspections of the CAA from January 21, 2022 to January 22, 2024. The container inspection log included the date and time of inspection, the name of the staff member conducting the inspection, any corrective actions taken, and the total number of containers.

Biennial/Annual Reports Record:

The biennial/annual reports for the facility's hazardous waste activities in 2019, 2021 and 2023 were available to review on-site.

13) Closing Conference

After the inspection, the inspectors had their exit briefing with Maria Cordoba, Jason Valdez, David Barreto, and Ross Neubarth. During the meeting, the inspectors discussed the observations made during the inspection and the inspection was concluded.

14) List of Attachments

Attachment 1 – Photo Log:

Photos taken on: January 23, 2024

Photos taken by: Nereida Hernandez Morales

Photos taken with: Cell Phone

15) Signed

HernandezMorales, Nereida

Digitally signed by
HernandezMorales, Nereida
Date: 2024.02.28 16:35:18 -05'00'

Nereida Hernandez Morales
Life Scientist

16) **Concurrence**

ARACELI
CHAVEZ

Digitally signed
by ARACELI
CHAVEZ
Date: 2024.02.28
17:01:14 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Appendix 1 – Photo Log

Photos taken on: January 24, 2024

Photos taken by: Nereida Hernandez Morales

Photos taken with: Cell Phone

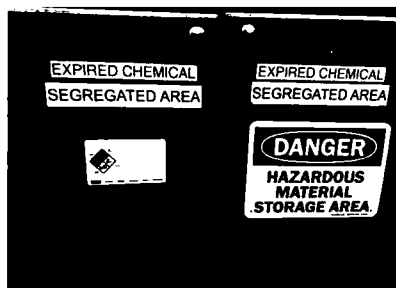
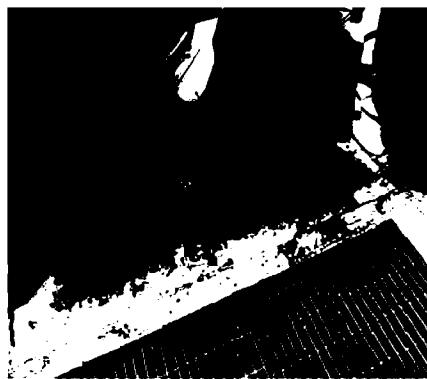


Photo #1 – Cabinet to store the “Expired Chemicals” in the lab

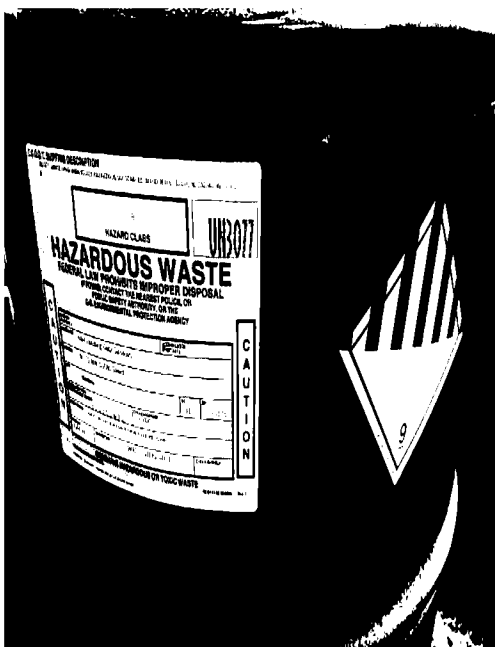


Before



After

Photo #2 – Blasting Area: Residual waste from the machine



Before



Before EPA SW

After

Photo #3 – Blasting Area: container labeled with the Class 9 (miscellaneous)



Blaster Collector – Now with enclosed 55 gal drum

Photo #4 – Blasting Area: opened container, D006 label



Before



Wax

After

Photo #5 – Vapor Degreaser: Container without label



Photo #6 – Plating Area: on the back, open container



Before



After

Photo #7 – Plating Area: container labeled with the Class 9 (miscellaneous)



Photo #8 – Machine Shop: shop vacuum used to occasionally drain used oil



Before



**ICR
After**

Photo #9 – ICR Disposition Inspection



Trash Cans

Photo #10 – Paint Prep/Paint Shop: 5-gallon container without label



Before



Paint Shop
After

Photo #11 – Paint Prep/Paint Shop: Container with Class 9 label



Before



Small Parts Shop
After

Photo #12 – Small Parts Shop:



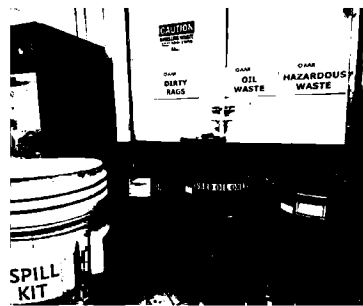
Photo #13 – Aluminum-Titanium Shop



Photo #14 – Aluminum-Titanium Shop: bead blast media



Before



Military Assembly

After

Photo #15 – Military Assembly



Photo #16 – Disassembly: Used Oil Container



Before



After

Photo #17 – Blasting/Shot Peen Units



Before



After

Photo #18 – 90 day CAA



Photo #19 – CAA at time of inspection

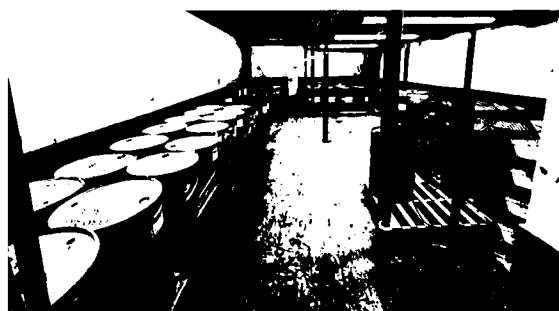


Photo #20 – CAA Organized

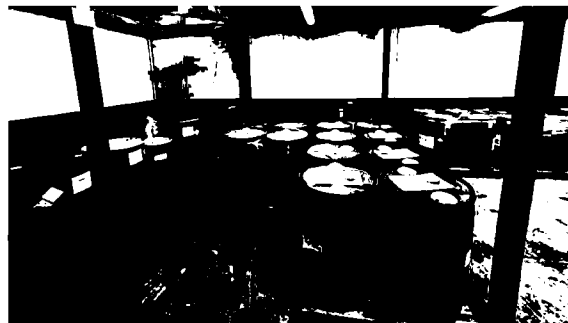
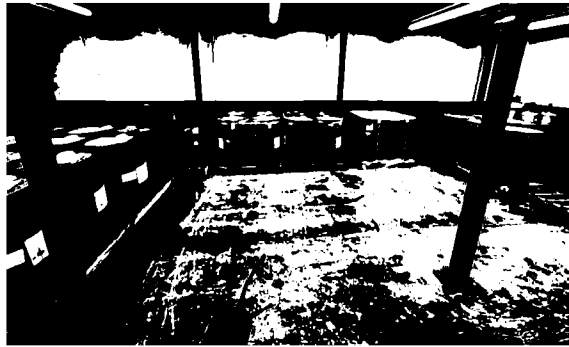


Photo #21 – CAA Organized



Photo #22 – CAA Organized



Photo #23 – Universal Waste Lamps