

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
RCRA Enforcement Section
61 Forsyth Street, S.W.
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2) Facility Information

General Electric Company
1935 Redmond Circle
Rome, Georgia 30165

EPA ID#: GAD003308145
NAICS #: 335311-Power distribution and
specialty transformer manufacturing

3) Responsible Officials

Cody Platt, P.E.
Senior Project Manager
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4) Inspection Participants

Philip Henderson, Remedial Sites Unit,
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Penny Gaynor, Geologist
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5) Date of Inspection

October 5, 2023, at 0922 hours

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; Georgia Hazardous Waste Management Act, 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-043 (S&CA)-3.

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 Ga. Comp. R. and Regs. 391-3-11-.02(1) [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 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, lamps, or aerosol cans, calculated collectively) at any time.

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. § 262.16(b) or § 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(a)] (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”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine General Electric Company’s (hereinafter, GE or the “facility”) compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit HW-043 (S&CA)-3, the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection. The RCRA Hazardous Waste Facility Operating Permit HW-043 (S&CA)-3 (issued on April 9, 2013), is for storage of 18,140 gallons of hazardous waste in containers at the designated container storage areas listed in the permit, and for corrective action for solid waste management units (SWMUs) and areas of concern (AOCs).

8) Facility Description

GE Company is located at 1935 Redmond Circle in Rome, Georgia. Access to the facility is restricted by a closed gate with a security guard that operates 24 hours seven days a week. There are approximately eight contracted employees and two full-time GE employees (one working from home that sometimes visits the facility). The facility is no longer in operation; however, remains open from Monday through Friday due to the ongoing corrective action. The facility is self-identified with the NAICS #: 335311-Power distribution and specialty transformer manufacturing.

GE Company is a former transformer manufacturing facility that closed its manufacturing operations in 1997. The GE facility operated from approximately 1954 to 1997 and produced a variety of medium-capacity electrical transformers. The facility encompasses, approximately 134 acres and is bounded by Redmond Circle, Lavender Drive, residential and light industrial use. During their years of operation, soil and groundwater beneath the facility was affected. Compounds detected in soil and ground water that are associated with past operations include polychlorinated biphenyls (PCBs), chlorinated benzenes, and volatile organic compounds (VOCs).

The facility is federally registered as a large quantity generator of hazardous waste and a small quantity generator of universal waste (batteries, lamps and mercury containing equipment). GE has a hazardous waste permit that authorizes the facility to store the following EPA Waste codes in containers; D001 (decontamination water), D002 (corrosive waste), and D021 (Investigation Derived Waste) at designated container storage areas. The most recent Hazardous Waste Notification is dated February 29, 2016.

The facility has two water treatment systems and three closed capped landfills (Landfills A, B, and C). GE has a Wastewater Discharge permit with the City of Rome (Permit No. 01-19) that expires on November 30, 2024. GE also has a National Pollutant Discharge Elimination System Permit (NPDES Permit No. GA00241555) that expires on June 30, 2026. The NPDES permit authorized GE Company in Rome, Georgia to discharge into an unnamed creek tributary to Horseleg Creek (Outfalls 001 and 002) and an unnamed creek tributary to Little Dr Creek (Outfall 002 and 004) in the Coosa River Basin.

9) Previous Inspection History

GAEPD has conducted RCRA CEIs at the subject facility since 1985. On March 31, 2023, GAEPD conducted the most recent RCRA CEI at the subject facility and no apparent violations were observed during that inspection.

10) Opening Conference

On October 5, 2023, EPA inspectors Nereida Hernandez Morales and Kayla Acosta, accompanied by GAEPD inspectors Philip Henderson and Penny Gaynor, arrived at GE Company. Cody Platt, from GE Company, immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Cody Platt 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 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.

Cody Platt 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 throughout the Facility.

11) **Inspection Observations**

The EPA and GAEPD inspectors visited: Building #3, the Environmental Building, where the water treatment takes place, the universal waste storage area, the central accumulation area (CAA), and the landfills. No hazardous waste was accumulated in any of these areas at time of the inspection.

Building #3:

Building #3 is used as a heavyweight storage warehouse for gas turbines. No hazardous waste is generated or stored in this area.

Treatment Plants:

The inspectors visited the buildings where the groundwater (Photo #1) and stormwater backwash (Photo #2) treatment take place. Sludge PCB waste is generated during the groundwater treatment process. The sludge is removed through a filter press system and accumulated in a “press sludge container” located underneath the filter press. The “press sludge containers” were empty at time of the inspection and labeled with the words “PCB” (Photo #3). No sludge PCB waste or hazardous waste was accumulated at time of the inspection.

Environmental Building- Central Accumulation Area:

The designated hazardous waste storage areas in the Environmental Building were empty. No hazardous waste was accumulated in this building. The hazardous waste storage areas are identified with the following signs: “dangerous, flammable liquid, oxidizer, corrosive, and no smoking” (Photos #4 and #5). In case of emergency, personnel communicate via personal cell phone or via landline phone located in the control room. The facility is also equipped with portable fire extinguishers, fire control equipment, spill control equipment, emergency eye wash station, shower station, and equipped with water to supply water hose streams. There was no hazardous waste or universal waste stored at time of the inspection (Photo #6). According to the records, the facility sent the last shipment of universal waste lamps on September 5, 2023.

Landfills A, B, & C:

Cody Platt also took the inspectors to view the three landfills onsite that are no longer active. Landfill C (Photo #8) was capped in 2006 and Landfills A and B (Photos #7 and #9) were capped in 2017. Healthy vegetation was observed on and around the closed landfills.

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 updated on May 15, 2013.

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 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, 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 most recently submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee on May 15, 2013.

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).

Financial Documents Records:

Financial Documents (performance bond for closure and corrective action and the insurance policy for liability coverage) were reviewed and sent by email to the inspector. The financial documents were current and appeared to be compliant with the permit.

Training Records:

The inspectors reviewed facility job descriptions and employee names. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

GE 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 hazardous waste training completed. Last training was completed June 2023.

Waste Minimization Plan:

The last Waste Minimization Certification was on September 8, 2023.

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 2018. Hazardous waste manifest records show that PCB (Code H132 landfill with prior treatment and/or stabilization) waste is routinely shipped to Chemical Waste Management in Emelle, Alabama (EPA ID ALD000622464), and the most recent shipment was made on August 2, 2023.

Weekly Inspection Records:

The inspectors reviewed GE's available records of inspections of the hazardous waste central accumulation area (CAA) since December 2, 2020 to September 22, 2023. Despite no hazardous waste being stored at the facility on a regular basis, the facility conducts weekly inspections of the CAA and monthly inspections of the fence and monitoring wells. The inspection log includes a checklist to record observations about housekeeping, signage, fire extinguisher, spill response kit, shower, and emergency eye station. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection.

13) Closing Conference

The inspectors conducted the exit meeting with Cody Platt. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Cody Platt agreed to provide financial documents by email. On October 5, 2023, Cody Platt provided the financial documents by email. Financial documents were forward to Corey Hendrix, USEPA Region 4, Financial Assurance Specialist for review. Per Corey Hendrix's reviewed the cost estimate is sufficient to cover the financial assurance obligation for corrective action and closure.

14) List of Appendices

Appendix 1 – Photo Log:

15) Signed

NEREIDA HERNANDEZ MORALES Digitally signed by NEREIDA HERNANDEZ MORALES
Date: 2023.11.30 14:29:22 -05'00'

Nereida Hernandez Morales
Life Scientist

KAYLA ACOSTA Digitally signed by KAYLA ACOSTA
Date: 2023.11.30 14:55:54 -05'00'

Kayla Acosta
Physical Scientist

16) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.12.04 11:01:45 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Appendix 1 – Photo Log

Photos taken on: October 5, 2023

Photos taken by: Nereida Hernandez and Kayla Acosta

Photos taken with: Canon PC 2275 & iPad Serial No. CNF9KQTF36



PHOTO #1 – Groundwater Treatment System



PHOTO #2 – Stormwater Treatment System



PHOTO #3 – Press sludge system and container with “PCB” label



PHOTO #4 – Empty Central Accumulation Area with signs



PHOTO #5 Signs outside the building



PHOTO #6 – Universal Waste Storage Area (Empty)



PHOTO #7 – General view of capped Landfill A



PHOTO # 8 – General view of capped Landfill C



PHOTO #9 – General view of capped Landfill B