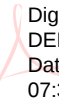


RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	11/13/2023	Inspection Announced: No
Facility or Site Name:	George Industries LLC	
Facility/Site Physical Location:	1 S. Page Avenue	
(city, state, zip code)	Endicott, New York 13760	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	Mathew Greene	General Manager
	matt@georgeindustries.com	
	(607) 748-3371	
RCRA ID Number:	NYD982532251	
Facility/Site Personnel Participating in Inspection:		
George Greene	Above	Above
Inspector(s):		
William Chernes	Chernes, William  Digitally signed by Chernes, William Date: 2024.01.22 11:24:32 -05'00'	
Supervisor:		
Derval Thomas	DERVAL THOMAS  Digitally signed by Derval Thomas Date: 2024.01.22 07:38:32 -05'00'	

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of the inspection was to determine the facility's compliance with the Resource Conservation and Recovery Act. The inspection was conducted by EPA RCRA inspector William Chernes.

Opening Conference

EPA Region 2 RCRA inspector William Chernes arrived at the George Industries LLC facility on November 13, 2023, for an unannounced inspection. I met with Mr. George Greene, General Manager, at the opening conference of the inspection. I presented my credentials to Mr. Greene and informed him that this was an EPA inspection to determine the facility's compliance with RCRA. The scope of the inspection was a compliance evaluation inspection (CEI).

Facility/Site Description

George Industries LLC is an aircraft part manufacturing facility located in Endicott, New York. The facility consumer base is 85% defense industry and 15% commercial. Products are manufactured through either a brazing or machine process. The primary production of hazardous wastes is generated in the brazing process and are collected and disposed of as hazardous waste salts (sludge). The hazardous waste salt sludge contains sodium flouride, lithium and potassium. Hazardous wastes are also generated in a several other processes throughout the facility. After review of the manifest information and statements made by the facility representatives, the facility was determined to be a small quantity generator of hazardous waste at the time of the inspection.

The facility employs approximately 125 individuals, and operates 16-hours a day, 7-days a week.

SECTION II – OBSERVATIONS

Deburring Area

The deburring area utilizes 2 sandblasters to process materials. The deburring sludge gets collected and dried, waste profiles are done on the material frequently. The material was determined to be non-hazardous waste.

Hazardous Waste Storage Area

The hazardous waste storage area contained the following wastes at the time of the inspection:

- Five 55-gallon drums of hazardous waste, four of the drums were not labeled or dated.
- Four 35-gallon drums of hazardous waste, one drum was not dated.
- Four 35-gallon drums of oil contaminated waste, this material goes out as non-hazardous waste.
- One 1-cubic yard container of hazardous waste paint filters, the container was closed, labeled, and dated.
- One broken fluorescent bulb was observed in this area at the time of the inspection, the bulb was not containerized, and therefore was not closed, labeled, or dated.

The hazardous waste storage area did not have an emergency coordinator list posted.

Dip Brazing Pot Area

This area is used to dip products into a salt bath, the dipped products are immediately brought to cool in a nearby area. When the product is conveyed to the cooling area hazardous waste salts are dripped along the floor in this area. The hazardous waste drips are collected in speedy dry, however the hazardous waste mixed-speedy dry was observed scattered across the entire dip brazing pot area. The hazardous waste mixed speedy dry material was also observed outside the dip brazing area most likely from foot traffic in this area. The facility representative said there is not sump or collection system in place to collect the hazardous waste and move it to a proper hazardous waste storage container. (Figure 1)

Hazardous waste sludge is collected out of the dip brazing pot weekly, there was one 55-gallon satellite accumulation container located in this area at the time of the inspection. The satellite drum was not closed or labeled at the time of the inspection.

Boiler Room

The boiler room contains a filtration system for the dip brazing pot process. The 10-micron filter is disposed of in the general municipal waste stream when spent.

Chem-Line Area

The chem-line area is used to clean parts for processing. The area contained soap tanks, rinse tanks, and 2 acid tanks. The 2 acid tanks were approximately 300-gallons each and contained solutions of: one 10% nitric acid, and one 2% nitric acid. Hazardous waste acid was observed on the floor of this area at the time of the inspection, and obvious signs of corrosion of the surrounding concrete and structural supports were observed. The facility does not have a sump system in place to collect the acid waste and convey it to a proper hazardous waste storage container. (Figure 2 and 3)

The area also contained one 55-gallon satellite accumulation container that was closed and labeled, as well as two 275-gallon totes of hazardous waste phosphoric acid from the chem-line, both totes were closed, labeled, and dated. Due to the quantity of waste observed and the duration of time in this area, this area is a 180-day storage. The area contained a fire extinguisher, and the spill kit was replaced at the time of the inspection, however there was no emergency coordinator list present at the time of the inspection.

Paint Shop Area

The paint shop area contained several drums of hazardous waste and was determined to be a 180-day storage area. The area did not have a fire extinguisher, spill kit, or emergency coordinator list present at the time of the inspection. The waste observed in this area at the time of the inspection was as follows:

- One 55-gallon drum of hazardous waste chem film tank filters, the drum was closed, and labeled.
- Three additional 55-gallon hazardous waste drums, all closed and labeled, but were not dated.
- One 5-gallon satellite accumulation container for paint gun cleanouts, the container was not labeled and not closed.

The facility representative stated that the thinners used are recycled and reused in the paint process. The paint shop area also contained a vapor degreaser, the facility representative stated that the degreaser is new and was awaiting a waste profile in order to properly dispose of the waste generated through this process.

Record Review

Manifest and Land disposal Restriction Form

After review of the manifests and land disposal restriction forms, there were no discrepancies to report.

Weekly Container Storage Area Inspections

The weekly container storage area inspections are done weekly for the main 180-day storage area. Weekly inspections were not being done for the 180-day storage areas that were identified during the inspection, these areas include the chem-line 180-day storage area and the paint shop 180-day storage area.

Personnel Training

Personnel training is currently not being conducted for employees handling hazardous waste, as stated by Mr. Greene. Additionally, employee, Dillon Cronk, was signing hazardous waste manifests without training.

Emergency Coordinator List

The facility did not have an emergency coordinator list at the time of the inspection.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 6 NYCRR § 373-3.3(b), Facilities must be maintained and operated 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.

- a. At the time of the inspection, one broken fluorescent bulb was observed in the hazardous waste storage area at the time of the inspection, the bulb was not containerized.
 - b. At the time of the inspection, hazardous waste mixed-speedy dry was observed scattered across the entire dip brazing pot area. The hazardous waste mixed speedy dry material was also observed outside the dip brazing area most likely from foot traffic in this area. The facility representative said there is no sump or collection system in place to collect and transport the hazardous waste to a proper hazardous waste storage container. and move it to a proper hazardous waste storage container.
 - c. At the time of the inspection, hazardous waste acid was observed on the floor of this area, and obvious signs of corrosion of the surrounding concrete and structural supports were observed. The facility does not have a sump system in place to collect the acid waste to convey it to a proper hazardous waste storage container.
2. Pursuant to 6 NYCRR § 373-3.9(d)(1), A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
 - a. At the time of the inspection, there was one 55-gallon satellite accumulation container located in the dip brazing pot area. The satellite accumulation drum was not closed at the time of the inspection.
 - b. At the time of the inspection, one 5-gallon satellite accumulation container for paint gun cleanouts located in the paint shop was not closed.
3. Pursuant to 6 NYCRR § 373-3.9(d)(3), Containers holding hazardous waste must be marked with the words "Hazardous Waste" and with other words identifying their contents.

At the time of the inspection, four 55-gallon drums of hazardous waste located in the hazardous waste storage area were not labeled.

4. Pursuant to 6 NYCRR § 372.2(a)(8)(i)(a)(2), (a) A generator may accumulate up to 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in section 371.4(b), (c) and (d)(5) of this Title 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 interim status and without complying with subparagraph (ii) of this paragraph, provided the generator: (2) marks the containers with the words "hazardous waste" and with other words that identify the contents of the containers.
 - a. At the time of the inspection, there was one 55-gallon satellite accumulation container located in the dip brazing pot area. The satellite accumulation drum was not labeled at the time of the inspection.
 - b. At the time of the inspection, one 5-gallon satellite accumulation container for paint gun cleanouts located in the paint shop was not labeled.

5. Pursuant to 6 NYCRR § 372.2(a)(8)(ii), Except as provided in subparagraphs (iii), (iv), and (v) of this paragraph, a generator may accumulate hazardous waste on-site of generation for a period of 90 days or less under the provisions of section 373.1(d)(1)(iii), (iv), (xix) and (xx) of this Title. The date upon which each period of accumulation begins must be clearly marked and visible for inspection on all containers.
 - a. At the time of the inspection, four 55-gallon drums of hazardous waste located in the hazardous waste storage area were not dated.
 - b. At the time of the inspection, three 55-gallon hazardous waste drums located in the paint shop were not dated.
6. Pursuant to 6 NYCRR § 373-3.3(c), all facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below... (2) a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams; (3) portable fire extinguishers, fire control equipment (including special extinguishing equipment such as that using foam, inert gas or dry chemicals), spill control equipment and decontamination equipment.
 - a. At the time of the inspection, the paint shop 180-day storage area did not have a fire extinguisher present.
 - b. At the time of the inspection, the chem-line 180-day storage area and the paint shop 180-day storage area did not have a spill kit present at the time of the inspection.
7. Pursuant to 6 NYCRR § 372.2(a)(8)(iii)(e)(1), at all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in subclause (4) of this clause. This employee is the emergency coordinator.

At the time of the inspection, the facility did not have an emergency coordinator identified in their operating procedure and did not have any documents to show an emergency coordinator.
8. Pursuant to 6 NYCRR § 372.2(a)(8)(iii)(e)(2)(i-ii), the generator must post the following information next to the telephone: (i) the name and telephone number of the emergency coordinator; (ii) location of fire extinguishers and spill-control material, and if present, fire alarm.

At the time of the inspection, that facility had not posted an emergency coordinator list at any of the three identified 180-day hazardous waste storage areas.
9. Pursuant to 6 NYCRR § 373-3.9(e), At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors.

At the time of the inspection, the weekly container storage area inspections are done weekly for the main 180-day storage area. Weekly inspections were not being done for the 180-day storage areas that were identified during the inspection, these areas include the chem-line 180-day storage area and the paint shop 180-day storage area.

General Concerns

1. Personnel training is currently not being conducted for employees handling hazardous waste, as stated by Mr. Greene. Additionally, employee, Dillon Cronk, was signing hazardous waste manifests without training.

Closing Conference

Inspector Chernes went over the compliance evaluation inspection that had just been conducted at the facility and discussed the various areas of concern. Mr. Greene stated he would remedy the concerns immediately.

Figures:



Figure 1: This figure shows the hazardous waste mixed-speedy dry that was observed scattered across the entire dip brazing pot area. The hazardous waste mixed speedy dry material was also observed outside the dip brazing area most likely from foot traffic in this area. The facility representative said there is no sump or collection system in place to collect the hazardous waste and move it to a proper hazardous waste storage container.



Figure 2: This figure shows the two nitric acid tanks located in the chem-line area. Apparent spill staining observed on the cross platform between the tanks as well as the sides of the tanks.



Figure 3: This figure shows hazardous waste acid observed on the floor of this area at the time of the inspection, and obvious signs of corrosion of the surrounding concrete and structural supports were observed.

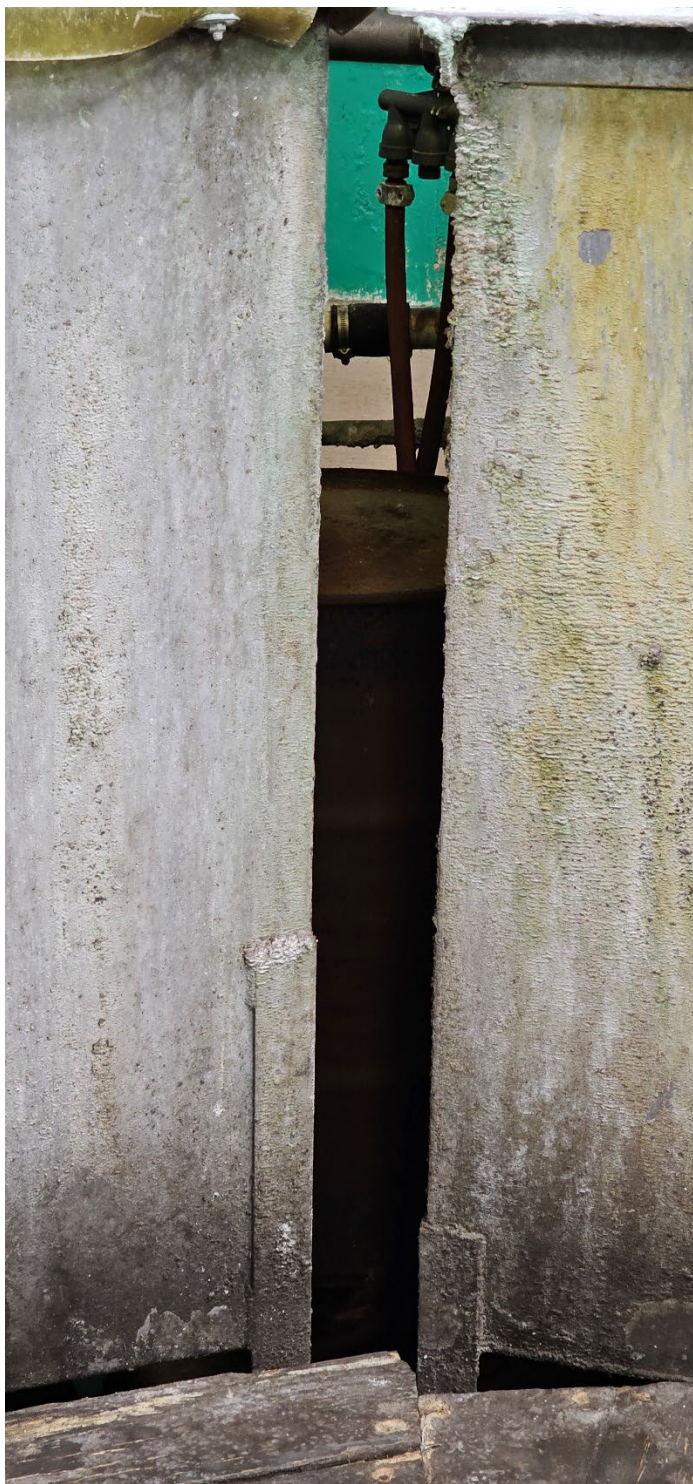


Figure 4: Another photo showing the corrosion and pitting from the acid exposure. A 55-gallon drum was observed severely corroded between the 2 tanks. The facility representative was unsure of the material in the drum or its quantity.