

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	8/15/2022	Inspection Announced: No
Facility or Site Name:	Boeing	
Facility/Site Physical Location:	2 Cranberry Road,	
(City, state, zip code)	Parsippany, NJ 07054	
Mailing address (if different from above):		
(City, state, zip code)		
Facility/Site Contact:	Joseph W. Kelly	GRS Operations Manager
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	(972) 459-2241	
RCRA ID Number:	NJD041215716	
Inspector(s):		
William Chernes	WILLIAM CHERNES  Digitally signed by WILLIAM CHERNES Date: 2022.10.19 09:57:31 -04'00'	
Areeba Khan		
Inspection Report Author		
Areeba Khan		
Supervisor:		
Derval Thomas	DERVAL THOMAS  Digitally signed by Derval THOMAS Date: 2022.10.19 09:44:37 -04'00'	

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

EPA Region 2 identified Boeing as a target for a compliance evaluation inspection (CEI). The purpose of the inspection was to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA). The inspection was conducted by an EPA RCRA inspector William Chernes and Areeba Khan.

Opening Conference

EPA Region 2 RCRA inspector William Chernes and Areeba Khan arrived at the Boeing on August 15, 2022, for an unannounced inspection. We met with Ms. Susan Crawford at the opening conference of the inspection. We presented our credentials to Ms. Crawford and informed her that this was an EPA inspection to determine the facility's compliance with RCRA regulations. The scope of the inspection is to conduct a compliance evaluation inspection (CEI).

Facility/Site Description

Boeing is known for assembling commercial airplanes, defense products and building aerospace components. Aviall was known at the time for providing aviation parts and services in the aerospace industry. Boeing bought Aviall in 2006 and Aviall has become a subsidiary to the parent company Boeing. The facility we went to repaints and repairs operating parts for commercial aircrafts. The facility representative let us know that they will be transitioning into the parent company due to the acquisition. The facility representative also told us that the building had other companies present; the companies included: Aviall, A Boeing Company, IWK Packaging Systems Inc, and Vanderbilt Industries. We only inspected Aviall, A Boeing Company. Hazardous waste is generated from damaged machinery and components.

SECTION II – OBSERVATIONS

The inspection team walked through the facility and went to the cleaning area, paint spray room, small storage area of hazardous waste (quarantine cage) and one large back area for storing hazardous waste.

1. Cleaning area
 - a. The facility cleans wheels or products from different facilities. The waste from the cleaning area is pumped into a drum after waste is collected.
2. Paint spray area
 - a. Hazardous waste is generated in this area as spent paint solvents. The waste solvents are stored in a container.
 - b. Inspector Chernes questioned a facility employee who paints components in the paint booth on where the filters are disposed when spent. The employee stated that the filters are disposed of in the general trash waste stream when spent. This statement was confirmed by Ms. Susan Crawford when asked by Inspector Chernes. We looked at the types of paint solvents used in a cabinet and Inspector Chernes saw that most of the paint solvents had flashpoints lower than 140 degrees fahrenheit and would be listed for D001 (ignitable) if disposed.
 - c. Inspector Chernes requested a copy of the SDS sheets of the solvent-based paints that would be collected within the paint booth filters. Inspector Chernes requested a copy of the hazardous waste determination made on the spent paint booth filters.
3. Quarantine Cage
 - a. The Quarantine cage had signage denoting that it is hazardous waste area.
 - b. Hazardous waste signs are on shelves that are used to manage hazardous waste.
 - c. There were no areas of concern in this area at the time of the inspection.
4. Back area (Central Storage Area)

- a. The Back Area Central Storage Area was well organized and employed the same signage as the quarantine cage. The shelves managing hazardous waste were all properly labeled.
- b. Compatibility charts were placed on the shelves where hazardous waste was stored to ensure compatible storage.
- c. All hazardous waste had SDS sheets on them.
- d. All hazardous waste stored in this area was closed at the time of the inspection.
- e. The facility representative stated that Safety Kleen will determine what wastes will be hazardous at the time of pick-up and will dispose of the wastes as such. Wastes are maintained with SDS until Safety-Kleen picks up.

Record Review

EPA inspectors reviewed the facility records and determined there were no concerns regarding their manifests. Regarding the solvents used in the filter, the SDS sheets were not found for all the solvents used at the time of the inspection, however there were some SDS indicating that the flashpoints to many of the paint solvents were 75 degrees Fahrenheit.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

40 CFR 262.11 as incorporated by reference in N.J.A.C. 7 :26G-6. 1 (a) states that “[a] person who generates a solid waste, as defined in 40 CFR 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations”

At the time of the inspection, the facility did not present documentation or process knowledge proving or disproving the paint booth filters as a hazardous waste. Inspector Chernes requested follow-up regarding this concern but has not received a determination for the paint booth filters.

Closing Conference

The closing conference was attended by the facility representative Ms. Susan Crawford, William Chernes and Areeba Khan. Inspector Chernes requested follow-up regarding the SDS sheets for the solvents and solvent-based paints used in the paint booth area, as well as the hazardous waste determination for the filters in the paint spray booth area.