



ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

October 21, 2022

Nathan Hill, Sr. Manager EH&S

Collins Aerospace

100 Panton Road

Vergennes, VT 05491

Re: U.S. EPA-Region 1 Inspection Report of Collins Aerospace, August 17, 2022

Dear Mr. Hill:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the August 17, 2022 inspection of your facility. Attachment 2 has not been included as the photos are already in the Facility's possession.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1876 or brolin.linda@epa.gov if you have any questions.

Sincerely,

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

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RCRA Compliance Inspection of:

Collins Aerospace
100 Panton Road
Vergennes, VT 05491

August 17, 2022

Date of Inspection

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

October 21, 2022

Date Inspection Report Approved

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

October 21, 2022

Date Inspection Report Finalized

October 21, 2022

Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

- a. **Facility Name:** Collins Aerospace (“Collins” or the “Facility”)
- b. **Inspection Date:** Wednesday, August 17, 2022
- c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)
- d. **EPA Inspectors:** Linda Brolin, Environmental Engineer
Conor O’Brien, Life Scientist
- e. **EPA ID Number:** VTD002068070
- f. **NAICS:** 33641 – Aerospace Product and Parts Manufacturing
- g. **Street Address:** 100 Pantan Road Vergennes, VT 05491
- h. **Mailing Address:** 100 Pantan Road Vergennes VT 05491
- i. **Facility Contacts:** Nathan Hill, Sr. Manager
EH&S and Facilities
Phone: 802-877-4832
Email: Nathan.hill@collins.com
- j. **Generator Status (per RCRAInfo):** Large Quantity Generator (LQG)
- k. **Date first notified as a generator (per RCRAInfo):** 3/30/1990
- l. **Date of most recent notification in RCRAInfo:** 03/11/2022
- m. **Current Property Owner:** Simonds Precision Products Inc.
- n. **Current Operator:** Collins Aerospace
- o. **Wastes generated (per most recent RCRAInfo notification):** D001, D002, D004, D006, D007, D008, D009, D011, D035, F002, F003, F005, F006, F019 and Vermont waste code VT03

Report Attachments:

ATTACHMENT 1 – List of documents requested by EPA

ATTACHMENT 2 – Digital photo log of photos taken by Bill Wager, Collins Aerospace throughout the inspection.

II. FACILITY DESCRIPTION

Simmonds Precision Products, Inc. owns the facility site and Collins Aerospace operates the aerospace component and auxiliary equipment manufacturing plant in Vergennes VT. Collins Aerospace is a manufacturer of aerospace equipment that includes the following: aircraft fuel systems, guidance systems, and health and monitoring of the aircraft, electrical and mechanical assemblies.

The current Collins Aerospace (“Collins”) manufacturing plant was established in Vergennes VT in 1952. The 212,00 square feet manufacturing building is located on approximately 26.4 acres. Collins employs approximately 900 people, with about 600 employees on site. Collins operates three shifts: 7 AM-3:30 PM, 3 PM-11PM and 11PM-7 AM. There is overtime on weekends, as needed.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at Collins Aerospace (“Collins” or the “Facility”) at 100 Panton Road, Vergennes VT at about 9:15 AM on the 17th of August 2022. The inspection team (“inspection team”) consisted of Linda Brolin, Conor O’Brien and Anna Bourakovsky, VT DEC. The inspection team was greeted at the Facility by Bill Wager, who works as the Chief WWTP Operator, Senior Principal Engineer and Acting Facilities Manager at the Facility. Mr. Wager explained that Nathan Hill, Primary Environmental Manager and Senior EHS, was on vacation. The inspection team presented their EPA credentials, signed into the facility, and obtained visitor passes. The inspection team followed Mr. Wager to a conference room, where the opening conference was conducted. Also present during the opening conference was Israel Phelps, Senior Analyst EHS and Harland Miller, Senior Analyst EHS who joined the in-brief at about 9:45 AM. EPA Inspectors exchanged business cards with Facility representatives at this time. The following personnel were present at the in-brief:

EPA:	Linda Brolin, Environmental Engineer Conor O’Brien, Life Scientist
VT DEC:	Anna Bourakovsky, Program Manager, Waste Management & Prevention Division
Collins Aerospace:	Bill Wager, Chief WWTP Operator, Acting Facilities Manager, and Senior Principal Manufacturing Engineer Israel Phelps, Senior Analyst EH&S Harland Miller, Senior Analyst

Linda Brolin explained that the document review will be done off-site and that she would email the Facility with a list of requested documents after the inspection and would include a link to a Share point folder for the facility to upload the requested documents.

The inspection team agreed that Bill Wager would take the photos during the inspection and email them to EPA after the inspection.

Collins Aerospace employees and EPA inspectors discussed the following information about the Facility during the in-brief:

The inspection team first asked the facility representatives for an overview of the Collins Aerospace's operations and the following overview was provided-- Collins Aerospace supplies the following aerospace equipment: fuel systems; guidance Systems; and health usage Monitoring Systems (HUMS) e.g., detect helicopter vibration and indicate when bearings need to be replaced for the aircraft. Collin's products include brake controls, data concentrators, drive shafts and couplings, fire protection, hydraulic actuation, proximity sensing and fuel management systems. These products are used for both commercial and military aircraft. Collins Aerospace is a Federal Aviation Administration (FAA) Repair Certified Facility.

The fuel probes are the only items that are assembled at this facility. The fuel probes are precision drawn aluminum tubing that are profiled and then anodized.

Raw materials that are used at this facility are aluminum (99%), stainless steel and brass.

Hazardous waste is generated during plating, machining, painting operations, soldering and circuit board manufacturing.

The following plating processes are done at this facility: nickel plating (plating electroless nickel on aluminum); aluminum anodizing (anodize aluminum using sulfuric acid); passivation in which they use nitric rather than nitric dichromate, and chemical conversion coating.

When the cleaning tanks are spent, they are sent to the WWTP or are shipped out as hazardous waste. The facility has a pretreatment permit with the City of Vergennes POTW.

Hazardous waste at the facility is stored in one Hazardous Waste Storage Area that consist of three separate Rooms or Bays located in the Facilities Cell of the Plant: the Acid and Caustic Room; the Flammable Storage Room where the acids and caustics are separated and the Universal Room. There are about 48 satellite accumulation areas (SAAs) that have waste profile # 601.

Collins Aerospace generates the following waste streams:

- #601 waste stream includes rags that are off the production line that contain solder, dross, solvents, paint, and paint thinner.
- #127 waste stream is a mixture of water and solvent based paint that is still in the container.
- #128 waste stream is a mixture of water and solvent based paint.
- #129 waste stream is a mixture of mixed acetone and MEK.
- Metal Hydroxide sludge from WWTP.
- Bead Blast goes out as Hazardous waste.
- HEPA filters from the Paint Booths.

The waste is stored in drums, 5-gallon DOT pails and the filters are bagged and put in boxes.

Collins Aerospace is notified as a Large Quantity Generator of hazardous waste. There is a Flammable Room where the acids and caustics are separated.

When asked about manifest requirements, Anna Bourakovsky stated that the Vermont Department of Environmental Conservation no longer requires paper manifests.

The inspection team explained that the records review would be done off-site. The inspection team agreed that Bill Wager would take photos during the inspection and email them.

The opening conference ended at 10:35 am., after which the inspection team followed the facility representatives on the facility walkthrough.

IV. FACILITY TOUR

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 2 for the digital photo log of photos taken by Bill Wager throughout the inspection.

The tour of the Facility took place on Wednesday, August 17, 2022. The following personnel were present for all or part of the tour:

EPA:	Linda Brolin Conor O'Brien
VTDEC	Anna Bourakovsky
Collins	Bill Wager Israel Phelps Harland Miller

Areas inspected (Description and Location):

Acid Caustic Room (Chemical Waste Room on map)

On the door to the Acid Caustic Room, the following signs were posted: "Danger Hazardous Waste Storage Area", "Unauthorized Persons Keep Out", "No Smoking", "Danger Corrosive Materials".

To the right of the door to this Room, there was a telephone, the Plant Evacuation Map, the Emergency Notification Contact List (Thomas Murphy, Emergency Coordinator; Nathan Hill, Alternate Emergency Coordinator; and Boubacar Maige, Alternate Emergency Coordinator), the Daily Checklist and the current Inventory. The Acid Caustic Room has secondary containment.

The following is a diagram representing the storage of hazardous waste containers in the Acid Caustic Room (HWSA) starting on the right side with the following signs posted: “Danger”, “Caustic” and the left side “Danger” “Acid”:

Container J	HALF WALL	Container A	Container D	Containers H
Container K	HALF WALL	Container B	Container E	
Container L	HALF WALL	Container C	Container F	
		Container I		Container G

The following represents the closed waste containers that inspectors observed on the Caustic (right side) of the hazardous waste storage area. The Caustic side and the Acid side are separated by a half wall. The letters correspond to letters in the diagram above.

#A	Container Type/Contents: <ul style="list-style-type: none"> One 55-Gallon drum, Non-hazardous waste, mop water CR04, 7/15/22
#B	Container Type/Contents: <ul style="list-style-type: none"> One 55-Gallon drum, Not regulated as hazardous waste, Aluminum Trihydrate, 7/15/22
#C	Container Type/Contents: <ul style="list-style-type: none"> One 55-Gallon drum, Non-Hazardous waste, Aluminum Trihydrate, 7/15/22
#D	Container Type/Contents:

	<ul style="list-style-type: none"> One 5-Gallon container, Hazardous Waste Solid, Metal Hydroxide Solid, NA 3077, Toxic, F006, F019, 7/15/2022
#E	Container Type/Contents: <ul style="list-style-type: none"> One 55-Gallon drum, Non-DOT Non RCRA Regulated Material, (coolant) 7/22/2022
#F	Container Type/Contents: <ul style="list-style-type: none"> One 55-gallon black steel drum, Non-Hazardous Waste, Mop Water, 8/16/2022
#G	Container Type/Contents: <ul style="list-style-type: none"> One 55-gallon black steel drum, Non-Hazardous Waste, Non-DOT Non-RCRA regulated material, (coolant) #151 Coolant
#H	Container Type/Contents: <ul style="list-style-type: none"> Eight approximately 2 ft. by 2 ft cardboard boxes, Hazardous Waste, Spray Booth HEPA Filters, Toxic, Chromium, D007, Waste profile #632, 7/26/2022
#I	Container Type/Contents: <ul style="list-style-type: none"> One 55-gallon black steel drum, Non-Hazardous Waste label, Waste profile #151 Coolant, 8/3/2022

The following represents the storage of waste containers that inspectors observed on the Acid side (left side) in the Acid Caustic Room.

#J	Container Type/Contents: <ul style="list-style-type: none"> One 55-Gallon drum, Empty
#K	Container Type/Contents: <ul style="list-style-type: none"> One 55-Gallon drum, Universal Waste, Lead Acid Batteries, #641, 2/23/22
#L	Container Type/Contents: <ul style="list-style-type: none"> One 55-Gallon Accumulation Container, Waste profile #196, Plastic Media, Bead Blast Room

The facility schedules pick-ups every month. Tradebe picks up the waste with the following waste profiles: #601, #127, #128.

Inspections of the HWSAs are conducted daily. EPA inspectors requested the inspection logs for the HWSA for the first week of the following months July 2021-July 2022. (See Attachment 1) for full list of documents requested by EPA).

Flammable Storage Room

Across the hallway is the Flammable Storage Room. On the door to this room, the following signs were posted: “Danger Flammable Hazardous Waste Storage Area”, “Unauthorized Persons Keep Out”, “No Smoking”. The facility monitors the Lower Explosive Limit (LEL) in this room. The room has secondary containment. Oxidizers are not allowed in this Room. Also, product is stored on shelves in this Room.

The following is a diagram representing the storage of closed containers in the Flammable Storage Room (HWSA) starting on the left side with the following signs posted: “Danger Flammable Hazardous Waste”.

			Container #4
			Container #5
			Container #6
	Container # 1		Container #7
	Container #2		Container # 8
	Container #3		Container #9
			Container #10
<p>Non conforming material.</p> <p>Material on a rolling cart, with orange “Scrap” labels that denote that they are not fit for Production, but they can and do serve an ancillary use within their business (e.g., in the Facilities Department and in Research and Design.”)</p>			

The following represents the closed containers that inspectors observed in the Flammable Storage Room of the Hazardous Waste Storage Area. The numbers correspond to the containers in the diagram above.

#1-10	<p>Container Type/Contents:</p> <ul style="list-style-type: none"> Ten 55-Gallon drum, Hazardous Waste solids containing Flammable liquids, #601 waste, wipes, filters/solder debris, D001, F003, D006, D008, D007, D035, D011, F005, with the following dates: 8/1/22-8/16/22
#11	<ul style="list-style-type: none"> Non-conforming material that have “Scrap” labels on them. Harland Miller stated that the non-conforming material is useable products that serve an ancillary use within our business (e.g. in the Facilities Department and in Research and Design.” The facility stores the non-conforming material on the rack until they put them into a 601 container/overpack.

Area 13 Dispensing Room

Area 13 Dispensing Room had the following signs posted: “Danger Hazardous Waste Storage Area Unauthorized Persons Keep Out” and “No Smoking”. Product is also stored in this Room. There is a spill kit. The following SAAs that were all labeled, closed, and grounded were located in the Area 13 Dispensing Room:

SAA #128 Hazardous waste, Waste flammable liquid Paint waste and residue (Acetone, MEK, Toluene, Xylene, 737N, Flux, Jet Fuel, D007)

SAA #129 Hazardous waste, Waste Flammable liquid (Isopropanol, Mineral spirits, D001)

SAA Hazardous waste, Waste solids, Flammable liquid (Acetone, Lead, D008)

SAA Hazardous waste, Paint cleaning solution, Waste Flammable liquid, (Acetone, MEK, D007), 7/15/22, waste profile #721

SAA 1 5-gallon Hazardous Waste, Paint and Stripping solvent from the automated paint gun cleaner, 6/1/22

SAA Hazardous Waste satellite station # 10, Flammable waste solids, Solder paste, paint clean up, waste profile #601

SAA Hazardous waste, Flammable liquid, Acetone, MEK, waste profile #721, 8/2/22, D001, D007, D035, F003, F005

Plating Room

Processes in the Plating Room include the following: electroless nickel plating, sulfuric acid anodizing of aluminum, caustic etching of aluminum, acid etching of brass, and passivation of stainless steel. All the floor drains in the Plating Room go to the WWT system. The Plating Room has the following SAAs:

SAA # 1 Hazardous Waste satellite station, Waste Profile #137, one 55-gallon black steel container, Hazardous waste label, Metal Hydroxide solid, F006, F019, Waste Profile #105

SAA #2 One 20-gallon red step can, Hazardous waste satellite station, Waste Profile #601,

Fab Area

The Fab Area is where the probes for the fuel systems are made. There is a remote cleaning system. No hazardous waste was observed on this area.

Wet Chemistry Lab

The Wet Chemistry Lab is located by the Plating Area. The facility runs tests on the plating bath tanks in this lab.

Varnish Dip Room

The varnish dip process is where the metal tubes are dipped into vats containing acetone/polyurethane coating and then dried in curing oven. The Varnish Dip Room has the following SAAs:

One 20-gallon red step can, labeled Hazardous Waste Satellite Station #8, HW profile # 601

Under the Spray hood BH005, there was one 2-gallon closed container labeled, Hazardous waste, Acetone, Chromium and MEK, Waste Profile #128

Tube Fab Area

The Tube Fab Area has the following SAA:

SAA # 10, Hazardous waste, Flammable waste, solder, paste clean up solids, waste profile #601

Universal Waste Area

The following universal waste containers were located in the Universal Waste Area:

There were six closed boxes, labeled Universal Waste lamps with the following dates: 7/8/22, 7/18/22 and 7/29/22.

One 5-gallon closed container, labeled Universal Waste Mercury containing lamps and dated 7/29/22

The facility stated that these Universal waste containers are scheduled to be picked up by Clean Harbors on 8/18/2022.

The ITAR scrap for disposal is shipped to Binghamton, NY for scrap shredding.

WWTP Area

All the floor drains in the facility go to the Wastewater Treatment Plant (WWTP). The following Satellite containers were located in the WWTP Area:

1 55-gallon steel drum, Hazardous waste, Sodium hydroxide sludge/pipes, D002, Waste profile #105

1 55-gallon drum, Hazardous waste, Clarifier Filter Press, Satellite Station #2, Waste profile #192

1 55-gallon black steel drum, Hazardous waste, Satellite Station #1, Plating Pit Sludge, Plating bath, Waste profile #608

1 55-gallon drum, Hazardous waste, Plating Filters with chromium and nickel, Waste profile #159

Satellite station #5 - There was one 20-gallon red step can, Hazardous waste, Waste profile #601

There was a blue metal cabinet that contained “Non-conforming material Caution Corrosive”

The inspection team took a break for lunch at 12 noon and returned at 1pm. The inspection team put on smocks to enter the Production Floor.

Computer Area

The Computer Area is where the facility assembles the computers and tests the computers to see how they interact with the aircraft. The following SAAs were located in a yellow cabinet marked Flammable in the Computer Area:

HW Satellite Station #2, one 3-gallon container, labeled Hazardous waste, Waste Flammable liquid IPA, bench top can, Flammable waste, Waste profile #129

HW Satellite Station #3, One 3-gallon container, labeled Hazardous waste, Waste profile #128 Paint waste and residues, MEK, and acetone

Spray Paint Booth

The Spray Paint Booth uses HEPA filters. The following SAAs were located in the Spray Paint Booth area:

One 30-gallon red step can, Hazardous waste Satellite Station #35, Hazardous waste wipers, filters solder debris (waste profile #601) that includes wiping up towels, gloves etc.

One 5-gallon can which is located in a cabinet marked flammable, Hazardous waste, waste Isopropyl alcohol, Waste profile #129

One 55-gallon red poly container, labeled “Scrap and Leftover” as required material. This material goes out and is shredded.

The Solder Process SAAs were located inside a cabinet marked flammable:

One 5-gallon red container, Hazardous waste label, waste nitric acid, D002

One container, Hazardous waste label, Flux, Corrosive, Waste profile #668

The paint gun cleaners are part of the Air Permit. The fluid is collected and has its own waste code.

General Actuation - Second Paint Booth

The Actuators are painted in this Paint Booth. The following SAAs were located in the General Actuation Department:

HW Satellite Station #27: One 30-gallon red step can, Hazardous waste label, SAA #27, Wipes, filters, solder debris, Waste profile #601

One 5-gallon black container, Hazardous waste label, Acetone, Waste profile #128

E-Brake Cell

Spray Paint Booth 007 is located in the E-Brake Cell. Hexavalent chromium primer is used in all of the spray paint booths. The following SAAs were located in the E-Brake Cell Hazardous Waste Satellite Station #9:

One 30-gallon red step can, Hazardous waste label SAA#9, Wipes, filters, solder debris, Waste profile #601

One 10-gallon container with a Hazardous waste label, Flammable liquid waste, Bulk paint waste, Waste profile #128

Tube Fabrication

The facility has a micro solder and braze area. The actuators are for Bell Helicopters. No hazardous waste was observed in this area.

Health Usage Monitoring Systems (HUMS)

The HUMS area is where the facility does the computer assembly for the black boxes that are used in aircrafts. No hazardous waste was observed in this area.

Repairs Area

This is a Federal Aviation Administration (FAA) Repair Station. The parts are serviced in this area by the Computers Team, Actuator Team and Tank Unit Team.

Boiler Room

The Boilers can use gas or #2 oil. No hazardous waste observed in the Boiler Room.

Final Inspection

This area is for the final inspection of the parts. No hazardous waste was observed in this area.

Kitting Area

The following SAAs were located in a cabinet marked flammable in the Kitting Area:

One 5-gallon closed container labeled, Hazardous Waste, Waste Flammable liquid, Acetone, MEK, D007, Waste profile #128

One 5-gallon closed container labeled, Hazardous waste, Waste Flammable liquid, Isopropanol, Mineral spirits, D001, Waste profile #129

Environmental Engineering Lab

The Environmental Engineering Lab is for the design and development of special projects. No hazardous waste was observed in this area.

Design Services EMI Lab

The Design Services EMI Lab can make “lightning” to test the parts. No hazardous waste was observed in this area.

Engineering Lab

The Engineering Lab is for the design of the next generation of the parts. The Dark Room uses special paints and processes for reflective light in the dark, which is very important for the instrument displays.

This area concluded the walk-through portion of the inspection.

V. RECORDS REVIEW

The inspection team reviewed all documents remotely following the electronic submission made by Collins Aerospace.

Manifests/LDRs

The inspection team reviewed hazardous waste manifests and Land Disposal Restriction notifications from shipments made by Collins Aerospace from March 2022 through to July 2022. Manifests were signed by Harland Miller and Michael Stitt. The manifests were complete, timely and had the destination facility copy.

Inspection Logs

The inspection team reviewed the daily inspection logs for the first week of the following months July 2021- July 2022 for the following HWSAs: Acid/Caustic Room, Flammable Rooms and Universal Waste Room:

Inspections are done daily and include Warning Signs, Container Condition, Container Labels/Markings, Container Arrangement, Containment, Storage Area locked and accessible to authorized personnel only, Ignitable/Reactive Waste, Incompatible Waste, Universal Waste and Used Oil. The Daily Inspections logs were signed by the following individuals: Robert Bowen, Michael Stitt, and Benjamin Andrews.

There were no missing inspections found by the inspection team in reviewing the requested inspection documents.

Training/Job Descriptions

Training attendance logs and job descriptions were reviewed by the inspection team and no deviations from the regulatory requirements were noted. RCRA VT Hazardous waste training was given by ATC Group on October 16, 2020 and October 18, 2021. Harland Miller received RCRA Training on April 19, 2022.

Contingency Plan

Collin Aerospace's Integrated Contingency Plan ("ICP"), revised July 21, 2022 was reviewed by the inspection team and no deviations were noted. The facility provided a copy of the ICP and has agreements with the local Fire Department, Police Department, Hospital, State and Local Emergency Response Teams. Thomas Murphy is the Emergency Coordinator, Nathan Hill is the first Alternate EC; and Mr. Boubacar Maiga is the President and Site General Manager

Permits

Collins Aerospace has the following Permits: Minor source permit (AOP-22-018 issued 6/27/2022) and a Pretreatment Discharge Permit (No. 3-0337 effective date 4/1/2014) for the discharge of treated process wastewater from the metal finishing process to the City of Vergennes POTW.

Requested and received the following Safety Data Sheets:

Aluminum trihydrate (VT99) which is a by-product of wastewater from plating rinse waters (caustic etch out) and (2) Paint spray booth HEPA filters (D007)

VI. INSPECTION OUTBRIEF

An initial out-brief conference was conducted on August 17, 2022, prior to leaving the facility. The following personnel were present:

EPA: Linda Brolin
Conor O'Brien

Collins Aerospace: Bill Wager, Chief Wastewater Treatment Operator and Acting Facilities Manager
Israel Phelps, Senior EHS Analyst

EPA Inspectors noted that the inspection was still ongoing at this point as there were records to be reviewed. EPA then relayed the following areas of concern that arose from observations throughout the inspection.

Container Labeling

1. A container accumulating bead blast was not labeled with the words "Hazardous waste".
2. In the Flammable Storage Room, Non-Conforming material (Product in original closed packaging that is past the expiration date) has orange "scrap" labels on each package and is located on the top of a cart. The inspection team suggested that this material should be put in a container and labeled "Hazardous waste" and that the facility should date the container when the first "scrap" item goes in.
3. In the Flammable Room, there was a 5-gallon carboy that was partially full paint solvent cleaner, with a label that did not identify the hazards. This is a new Vermont Department of Environmental Conservation (VT DEC) rule change where the facility needs to identify the hazards not the contents of the container.

After discussing the above areas of concern, Inspectors reviewed the spectrum of all possible post-inspection follow-up.

Linda Brolin explained that the document review will be done off-site and that she would email the Facility with a list of requested documents after the inspection and would include a link to a Sharepoint folder for the facility to upload the requested documents (See Attachment 1) by the close of business on August 22, 2022.

Following this discussion, the inspection team discussed that an out-brief call with the facility representatives would be done after the records review, between Aug 29-31. (The requested documents were uploaded to a Share point Folder on August 22, 2022.) The inspection team then signed out of the building, and left the premises, which concluded the on-site portion of the inspection.

The Out-brief Conference for the Records Review was held on August 29, 2022 at 10 am by a conference call. The following personnel were present:

EPA: Linda Brolin
Conor O'Brien

Collins Aerospace: Bill Wager, Chief Wastewater Treatment Operator and Acting Facilities Manager
Israel Phelps, Senior Analyst EHS
Harland Miller, Senior Analyst EHS
Nathan Hill, Senior Manager EHS

The inspection team had reviewed the Inspection Records, ICP, Training Records and Manifests. There were no issues identified in the Records review. The inspection team stated that the only Area of concerns from the inspection were the container labeling issues that were discussed at the August 17, 2022 outbrief.

By email dated August 30, 2022 Harland Miller sent a response for the Areas of Concern from the Out-brief Conference call:

Container Labeling

1. A container accumulating bead blast was not labeled with the words "Hazardous waste".

By email dated 8/30/22, Harland Miller sent a picture showing the updated label of this container with the words "hazardous waste" on the label.

2. In the Flammable Storage Room, the Non-Conforming material (Product in original closed packaging that is past the expiration date) had orange "scrap" labels on each package and is located on the top of a cart. The inspection team suggested that this material should be put in a container and labeled "Hazardous waste" and date container when first "scrap" item goes in.

By email dated 8/30/2022, Harland Miller explained that "The orange scrap labels are not associated with the EH&S Department, but are affixed to those containers as part of our Quality Management System. These products are part of our Quality

management system. These products are labeled “SCRAP” to denote they are not fit for production, but they can and do still serve an ancillary use within our business (e.g., in the Facilities Department and in Research and Development). These materials have not been determined to be waste in their current location.”

Correction- The Non-Conforming Material with the Orange “scrap” labels are not waste.

3. In the Flammable Room, there was a 5-gallon carboy that was partially full of paint solvent cleaner, with a label that did not identify the hazards. (This is a new VT DEC rule change where the facility needs to identify the hazards not the contents of the container.)

By email dated 8/30/2022, Harland Miller explained that “the picture provided to EPA titled “20220817_111411” depicts the Hazardous Waste Label with the Hazardous Name “Ignitable”.

Correction - The hazard “Ignitable” was on the label at the time of the inspection.

The only remaining Area of Concern is the Container accumulating bead blast that was not labeled with the words “Hazardous Waste” at the time of the inspection. By email dated 8/30/2022, Harland Miller sent a picture of the updated label. The container accumulating bead blast was labeled with the words Hazardous Waste.