

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

United Technologies Corporation - Pratt & Whitney
17900 Bee Line Hwy
Jupiter, Florida 33478

County: Palm Beach
Latitude: 26° 54' 18.2662"
Longitude: 80° 18' 13.0201"
EPA ID Number: FLD001447952

Primary NAICS: 336415 – Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing
SIC Code: 3764 - Manufacturing - space propulsion units and parts

3) **Responsible Official**

Tyler DeGraff, P&W West Palm Beach EH&S, United Technologies Corporation - Pratt & Whitney
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4) **Inspection Participants**

Parvez Mallick, US EPA Region 4
Justin Stark, Florida Department of Environmental Protection (FDEP)
Romina Lancellotti, FDEP
Tyler DeGraff, P&W West Palm Beach EH&S, United Technologies Corporation - Pratt & Whitney

5) **Dates of Inspection**

August 25, 2021, 10:00 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 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.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

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. 62-730.160(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 the 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(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) **Purpose of Compliance Evaluation Inspection**

On August 25, 2021, Justin Stark and Romina Lancellotti, Florida Department of Environmental Protection (FDEP), and Parvez Mallick, U.S. EPA, conducted a routine compliance evaluation inspection of United Technologies Corporation-Pratt & Whitney (UTC PW or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. UTC PW was represented by Mr. Tyler DeGraff, P&W West Palm Beach EH&S, United Technologies Corporation-Pratt & Whitney. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly 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. The inspection

participants also discussed health and safety protocols and required personal protective equipment before Mr. DeGraff led the inspectors on a tour of the facility operations.

8) **Facility Description**

The United Technologies Corporation-Pratt Whitney (UTC PW), Jupiter, Florida, aerospace installation conducts aerospace propulsion design, development, tests, and repairs for both commercial and military jets. The UTC PW test complex for jet engines contain a component test laboratory, an instrumentation laboratory, and numerous test stands with high-speed data recording. The jet engines tested are primarily manufactured in Farmington, Connecticut and then shipped in pieces for assembly and testing. On April 3, 2020, Raytheon Technologies Corporation announced merger between Raytheon Company and United Technologies Corporation. Upon closing of the merger, United Technologies Corporation's name has changed to Raytheon Technologies Corporation. Currently, Raytheon Technologies Corporation comprises of four businesses-Pratt & Whitney, Collins Aerospace System, Raytheon Intelligence & Space, and Raytheon Missiles & Defense.

UTC PW is located on an approximately 6,800 acres site in the northwest section of Palm Beach County off State Highway 710 (Beeline Highway). The original facilities were constructed to design and develop high-performance jet engines. The main buildings, with more than a million square feet of floor space, were completed in 1958. The plant was expanded a short time later to provide test facilities for rocket engines. In June 2013, the rocket manufacturing and rocket testing operations were sold to Aerojet, a division of GenCorp, and is now operating under the name Aerojet Rocketdyne. Aerojet Rocketdyne continues to operate on the site as a tenant and manages their own waste disposal issues under a separate EPA hazardous waste generator ID. In 2015, Sikorsky Aircraft was sold to the Lockheed Martin Company and they also continue to operate on the site as a tenant and manage their own waste disposal under a separate EPA hazardous waste generator ID.

UTC PW employs about 1,200 people and is connected to city water and sewer. The facility most recently notified FDEP as a large quantity generator (LQG) of hazardous waste, large quantity handler of universal waste, and a RCRA permitted storage facility (Permit #44908-008-HO) on February 20, 2020 and retains EPA identification number FLD001447952. The facility's permit was renewed on December 15, 2017 and will expire on September 17, 2021. The permit is for operation of container storage facility and including provisions for HSWA Corrective Action.

The Container Storage Facility in the manufacturing area of the plant (HWF-14) is currently used for the storage of various hazardous wastes, which are awaiting shipment off-site. The facility is 100 ft. x 100 ft. with an attached 25 ft. x 25-ft. polychlorinated biphenyl waste storage area. The facility is operated to ensure that containers are segregated into areas by the various categories of wastes based on compatibility considerations. There is space for a maximum of 1,444 55-gallon drums (72,200 gallons based on 50 gallons per drum), stored on three-tiered racks. Spills from segregated portions of the drum storage area are collected in sumps. The liquid is manually pumped into an appropriate container for storage prior to treatment or shipment off-site. The types of wastes to be stored in each of the containment areas is determined by Pratt & Whitney identifying numbers and other data on the internal data sheets and the general considerations on incompatible wastes. Handling of containers in the container storage area is accomplished by forklift truck and/or a transport truck equipped with a lift device. At least 16 feet of aisle space is maintained. As a result of the jet engine assembly and testing operations conducted at the

facility, the following waste streams are generated:

Waste Stream Description	Generating Process	EPA Hazardous Waste Code
Ignitable Liquids Including Fuels and Solvents	Production & Testing of Jet Engines	D001, D004, D006, D008, D010, D018, F003, and F005
Spent Solvents; Groundwater Containing Spent Solvents	Production & Testing of Jet Engines; RCRA Corrective Action	D001, D006, D010, D018, D035, D029, D039, D040, D043, F001, F002, F003, F005, U226, and U228
Alkaline Wastes Which Contain Metal	Cleaning Operations, Lab Operations	D002, D006, D007, D008, D009, D010, and D011
Empty Gas Cylinders and Aerosol Spray Cans	Shelf-Life Expiration and/or Normal Use	D001 and D003
Mercury Waste	Broken Bulbs, Thermometers, Etc.	D009
Alkaline Sludge and Debris	Cleaning Operations	D002, D006, and F006
Acid Sludge and Debris	Cleaning Operations, Lab Operations	D002, D006, and F006
Sludge/Debris Which Contains Solvents; Soil Containing Spent Solvents	Degreasing Operations, Solvent Wipes, Adhesives, Epoxies and Coatings; RCRA Corrective Action	D006, D007, D039, D040, F001, F002, F003, and F005
Paint Sludges Which Contain Solvents; Paint Chips and Abrasive Media Mixtures; Powdered Coatings Containing Metals	Painting and Coating Operations	D001, D004, D006, D007, D008, D035, F002, F003, and F005
Wastes Listed in 261.33(e) or 261.33(f) Which Can Be Stored Onsite Prior To Shipment for Offsite Disposal	Discarded Commercial Chemical Product.	Waste stream is reserved for lab pack waste; waste codes vary based on the chemicals being disposed.

Biomedical waste is also generated from the on-site infirmary. It should also be noted that the facility does not receive any waste from off-site. All hazardous waste and non-hazardous waste are generated at this facility. Hazardous waste fuels, oils, solvents, non-corrosive metal sludges, paints, oil/fuel sludges, paint sludges, and their spill residues are stored in metal containers and carbon steel tanks. Corrosive organics, alkalis, acids, plating sludges, and their spill residues are stored in all polyethylene drums (except 70% nitric acid), or steel drums with polyethylene inserts-(except 70% nitric acid), or steel drums with a pliable plastic liner impervious to the material contained.

9) **Inspection Findings**

The inspectors toured the facility with Mr. DeGraff to evaluate used oil, hazardous waste, and universal waste activities and disposal practices. The following areas were inspected: the Administrative Offices/Assembly building, Test Stand C11, C12, C14, Fuel Farm, A-Area, D-Area, Scrap Yard, and the Hazardous Waste Container Storage Building. In the manufacturing area, UTCPW's hazardous satellite accumulation areas (SAAs) are referred as points of

generations (POGs). The wastes generated from these POGs are transported directly to the greater than 90-day storage building when 55-gallons or less drums are full.

Administrative Offices/Assembly Building

The pre-inspection interview and records review were conducted in the administrative offices on the second floor of the building. No hazardous waste was observed in this area.

Test Support

This area is designed for engine repair. Rags, solvents, and used oil/fuel are generated in this area. During the inspection the following were observed:

- One empty 55-gallon container of ignitable spent solvent mixture marked “Hazardous Waste” (D001, D004, D006, D008, D010, D018) this drum was empty;
- One 55-gallon container fuel/oil contaminated absorbents marked “Non-Hazardous Waste;”
- One 55-gallon container of “Used Oil;”

Test Support Storage Area

This area is within the Test Support building and is used for storage. The following were observed:

- One empty 30-gallon container of acid debris solid marked “Hazardous Waste;”
- One empty 55-gallon container marked “Recyclable Materials” for used oil and fuel filters;
- One empty rack marked “Universal Waste-Lamps” for universal waste lamps and devices;
- One 55-gallon container marked “Non-PCB Ballasts or Small Capacitors” holding Non-PCB ballasts or small capacitors; and
- One 55-gallon container of mercury contaminated debris marked “Hazardous Waste” (D009).

A-Area

This area is for military engine testing with several development and production stands. Jet fuel and jet oil are generated in this area. At the time of the inspection the following containers were present in the A-4 Building clam shell within secondary containment:

- One closed 55-gallon non-hazardous waste container marked “Used Oil/Jet Oil;”
- One 55-gallon container of oily rags; and
- One 55-gallon container of blue dye pads marked “Hazardous Waste” solvent contaminated solids (D006, D007, D022, D039, D040, F001-F003, and F005).

At the time of the inspection the following containers were present near the thermal heater in Building 3 (Jet Test Hydraulic/Oil Storage):

- One 55-gallon container of used oil and fuel filters marked “Recyclable Materials;”
- One 55-gallon container of solvent contaminated solids marked “Hazardous Waste” (D006, D007, D040, F001, F002, F005);
- One 55-gallon container holding used oil and jet fuel, marked “Used Oil;”
- One 55-gallon non-hazardous container of fuel/oil contaminated absorbents; and
- One 55-gallon non-hazardous container of ethylene glycol.

Near the A-Area, the following were observed near the storage shed:

- One 35-gallon container of aerosol spray cans marked “Hazardous Waste” (D001 and D003); and
- One 30-gallon container of lab pack marked “Hazardous Waste” (D001, D002, D008, D010, D011, D018, D039, and U228).

All hazardous waste containers in A-Area were closed, marked “Hazardous Waste,” and had an indication of hazards of the contents.

Fuel Farm

The Fuel Farm is used to store jet fuel. Off-loading stations are contained with drains that lead to an oil/water separating system. During the inspection, the inspectors observed the following:

- Two 1-million-gallon jet fuel tanks;
- One 100,000-gallon back-up jet fuel tank; and
- One 55-gallon container of jet fuel/oil contaminated absorbents marked “Hazardous Waste” debris. The container was closed and had an indication of hazards of the contents.

Test Stand C-11

C11 is used for commercial engine testing only. Jet fuel is used to power the engines through welded stainless steel above ground fuel lines from the fuel farm. Jet fuel is either burned or it flows back into the system. Clam shells located near each test stand are used as a POG mainly for used oil rags. During the inspection, the inspectors observed the following:

- One closed 30-gallon container of aerosol cans marked “Hazardous Waste” (D001 and D003). The container was not marked with an indication of the hazards of the contents (Photo #1);
- One 30-gallon container marked “Hazardous Waste” holding a lab pack. The container was marked with an indication of the hazards of the contents;
- Two 55-gallon containers holding “Used Oil;” and
- Two 55-gallon containers marked “Non-Hazardous Waste” holding fuel/oil contaminated absorbents.

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 containers 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 C.F.R. 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 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Test Stands C12-C14

C12 and C14 are used to test both commercial and military jet engines for such scenarios as cross wind, ice ingestion, and bird encounters. All test stands are equipped with double secondary containment. The following were observed at C12-C14:

- One 55-gallon container holding Used Oil/Jet Oil
- One 55-gallon container holding “Used Oil;” and

- One 30-gallon container of aerosol cans marked “Hazardous Waste” (D001, and D003). The container was not marked with an indication of the hazards of the contents.

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 containers 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 C.F.R. 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 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Scrap Yard

This area is dedicated to wood recycling and stores scrap metal. Near the scrap yard is a closed landfill from the early 1980’s which is surrounded by monitoring wells. The following were observed during the inspection:

- One 55-gallon container holding “Used Oil;”
- One 55-gallon drum holding antifreeze;
- One 55-gallon drum marked “Non-Hazardous Waste” holding fuel/oil contaminated absorbents;
- One 55-gallon container holding used oil filters;
- One 30-gallon container marked “Hazardous Waste” holding aerosol cans (D001 and D003). The container was not marked with an indication of the hazards of the contents (Photo #2); and
- Approximately 50 containers for scrap metal for recycling.

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 containers 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 C.F.R. 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 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Hazardous Waste Container Storage Facility (HWF-14)

The Hazardous Waste Container Storage building is completely enclosed with fencing and a gate. Hazardous waste containers can be stored for no more than one year. The facility ships out hazardous waste from the storage building 3-4 times a year. Near the building the inspector observed the following:

- One 2,500-gallon double-walled above ground storage tank for used oil. The tank was marked “Used Oil;”
- One 2,500-gallon double-walled above ground storage tank for used oil and water. The tank was marked “Oily Water;”
- One 550-gallon double-walled above ground storage tank for used coolant. The tank was marked “Used Coolant.”

The container storage building has a berm surrounding it to prevent any discharge and is also equipped with secondary containment in the form of self-contained sumps within the building. Hazardous Waste signage and emergency contacts are displayed on the building doors. Evacuation maps are also displayed on the walls of the building. Inside the containment building is a staging area where hazardous waste is first weighed and then logged into a computer tracking system. Spill equipment, eye wash stations, emergency shower stations, and fire extinguishers are available within the building and outside of the building. The inspectors observed the following:

Bay 5-A

- Three closed 55-gallon containers of non-hazardous fuel/oil contaminated absorbents dated 8/20/21, 8/19/21, and 8/19/21.

Bay 5-B

- Three closed 55-gallon containers of non-hazardous fuel/oil absorbents. The containers were dated 8/24/21.

Bay 6-A

- Four closed 55-gallon containers of “Hazardous Waste Toxic” dated 8/16/21. The waste containers were generated in various test areas and pending waste analysis.

Bay 6-C

- Three closed 55-gallon containers of waste generated in the New Fabrication Shop. The containers were dated 8/16/21, marked “Hazardous Waste Toxic” and “Waste Analysis Pending.”

Bay 8

- One 35-gallon container of flammable waste aerosol cans (D001 and D003). The container was closed and dated 7/26/21 but was not marked with an indication of hazards of the contents.

Bay 9

- Eight closed 55-gallon containers of non-hazardous waste corrosive liquid, the earliest accumulation date was 8/16/21.
- Twelve 55-gallon drums of non-hazardous recycling material.

Bay 10

- Twelve closed 55-gallon containers of “Hazardous Waste” solvents containing solids (D006, D007, D022, D035, F001, F002, and F005). The earliest accumulation date was 7/7/21. The containers were closed but two of the containers did not have indication of hazards of the contents.

Bay 12

- Two closed 1-gallon container of “Hazardous Waste” paint waste (D001, D004, D006, D007, D008, D018, D022, D035, F002, F003, and F005). The earliest accumulation date was 7/22/21. The containers did not have an indication of hazards of the contents.

Bay 13

- Two closed 55-gallon containers of solvent contaminated ground water (D018, D029, D039, D040, D043, F001, F002, U226, and U228). The containers were marked “Hazardous Waste Toxic” and dated 4/27/21 and 5/26/21;
- One closed 2-gallon container of halogenated solvent and solvent mixture. The container was marked “Hazardous Waste Toxic” and dated 7/6/21; and
- One closed 1-cubic yard container of “Universal Waste” lamps dated 7/13/21.

Bay 14

- Four closed 55-gallon containers of non-hazardous 3% hydrogen peroxide;
- One closed 55-gallon container of non-hazardous oily sludge; and

- One closed 55-gallon container marked “Used Oil/Fuel Filter.” The container was dated 8/3/21.

Bay 15

- Two closed 55-gallon drums of “Hazardous Waste” commercial alkaline solution (D002, D006, D007, and D008). The earliest accumulation date was 8/23/21 and hazards of the contents were marked on the containers.

Bay 16

- Two closed 5-gallon containers of alkaline debris/solids (D010). The containers were marked “Hazardous Waste Toxic” with start accumulation date of 8/5/21 and 7/16/21.

Bay 17-B

- One 55-gallon container of recyclable materials (misc. electronics) dated 7/14/21;

Bay 18

- Six closed 20-gallon “Hazardous Waste Toxic” lab packs dated 7/7/21, 5/14/21, 6/14/21, 6/8/21, 6/24/21, and 6/24/21;
- One closed 55-gallon “Hazardous Waste Toxic” lab packs dated 7/7/21;
- Two closed 5-gallon “Hazardous Waste Toxic” paint (D001, D002, D008, D011, D034, and U228) containers both dated 6/17/21.

Bay 18-C and D

- Two closed pallets of “Hazardous Waste Toxic” lab packs dated 5/10/21 and 7/28/21;
- Six 20-gallon yellow “Hazardous Waste” lab packs dated 7/22/21, 7/26/21, 7/5/21, 6/24/21, 7/26/21, and 7/5/21. Three lab packs did not have hazard contents marked on the lab packs;
- Two 10-gallon buckets of white lithium ballasts dated 2/13/21 and 8/23/21.

Bay 19-A

- Two 55-gallon spent nickel batteries awaiting analysis.

Bay 19-C

- One 55-gallon miscellaneous radioactive materials awaiting analysis, dated 8/16/21.

Bay 20

- Two pallets of lead acid batteries. The pallets were marked “Universal Waste” batteries and dated 7/13/21 and 7/26/21.

Bay 20-A

- One closed 2x2x2 card-board box contained “Universal Waste” lamps dated 7/8/21.

PCB Area:

- One closed 55-gallon container of “Hazardous Waste PCB.” The accumulation date was 8/19/21 but an indication of hazards of the contents was not present on the container.

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 containers 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 C.F.R. 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 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The following containers were observed near the storage building door:

- Two closed 250-gallon totes contained contaminated cleaning acid awaiting sampling profile. The totes were marked “Hazardous Waste Toxic” (D001, D002, D006-D008, D010, and D018) and dated 8/12/21, and
- Four closed 55-gallon containers of alkaline debris/solids (D010). The containers were marked “Hazardous Waste Toxic” and dated 8/12/21.

Record Review

All permits and RCRA compliance documentation were available for review on-site. The inspectors reviewed hazardous waste manifests, land disposal restriction notices, waste profiles, contingency plan, trainings, waste analysis plan, waste minimization plan, biennial report, closure plan, and financial assurance.

Hazardous waste manifests, land disposal restriction notices, and waste profiles were reviewed for the past three years. The facility’s hazardous waste transporter is EQ Industrial Services (MIK435642742). The designated facility is US Ecology Tampa (FLD981932494). The facility submitted 2019 biennial report to the FDEP on 2/20/20.

During the records review, it was observed that a 2016 analysis of the facility’s used oil/fuel mixture was a hazardous waste due to characteristic of ignitability (D001). The facility records indicated that the facility disposed of the used/fuel as a non-hazardous waste. On September 9, 2021, the facility provided the EPA and FDEP a test analysis of used oil/fuel mixture which indicated used oil/fuel mixture is non-hazardous. The EPA and FDEP informed the facility that a waste determination will be needed for each batch of used oil/fuel mixture sent off for energy recovery. The facility must keep respective used oil/fuel shipping records, waste determination and other supporting documents for at least three years for the inspector review.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 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 articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

The contingency plan contains the emergency coordinator, emergency contacts, emergency response strategy and reporting, spill control actions, spill control equipment, facility map including locations of hazardous waste and SAAs and discharge notification procedures. The proof of emergency response arrangements with the local authorities were available for review. The hazardous waste container inspections are conducted weekly and include all required elements including date, time of inspection, who inspected the containers, number of containers, and condition of containers. Last container inspection was on 8/20/21.

The record review indicated that all employees receive initial and annual hazardous waste and used oil training, including training concerning the facility’s proper hazardous waste and used oil handling, storage, and spill cleanup procedures. Training includes DOT Hazmat, RCRA Hazardous Waste Management, and RCRA Waste Analysis Plan. The last employee training was conducted in August 2021.

10) **Closing Conference**

A closing conference was conducted at the conclusion of the inspection. Mr. Tyler DeGraff participated in the closing conference. The observations made during the inspection were discussed and the inspection was concluded. Pratt & Whitney was inspected as a large quantity generator of hazardous waste. Corrective actions were completed prior to the issuance of this report.

11) **Signed**

PARVEZ
MALLICK

Digitally signed by
PARVEZ MALLICK
Date: 2021.10.26
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Parvez Mallick
Inspector and Author of Report

Date

12) **Concurrence and Approval**

ARACELI
CHAVEZ

Digitally signed by ARACELI
CHAVEZ
Date: 2021.10.27 15:13:12
-04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Compliance Evaluation Inspection photos taken by Parvez Mallick, EPA
(Canon PowerShot SD980 IS - EPA Property Number S75319)



Photo #1 - container not marked with an indication of the hazards of the contents.

HAZARDOUS WASTE	
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL	
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE US ENVIRONMENTAL PROTECTION AGENCY	
DOT Information	
Proper Shipping Name: Waste Aerosols, Flammable (2001, 2002)	
Hazard Class: 2.1	UN/NAF: UN1950
General Information	
Company Name: Pratt & Whitney	City/State/Zip: Jupiter, FL 33458
Address: 17900 Beehive Highway,	EPA ID No.: FLD001447952
Manifest Tracking No.:	Vendor Profile:
Manifest Line No.:	
Container Information	
Generic Desc: Aerosol Spray Cans, Ignitable, Reactive	Waste Stream ID: 002
Department: Pratt & Whitney Global	EPA State Code: 0001, 0003
Waste Location: G88-001, Scrap Yard Drum Storage Area	Issue Date: 08/31/2021
Specific Waste Desc: Tank Container	Full/Approx. Vol. (L): 08/31/2021
2021	1082756
UN1950	
HANDLE WITH CARE CONTAINS HAZARDOUS OR TOXIC WASTES	
1082756	
Aerosol Spray Cans- Ignitable, Reactive	

Photo #1a – Facility's new label showing hazards of the contents.



Photo #2 - container not marked with an indication of the hazards of the contents.

HAZARDOUS WASTE	
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL	
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE US ENVIRONMENTAL PROTECTION AGENCY	
DOT Information	
Proper Shipping Name: Waste Aerosols, Flammable (2001, 2002)	
Hazard Class: 2.1	UN/NAF: UN1950
General Information	
Company Name: Pratt & Whitney	City/State/Zip: Jupiter, FL 33458
Address: 17900 Beehive Highway,	EPA ID No.: FLD001447952
Manifest Tracking No.:	Vendor Profile:
Manifest Line No.:	
Container Information	
Generic Desc: Aerosol Spray Cans, Ignitable, Reactive	Waste Stream ID: 002
Department: Pratt & Whitney Global	EPA State Code: 0001, 0003
Waste Location: G88-001, Scrap Yard Drum Storage Area	Issue Date: 08/31/2021
Specific Waste Desc: Tank Container	Full/Approx. Vol. (L): 08/31/2021
2021	1082756
UN1950	
HANDLE WITH CARE CONTAINS HAZARDOUS OR TOXIC WASTES	
1082756	
Aerosol Spray Cans- Ignitable, Reactive	

Photo #2a – Facility's new label showing hazards of the contents.