

EPA Region 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	09/07/2022 10:35 AM (PT)	Announced: No
Inspection Exit Date/Time	09/07/2022 01:15 PM (PT)	Access: Granted
Weather	Sunny, dry, 80s	
Regulatory Program	RCRA	
Type of Inspection	CEI - Compliance Evaluation Inspection	
Company Name	Collins Aerospace	
Facility or Site Name	Goodrich Corporation Carbon Products	
Facility/Site Identifier	WAH000006940	
Facility/Site Physical Address	11135 W Westbow Blvd	
City, State, Zip Code	Spokane, WA 99224	
County/Borough	Spokane	
Generator Status	LQG	
NAICS	336413 - Other Aircraft Parts and Auxiliary Equipment Manufacturing	
Type of Operation	Carbon manufacturing brake disks	
Size of Facility	27 acres manufacturing, plus 140,000 sq ft support areas	
Length of Facility at Location	Since 1998	
Geographic Coordinates	47.583604, -117.568511	
Permit Number (If Applicable)	Not Applicable	

Lead Inspector:

Katie Bradshaw	KATRINA BRADSHAW Digitally signed by KATRINA BRADSHAW Date: 2022.09.23 09:30:16 -07'00'		
	EPA Region 10	bradshaw.katrina@epa.gov	(206) 553-6318

Peer Review:

Matt Quarterman	MATTHEW QUARTERMAN Digitally signed by MATTHEW QUARTERMAN Date: 2022.09.23 09:47:43 -07'00'		
	EPA Region 10		

Supervisor Review:

Jen Sullivan	Jennifer A Sullivan Digitally signed by Jennifer A Sullivan Date: 2022.09.23 10:05:04 -07'00'		
	EPA Region 10	Sullivan.Jennifer.A@epa.gov	(206) 553-6978

Inspection Date: 09/07/2022**SECTION I – INTRODUCTION****Site Entry and Purpose of the Inspection**

Type of inspection: CEI - Compliance Evaluation Inspection

EPA Region 10 Lead Inspector, Katie Bradshaw, arrived at the Goodrich Corporation Carbon Products Facility (the “Site” or “Facility”), located at 11135 W Westbow Blvd, Spokane, WA 99224, at 10:35 AM (PT) on 09/07/2022 for an unannounced RCRA inspection. EPA Region 10 Lead Inspector presented credentials to and informed Craig Meredith, Safety Manager, that this was an EPA Region 10 inspection to determine compliance with the Resource Conservation and Recovery Act (RCRA). This inspection was conducted pursuant to Washington’s federally authorized RCRA regulations found at Washington Administrative Code (WAC) 173-303. The facility was inspected to ensure compliance with standards for hazardous waste generators, universal waste management, and used oil management. The inspection was conducted as part of a Core Program requirement for FY 2022.

This report is based on information supplied by Goodrich Corporation Carbon Products Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility and its Headquarters, but not limited to: direct observations made by the EPA Region 10 inspector, photographs taken by EPA Region 10 inspector, physical evidence collected by the EPA Region 10 inspector, measurements or samples taken by EPA Region 10 inspector, verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector by the facility representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector	Katie Bradshaw	(206) 553-6318	bradshaw.katrina@epa.gov	Yes	Yes
Safety Manager	Craig Meredith		Craig.Meredith@collins.com	Yes	Yes
Environmental Compliance Manager	Chris Matuszak	(509) 744-6038	Chris.Matuszak@collins.com	Yes	Yes

Opening Conference

I, EPA Lead Inspector Katie Bradshaw arrived at the Goodrich Corporation Carbon Products at 10:35 AM (PT) on 09/07/2022 for an inspection. I presented my credentials to and informed Craig Meredith that this was an EPA RCRA inspection. The table above presents all the inspection participants in opening and closing conferences.

During the inspection I looked at the facility’s processes, in addition to hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that facility representatives had not yet identified or designated as hazardous. Specifically, I inspected the following areas of the facility listed below:

Only those areas in which I observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Facility/Site Information

What type of generator facility verified as?	Large Quantity Generator, verified by Chris Matuszak, along with observations during inspection, and review of manifests
What type of generator facility notified?	LQG
Safety Training Provided to Inspector(s)?	Yes
Operating Hours	24 hours a day, 365 days a year
Weather Conditions	Sunny, warm, dry
Number of employees	223

Process Description

Carbon manufacturing of brake disks is accomplished by the following processes:

- Textile processing
- Single Step Carbonization (SSC)
- Chemical Vapor Deposition (CVD)
- Feature Machining
- Finishing

Building(s)

Building/Area/Sub-area	Process Description	Area Of Concern
Admin		No
Furnace Deck		No
Main Level 1,2,3		Yes
Basement Phase 1,2,3		No
Machine Shop		No
Finishing		No
SAA		Yes
Main Level Haz Waste Cage		No
SSC	single step carbonization	No
Basement	90-day area, three oil tanks transfer to a single storage tank, satellite accumulation areas	Yes
Textile		No

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SECTION II – OBSERVATIONS

Building: SSC/Basement			
Observation #: KB1-OB-003	Date: 09/07/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed:		Title:	
While inspecting the single step carbonization process in the basement, I observed four 55-gallon drum container, each labeled as hazardous waste. All four containers were closed and had accumulation start dates and hazard indicators. Two of the containers in this area had labels listing the waste as D003 reactive waste but had toxic hazard indicators. One container was labeled as, "SSC Carbon Tar PPE, Rags, Absorbent, & Ammonia," the other was labeled "SSC Acid Filters."			
Photo(s) 1. IMG-202209071129432943190550.jpg 2. IMG-202209071130193019158098.jpg 3. IMG-202209071130323032179667.jpg			

Building: Furnace Deck/SAA			
Observation #: KB1-OB-004	Date: 09/07/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed:		Title:	
While inspecting the satellite accumulation area on the furnace deck, I observed two 55-gallon drum containers. Both were closed and labeled as hazardous waste. On each label were D003 reactive waste codes. The hazard indicators listed health hazard and environmental hazard. One container was labeled as, "FD Lid Scrapings," the other was labeled as, "FD Vertical Heat Exchanger Cleanout Condensers, Demister Pads."			
Photo(s) 1. IMG-202209071137213721168984.jpg 2. IMG-202209071137293729175814.jpg			

Building: Machine Shop/SAA			
Observation #: KB1-OB-005	Date: 09/07/2022	Contains AOC: Yes	Contains CBI: No
Person Interviewed:		Title:	
While also inspecting the Machine Shop, I observed one 55-gallon drum container. The container had a funnel lid that was open. I was told this container was used oil. During the inspection a facility representative closed the funnel and attached a label to the container with the words "Used Oil."			
Photo(s) 1. IMG-20220907120454454189177.jpg 2. IMG-2022090712050858202209.jpg 3. IMG-20220907120536536160128.jpg			

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SECTION III – RECORDS REVIEW

Record: Manifests		AOC: No
Ref #: KB1-RR-001	Reviewed By: Katie Bradshaw	Reviewed Date: 09/07/2022
I reviewed all manifests from calendar years 2021 and 2022.		
Record: Inspections		AOC: No
Ref #: KB1-RR-002	Reviewed By: Katie Bradshaw	Reviewed Date: 09/07/2022
I reviewed weekly central accumulation area inspections for calendar year 2022. This facility conducts inspections of each central accumulation twice weekly.		
Record: Personnel Training		AOC: No
Ref #: KB1-RR-003	Reviewed By: Katie Bradshaw	Reviewed Date: 09/22/2022
I reviewed the training records for the following employees: Craig Meredith (2021) and Chris Matuszak (2022).		

SECTION IV – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Building: Machine Shop	Area: SAA	Sub-area:
KB1-OB-005		
One container of used oil not closed, not labeled as "Used Oil."	Citations: WAC 173-303	
Building: SSC	Area: Basement	Sub-area:
KB1-OB-003		
Waste codes were for D018 and D003. Hazard indicators were for health hazard and environmental hazard.	Citations: WAC 173-303	
Building: Furnace Deck	Area: Main Level	Sub-area: SAA
KB1-OB-004		
Waste codes indicated reactive waste; hazard indicators were for toxic waste.	Citations: WAC 173-303	

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One additional area of concern is the hazardous waste tank in the basement level of the SSC area. This tank designates as Extremely Hazardous Waste and receives oil from the three oil tanks which are part of the oil-water separator process. I asked Chris Matuszak if the tank was subject to Subpart CC requirements, and he replied that he was not sure.

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

During the closing conference, I reviewed the areas of concern cited above with Chris Matuszak and Craig Meredith. I requested the following:

- Documentation of the corrected hazard indicator labels
- A copy of the contingency plan
- The waste profiles for the Waste Scrubber Oil
- Most recent analytical results for the Waste Scrubber Oil
- Waste profile for the Contaminated Rags
- Waste Profile for the SSC Waste Liquids

I explained that I was not making a compliance determination on site, and that any follow up would likely come from a compliance officer once I finished the report. I thanked them for their time and cooperation and departed the facility at 1:15 PM.

Follow Up

I observed Chris Matuszak close the funnel and label the used oil container in the Machine Shop SAA.

Communication Log

I received an email from Chris Matuszak with the following records:

- Contingency Plan
- Waste Profiles of the Scrubber Oil and mis-labeled containers
- Waste Scrubber Oil Analytical Results
- Photographs of Updated Waste Labels with Hazard Indicators

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VII – LIST OF APPENDICES

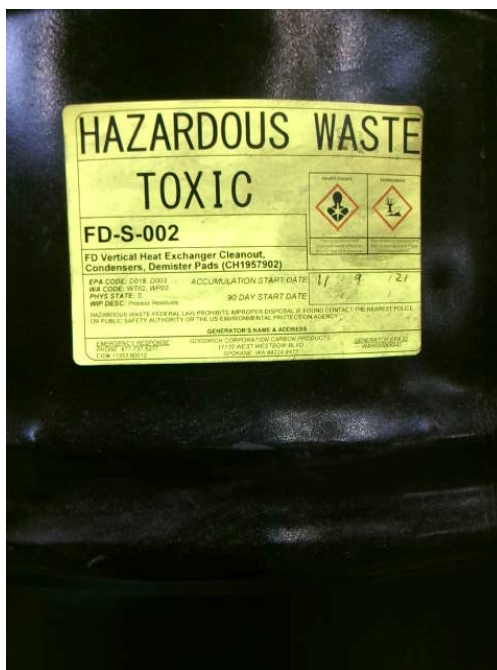
1. Photo Log

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APPENDIX 1: PHOTO LOG



Label with "Toxic" indicator and D003 code	IMG-202209071137213721168984.jpg	
09/07/2022 11:37 AM	Photographer: Katie Bradshaw	
Furnace Deck SAA	No CBI	No PII



Label with "Toxic" indicator and D003 code	IMG-202209071137293729175814.jpg	
09/07/2022 11:37 AM	Photographer: Katie Bradshaw	
Furnace Deck SAA	No CBI	No PII

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Open funnel on used oil container; no label	IMG-20220907120454454189177.jpg	
09/07/2022 12:04 PM	Photographer: Katie Bradshaw	
Machine Shop/SAA	No CBI	No PII



Chris M. closed funnel on used oil container	IMG-2022090712050858202209.jpg	
09/07/2022 12:05 PM	Photographer: Katie Bradshaw	
Machine Shop/SAA	No CBI	No PII

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Chris M. placed "Used Oil" label on container	IMG-20220907120536536160128.jpg	
09/07/2022 12:05 PM	Photographer: Katie Bradshaw	
Machine Shop/SAA	No CBI	No PII



Label with "Toxic" indicator and D003 code	IMG-202209071129432943190550.jpg	
09/07/2022 11:29 AM	Photographer: Katie Bradshaw	
SSC/Basement	No CBI	No PII

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Label with "Toxic" indicator and D003 code	IMG-202209071130193019158098.jpg	
09/07/2022 11:30 AM	Photographer: Katie Bradshaw	
SSC/Basement	No CBI	No PII



Backup view of labels with "Toxic" indicator	IMG-202209071130323032179667.jpg	
09/07/2022 11:30 AM	Photographer: Katie Bradshaw	
SSC/Basement	No CBI	No PII