



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100

BOSTON, MA 02114-2023

Dated via electronic signature stamp

Matthew G. Allen
GE Aerospace
1000 Western Avenue
Lynn, MA 01910

RE: **NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act
Act of 1976 (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C.
6622(a) and 6924(d) through (m), and Massachusetts General Law, Chapter 21C,
Sections 4 and 6.

Dear Mr. Allen:

On January 23-25, 2024, representatives of the United States Environmental Protection Agency (EPA) completed a RCRA compliance evaluation inspection (CEI) of GE Aerospace EPA ID # MAD001408517. The purpose of this inspection was to determine the compliance of GE Aerospace with 310 CMR 30.000, and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-273. The State of Massachusetts has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of 310 CMR 30.000, and the corresponding federal Hazardous Waste Management Regulations found at 40 CFR Parts 260 through 272. The violations are set forth below:

- 1. Failure to obtain a license for the storage of hazardous waste for greater than 90 days, as required by 310 C.M.R. 30.341(8).**

Specifically, there was one 55-gallon container of hazardous waste, sodium hydroxide with an accumulation start date of 09/11/2023, and one 55-gallon container of hazardous waste, lead paint chips with two accumulation start dates of, 10/20/2023 and 11/12/2023, located in CAA-100. The date of the inspection was January 23-25, 2024.

- 2. Failure to separate containers holding incompatible hazardous wastes by means of a dike, berm, wall, or other device, as required by 310 C.M.R. 30.342(1)(f), which references 310 C.M.R. 30.688(4).**

Specifically, there was one 30-gallon container of hazardous waste, sulfuric acid, and three 55-gallon containers of waste sodium hydroxide staged on the same pallet in CAA-100. Sulfuric acid and sodium hydroxide are incompatible chemicals and are required to be separated by a dike, berm, wall, or other device.

3. **Failure to maintain sufficient aisle space to allow for the inspection of containers and the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment, as required by 310 CMR 30.341(1)(e)(6), which references 310 C.M.R. 524(5), and 310 C.M.R. 30.342(1)(c), which references 310 C.M.R. 30.685.**

Specifically, there was a lack of aisle space between containers which resulted in the inspection team not being able to inspect all containers and container labels in CAA-100.

4. **Failure to mark or label each container of hazardous waste with the date upon which each period of accumulation begins, as required by 310 C.M.R. 30.341(2)(d).**

Specifically, there was one 55-gallon container of hazardous waste, jet fuel, ignitable, toxic, generated in Building 29/29L1, located in CAA-100, that was not dated.

GE Aerospace must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.

Within (30) thirty calendar days of receipt of this NOTICE, submit a written description, with supporting documentation, of the actions taken to address requirements number 1 through number 4 above. Submit the information to:

Wilkinson.cheryl@epa.gov

OR

Cheryl Wilkinson, Life Scientist
U.S. Environmental Protection Agency
Waste and Chemical Compliance Section
5 Post Office Square, Suite 100
Mail code: 5-MO
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

Please direct questions to Cheryl Wilkinson, at wilkinson.cheryl@epa.gov. Thank you for your attention to this matter.

Sincerely,

O'Donnell,
Mary Jane

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O'Donnell, Mary Jane
Date: 2024.04.10
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Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

cc: Scott Fasulo, MassDEP