RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

HAECO Airframe Services, LLC
623 Radar Road
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EPA ID#: NCD986186351
NAICS#: 488119 – Other Airport Operations

3) Responsible Officials

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4) Inspection Participants

Nathan Reed, HAECO Airframe
Duane Gentry, HAECO Airframe
Dan Girdner, NCDEQ
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5) Date of Inspection

March 27, 2024

6) Applicable Regulations[1]

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; and the North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119.

Pursuant to 15A NCAC 13A .0102(b) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

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

Pursuant to 15A NCAC 13A .0119(a) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to 15A NCAC 13A .0107(a) [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 any 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 Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine HAECO Airframe Services, LLC's compliance with the applicable requirements of RCRA and the corresponding North Carolina regulations. This was an EPA lead inspection.

8) Facility Description

HAECO Airframe Services, LLC, (HAECO) specializes in the inspection, repair, and modification of large jet aircraft at 623 Radar Road, Greensboro, North Carolina (the "Facility"). Operations run twenty-four hours per day, 365 days per year, and HAECO has approximately 1,000-1,200 employees at this location. The Facility occupies approximately 34 acres adjacent to and leased from the Piedmont Triad International Airport, and it includes five hangars, a fire pump house, an annex building, a chemical storage building, and three hangar membranes. In addition to its gated access to airport perimeter roads, the HAECO facility also has gated access to the adjacent airport taxiways.

Aircraft hardware is coated with a finish that contains heavy metals, and vibration movement during aircraft operation may generate dust around the hardware that also contains these heavy metals. Regardless of the repair activity on each aircraft, HAECO employees perform cleaning activities prior to, during, and following all repairs. Wipes and personal protective equipment (PPE) used during the cleaning operations may become contaminated with heavy metals and with cleaning solvents. HAECO manages wipes, PPE, and other solid wastes

generated during the cleaning process as hazardous waste debris with the EPA Waste Codes D005, D006, D007, D008, D035, F002, F003, and F005.

The Facility also generates used aerosol cans and small containers of expired and unused product materials. Although HAECO personnel indicated that they are in the process of re-profiling used aerosol cans as universal waste, they stated that the cans are currently being managed as hazardous waste. Small containers of expired and unused product are first accumulated in 10-gallon bins before they are transferred to the Facility's main hazardous waste central accumulation area (CAA). HAECO personnel stated that the bins are transferred to the CAA about once every week. Members of the six-person environmental health and safety program, in cooperation with the waste management consultant, perform the final steps of waste profiling activities at the CAA. First, personnel identify empty containers inside the bins and prepare them for disposal. Next, they identify expired and unused products that may be suitable for secondary use as-is, and they place identified usable materials into the available on-site inventory. For example, unused acetone may be used for paint spray gun cleaning at the on-site paint booths, and unused alcohol may be added to ground services equipment gasoline tanks to absorb and remove water from the fuel. Finally, personnel identify and characterize the remaining expired and unused materials as solid or hazardous waste and prepare those wastes for disposal.

Hazardous waste is generated, accumulated, and managed using the same procedures at each of the five aircraft maintenance hangars. Specifically, HAECO divides each individual aircraft into two satellite accumulation areas (SAAs) and positions a mobile cart with one or more containers within each SAA. Each SAA may have one 55-gallon container for accumulating hazardous waste debris, one 55-gallon container for accumulating used aerosol cans and/or one 10-gallon bin for accumulating expired materials or empty containers. Typically, the mobile cart is placed at the base of the rolling set of steps positioned at the aircraft door. Although a generator may manage more than one container in the same SAA, the SAA Permit Exemption limits the total volume of hazardous waste accumulated in each SAA at any given time to be no more than 55 gallons. Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

Although the total storage capacity of containers at a mobile SAA may exceed 55-gallons, HAECO has a system in place to prevent the accumulation of excess waste within each SAA. Each 55-gallon container used to accumulate hazardous waste debris in an aircraft maintenance hangar mobile SAA is equipped with a plastic liner. Each liner is labeled with a two-letter code that identifies the HAECO customer associated with that SAA. Facility personnel explained that, at least once each day, the liners containing hazardous waste debris are removed from each 55-gallon container and replaced with a new, empty liner. The liners containing debris are taken to the container compacting area where they are compacted into 55-gallon containers.

In addition to the aircraft maintenance hangar area, Hangar #1, the main building, also houses administrative offices, support shops, supplies storage, a paint department, a ground services equipment maintenance shop, and a machine shop. Hangar #5 also houses a paint booth.

Hazardous wastes may be generated in each hangar and its associated support shops and paint department, in the equipment maintenance shop, in the machine shop, in the composite shop, or in each of the three hangar membranes, or "Nose Docks." HAECO personnel estimated that the facility manages approximately 60 SAAs, including the mobile SAAs established within the aircraft maintenance hangars. All hazardous wastes generated on-site are eventually transferred to the main hazardous waste central accumulation area (CAA), located in the chemical storage building. The Facility also consolidates hazardous waste debris using a container compactor, which is in a smaller CAA within the fire pump house. Personnel estimate that the Facility ships approximately ninety 55-gallon containers of hazardous waste off-site every six weeks.

TIMCO Aviation Services, Inc. (TIMCO), HAECO, or TIMCO d.b.a. HAECO has operated as a large quantity generator (LQG) of hazardous waste at the Facility for at least the past thirty years. HAECO most recently notified as an LQG with its 2021 Biennial Report, which was submitted on February 4, 2022. According to that biennial report, HAECO generated the following hazardous wastes during calendar year 2021:

Waste Description	EPA Waste Code(s)	Volume
Compacted Paint Debris	D005 D006 D007 D008 D035 F002 F003 F005	185,477 pounds
Oil Water Separator – Liquid	D006 D007 D008	23,000 pounds
Flammable Epoxy Bulk Pack	D001 D005 D007 D008 D035	2,603 pounds
Flammable Paint in Cans	D001 D005 D007 D035	2,420 pounds
Spent Cleaning Solvent from Parts Washers	D039	1,823 pounds
Flammable Liquid, Bulk	D001 D005 D007 D008 D035 F003	1,615 pounds
Amine Bulk Pack	D001 D002 D005 D007 D035	798 pounds
Resin Kits	D001 D002 D005 D007	718 pounds
Phosphoric Acid Filters	D002 D007 F019	482 pounds
Alodine 1201	D002 D007	400 pounds
Chrome Paint Filters	D007	250 pounds

Aerosol Cans	D001 D005 D007 D008 D035	229 pounds
Downdraft Dust	D006 D007	171 pounds
Cadmium Brush Plating – Liquids	D006 D007	156 pounds
Corrosive Liquids Lab Pack	D002	101 pounds
Phenol Dichloromethane Lab Pack	D002 D007	59 pounds
Peroxide Type E Lab Pack	D002 D007	27 pounds
Lab Pack Oxidizing Liquid	D001 D007	26 pounds
Lab Pack Acids	D002 U134	11 pounds

9) Previous Inspection History

The NCDEQ has conducted seven RCRA CEIs at the subject facility since calendar year 2008 and found no apparent violations of RCRA's requirements during those inspections. The most recent RCRA CEI was conducted on May 3, 2019.

10) Opening Conference

On March 27, 2024, EPA inspector Laurie Benton DiGaetano, accompanied by NCDEQ inspector Daniel Girdner, arrived at HAECO Airframe Services, LLC at approximately 10:35 a.m. Nathan Reed, Environmental Manager, immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Nathan Reed, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf. The EPA inspector 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.

Nathan Reed provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Nathan Reed led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Hangar #1 SAAs:

According to the Facility's Quick Reference Guide (QRG), HAECO has identified eight SAAs in Hangar #1 for managing hazardous waste that is generated inside the hangar. When performing maintenance activities on an aircraft, the Facility divides each individual aircraft into two satellite accumulation areas (SAAs) and positions a mobile cart with one 55-gallon container within each SAA. Each SAA may also have one 55-gallon container for accumulating waste aerosol cans and one 10-gallon bin for accumulating expired materials or empty containers. The inspectors observed two active SAAs during the CEI:

- In the first SAA, the inspectors observed one 55-gallon container (Photos 1), which was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags and PPE, and marked with an indication that the contents are ignitable and toxic. The inspectors also observed a notice on the top of the container instructing personnel on what materials may and may not be placed inside the container (Photo 2); and

- In the second SAA, the inspectors observed two 55-gallon containers and a 10-gallon plastic bin (Photo 3). One 55-gallon container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, and identified with an indication that the contents are ignitable and toxic. The other 55-gallon container was labeled spray cans. Although HAECO personnel indicated that they are in the process of re-profiling used aerosol cans as universal waste, they stated that the cans are currently being managed as hazardous waste. The 55-gallon container of used aerosol cans was not labeled with the words "hazardous waste", and it was not marked with an indication of the hazards of its contents. If HAECO intends to manage used aerosol cans as universal waste, the container should be labeled with the words "universal waste - aerosol can(s)," "waste aerosol can(s)," or "used aerosol can(s)". The 10-gallon plastic bin was labeled "waste pallet 2" and it contained one empty container.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazardous of the contents.

In addition to accumulating hazardous waste in designated mobile SAAs, the Facility also accumulates used oil in designated mobile containers inside Hangar #1. The inspectors observed three 55-gallon containers for accumulating used oil in various locations within the hangar. Each used oil container observed in this hangar was labeled with the words "used oil" and positioned on a rolling base. At least one of the three containers was equipped with a large funnel for draining used oil into the container (Photo 4).

Hangar #1 Paint Shop:

According to the Facility's QRG, HAECO has identified five SAAs in the Hangar #1 Paint Shop. The inspectors observed four of the five SAAs during the CEI. The fifth SAA is associated with a

paint gun cleaner, which recirculates solvents to clean paint guns. HAECO was in the process of relocating equipment, and the paint gun cleaner was not in the Paint Shop at the time of the CEI. Therefore, the SAA associated with that unit was not in service.

HAECO generates hazardous waste rags, PPE, and used paint booth filters in the Paint Booth area. Personnel stated that paint booth filters are changed about two-to-four times each year, and that cubic yard boxes are brought here to accumulate hazardous waste used paint booth filters when they are removed. HAECO manages a dedicated SAA at the Paint Booth for accumulating hazardous waste used rags and PPE, which are routinely generated in this area. The inspectors observed one 55-gallon container in this SAA (Photo 5). The container was labeled as D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste, and marked to indicate that the contents are ignitable and toxic.

HAECO manages another SAA at the Paint Booth for accumulating unused paints that either remain in the paint booth spray gun after use or that are prepared but not used in the paint booth spray gun. The inspectors observed one 55-gallon container in this SAA (Photo 6). The container was labeled as hazardous waste used liquid paints, and it was equipped with a latched funnel lid. Although the container was identified with a flammable liquid DOT hazard sticker, it was not marked to indicate that the contents are also toxic.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazardous of the contents.

In addition to Painting, HAECO personnel perform spot chromate and cadmium plating in the Paint Shop. The spot plating is performed inside a hooded unit where small trays can be filled with plating liquids. Plating chemicals are applied using a brush and the prepared part is then placed into the tray of plating liquid. After use, the used plating liquids are poured into one of two hazardous waste containers. The Plating Shop manages one SAA for accumulating hazardous waste liquids generated during chromate plating activities and another for accumulating hazardous waste liquids generated during cadmium plating activities. The inspectors observed one 20-gallon container in the Alodine (chromate plating) waste SAA (Photo 7), which was in the corner of the Paint Shop. The container was identified as D002, D007 hazardous waste on a torn hazardous waste label. It was also identified with a corrosive DOT hazard sticker, but it was not marked to indicate that the contents are also toxic. The inspectors observed another 20-gallon container in the cadmium plating waste SAA (Photo 8). The container was not labeled with the words hazardous waste or marked with an indication of the hazards of its contents.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazardous of the contents.

<u>Nose Dock SAAs</u>:

Although none of the hangar membranes, or "Nose Docks", were in service at the time of the CEI, the inspection participants toured two of three Nose Dock areas. According to the Facility's

QRG, each Nose Dock is equipped with one SAA for accumulating hazardous wastes generated in that area. Facility personnel stated that each area is also equipped with containers for accumulating used oil and used oil dry when the Nose Dock is in service. No hazardous waste was observed in the Nose Docks.

Composite Shop SAAs:

The Composite Shop is a specialty area for performing maintenance activities on parts made from a layered phenolic carbon fiber glass epoxy composite material. The Composite Shop also houses a mixing area; a bead blast area; a clean room; a paint booth; and a former anodizing line area. According to the Facility's QRG, HAECO has identified a total of six SAAs in the Composite Shop.

The inspectors observed one 55-gallon container in the first SAA (Photo 9), which is used to accumulate hazardous waste debris, PPE, brushes, and rags. The container was closed; it was labeled with the words "hazardous waste", and it was marked with an indication that the contents are ignitable and toxic.

HAECO accumulates universal waste next to the second SAA. The inspectors observed two 5-gallon containers for accumulating universal waste batteries in this area (Photo 10). One 5-gallon container was labeled "universal waste alkaline (used) batteries", and the other was labeled "universal waste non-alkaline batteries, lithium only". Although neither universal waste container was marked with an accumulation start date, HAECO personnel stated that the 5-gallon containers are emptied into larger 55-gallon containers approximately once per month, and that the 55-gallon containers are marked with an accumulation start date. The Facility also had records of two shipments of universal waste sent off-site during calendar year 2022 and two more during calendar year 2023.

The inspectors observed one 10-gallon bin for accumulating small empty containers and small containers of unused or expired products in the second SAA (Photo 10). The bin was labeled "expired products to be sorted" and it contained a number of smaller empty and non-empty containers. The 10-gallon bin has the potential to be holding hazardous waste that is generated in the Composite Shop, but it was not closed or labeled with the words "hazardous waste" or with an indication of the hazards of its contents. Although HAECO's standard operating procedures call for environmental personnel to make the final hazardous waste determination on the contents of these small containers at the CAA, hazardous waste management requirements begin at the point of generation.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106(a) [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 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11]. A small or large quantity generator must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste.

The third SAA is located next to the mixing area, and the inspectors observed one 55-gallon container in this SAA. The container was labeled with the words "hazardous waste", and it was marked with an indication that the contents are ignitable and toxic. Nathan Reed immediately latched the container lid, which was open upon arrival.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Composite Shop employees may use the available Bead Blast Unit to clean parts, if necessary. Spent bead blast media is accumulated in the fourth SAA. The inspectors observed one 55-gallon drum in the bead blast SAA (Photo 11). The drum was labeled as hazardous waste and marked with an indication that the contents are toxic.

Preimpregnated materials are cut to size inside the Clean Room section of the Composite Shop. The excess or trimmed materials are accumulated as hazardous waste in the Clean Room SAA. The inspectors observed one 55-gallon container in this SAA. The container was labeled with the words "hazardous waste", and it was marked with an indication that the contents are ignitable and toxic.

The final SAA in the Composite Shop is located at the Paint Booth. Waste paints and cleaning solvents generated when cleaning paint spray guns are accumulated as hazardous waste liquids in this SAA. The inspectors observed one 55-gallon drum in this SAA (Photo 12). The drum was equipped with a funnel, it was labeled as hazardous waste liquid paint waste, and it was marked with an indication that the contents are toxic and flammable.

In the past, HAECO operated an anodizing line to chemically etch surfaces so that they would accept paint coatings. The inspection participants verified that the old anodizing line is no longer in operation and that all its associated equipment has been removed from this area.

Hangar #5 Heat Treat Shop SAAs:

HAECO generates D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste paint debris and accumulates it as GSO Primer waste in a SAA at the Heat Treat Shop. The inspectors observed one 55-gallon container in this SAA (Photo 13). The container was labeled with the words "hazardous waste", and it was marked with an indication that the contents are ignitable and toxic.

Hangar #5 Machine Shop SAAs:

Various types of scrap metal shavings and cutting fluids are generated in the Machine Shop. HAECO has separated shavings containing beryllium copper from other metal shavings, and personnel stated that they are searching for a suitable place to recycle this material. All other metal shavings have been identified as aluminum scrap and will be sent for scrap metal recycling.

HAECO has identified one hazardous waste stream generated in this area. The waste is accumulated in a designated SAA, and the inspectors observed one 55-gallon drum in the SAA. The drum was labeled "hazardous waste", and it was marked with an indication that the contents are ignitable and toxic. Water-based used coolant and cutting fluids have been identified as nonhazardous liquids and they are accumulated as nonhazardous waste. The inspectors observed one 55-gallon drum of nonhazardous waste used coolant and cutting fluids in the Machine Shop.

Ground Services Equipment (GSE) Shop SAAs:

HAECO performs general vehicle maintenance activities at the GSE Shop, and the inspectors observed two SAAs in this area. One 55-gallon container was observed in the first SAA, which is used to accumulate used wipes or gloves as hazardous waste debris. The container was labeled with the words "hazardous waste", and it was marked with an indication that the contents are ignitable and toxic. Another 55-gallon container and a 10-gallon bin were observed in the second SAA (Photo 14). This 55-gallon container was labeled "non-hazardous aerosol cans for recycle" and the bin was labeled "expired products to be sorted". Although HAECO personnel indicated that they are in the process of re-profiling used aerosol cans as universal waste, they stated that the cans are currently being managed as hazardous waste. The 55-gallon container of used aerosol cans was not labeled with the words "hazardous waste", and it was not marked with an indication of the hazards of its contents. HAECO personnel added the word "used" to the label, so that it read "non-hazardous used aerosol cans for recycle".

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazardous of the contents.

The bin was labeled "expired products to be sorted" and contained two containers of expired products. The 10-gallon bin has the potential to be holding hazardous waste that is generated in the GSE Shop, but it was not closed or labeled with the words "hazardous waste" or with an indication of the hazards of its contents. Although HAECO's standard operating procedures call for environmental personnel to make the final hazardous waste determination on the contents of these small containers at the CAA, hazardous waste management requirements begin at the point of generation.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106(a) [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 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11]. A small or large quantity generator must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste.

The GSE Shop also generates used oil and used antifreeze. Among the equipment and containers staged under the shelving unit near the door, the inspectors observed one 55-gallon container of used oil, one 55-gallon container of used oil filters, and one 55-gallon container of

used antifreeze (Photo 15). Housekeeping may need attention in this area, as evidenced by stains observed on the wall, containers, and equipment. One the shelf above the containers, the inspectors observed one red tank of used oil (Photo 16). The inspectors observed a used oil filter draining through a funnel and into the 55-gallon container of used oil. The red tank was labeled with the words "used oil", but the container of used oil was not labeled.

Pursuant to 15A NCAC 13A .0118(c) [40 C.F.R. 279.22(c)] containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Hangar #4 SAAs:

Hangar #4 may accommodate up to eight aircraft, HAECO has identified fifteen SAAs in Hangar #4 on the QRG's Quick Response Map. When performing maintenance activities on an aircraft, the Facility divides each individual aircraft into two satellite accumulation areas (SAAs) and positions a mobile cart with one 55-gallon container within each SAA. Each SAA may also have one 55-gallon container for accumulating waste aerosol cans and one 10-gallon bin for accumulating expired materials or empty containers. The inspectors observed five active mobile SAAs in this hangar during the CEI:

- In the first SAA, the inspectors observed two 55-gallon containers. One 55-gallon container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, but it was not marked with an indication of the hazards of its contents (Photo 17). Nathan Reed immediately latched the container lid, which was open upon arrival. The second 55-gallon container was labeled spray cans;

- In the second SAA, the inspectors observed two 55-gallon containers. One 55-gallon container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, and identified with an indication that the contents are ignitable and toxic. The second 55-gallon container was labeled spray cans. Nathan Reed immediately latched the container lid, which was open upon arrival;

- In the third, SAA, the inspectors observed one 55-gallon container on wheels. The container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, and identified with an indication that the contents are ignitable and toxic. Nathan Reed immediately latched the container lid, which was open upon arrival;

- In the fourth SAA, the inspectors observed two 55-gallon containers. One 55-gallon container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, but it was not marked with an indication of the hazards of its contents. Nathan Reed immediately latched the container lid, which was open upon arrival. The second 55-gallon container was labeled spray cans; and

- In the fifth SAA, the inspectors observed two 55-gallon containers. One 55-gallon container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, and identified with an indication that the contents

are ignitable and toxic. Nathan Reed immediately latched the container lid, which was open upon arrival. The second 55-gallon container was labeled spray cans.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Although HAECO personnel indicated that they are in the process of re-profiling used aerosol cans as universal waste, they stated that the cans are currently being managed as hazardous waste. The 55-gallon containers of used aerosol cans were not labeled with the words "hazardous waste" and were not marked with an indication of the hazards of the contents. If HAECO intends to manage used aerosol cans as universal waste, the containers should be labeled with the words "universal waste - aerosol can(s)," "waste aerosol can(s)," or "used aerosol can(s)".

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazardous of the contents.

In addition to accumulating hazardous waste in designated mobile SAAs, the Facility also accumulates used oil in designated mobile containers inside Hangar #4. The inspectors observed one 55-gallon container for accumulating used oil. The container was labeled with the words "used oil" and positioned on a rolling base.

Hangar #3 SAAs:

Hangar #3 typically accommodates two aircraft, and HAECO has identified five SAAs in Hangar #3 on the QRG's Quick Response Map. When performing maintenance activities on an aircraft, the Facility divides each individual aircraft into two satellite accumulation areas (SAAs) and positions a mobile cart with one 55-gallon container within each SAA. Each SAA may also have one 55-gallon container for accumulating waste aerosol cans and one 10-gallon bin for accumulating expired materials or empty containers. The inspectors observed one active mobile SAA in this hangar during the CEI:

- In this SAA, the inspectors observed two 55-gallon containers. One 55-gallon container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, and it was marked with an indication that the contents are ignitable and toxic. The other 55-gallon container was labeled spray cans.

Although HAECO personnel indicated that they are in the process of re-profiling used aerosol cans as universal waste, they stated that the cans are currently being managed as hazardous waste. The 55-gallon container of used aerosol cans was not labeled with the words "hazardous waste", and it was not marked with an indication of the hazards of its contents. If HAECO intends to manage used aerosol cans as universal waste, the container should be labeled with the words "universal waste - aerosol can(s)," "waste aerosol can(s)," or "used aerosol can(s)".

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazardous of the contents.

Hangar #2 SAAs:

HAECO identified five SAAs in Hangar #2 on the QRG's Quick Response Map. When performing maintenance activities on an aircraft, the Facility divides each individual aircraft into two satellite accumulation areas (SAAs) and positions a mobile cart with one 55-gallon container within each SAA. Each SAA may also have one 55-gallon container for accumulating used aerosol cans and one 10-gallon bin for accumulating expired materials or empty containers. Personnel stated that four SAAs are inside the main hangar area and the fifth is in the back shop associated with this hangar.

Fire Pump House Compactor / CAA:

Each 55-gallon container used to accumulate D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris at the Facility is equipped with a plastic liner. Each liner is labeled with a two-letter code that identifies the HAECO customer associated with that SAA, or with a code to indicate that it is Facility waste not associated with a specific customer. Facility personnel explained that, at least once each day, the liners containing hazardous waste debris are removed from each 55-gallon container and replaced with a new, empty liner. The liners containing debris are taken to the Fire Pump House Compactor Area where they are compacted into 55-gallon containers. This area is also managed as a hazardous waste CAA.

The inspectors observed two 55-gallon container compactor units (Photo 18). HAECO personnel stated that the newer, blue unit, is the primary unit used to compact hazardous waste debris into the 55-gallon containers, but that the older, yellow unit may be used if the newer unit is down for maintenance. The inspectors observed a "no smoking" sign posted on the door leading into the Fire Pump House Building, and an emergency shower and eyewash station and fire extinguishers inside the building. Personnel working the in the CAA carry cellular phones that are supplied by HAECO and may be used to summon emergency assistance from local police departments, fire departments, or state or local emergency response teams.

The inspectors observed a row of six 55-gallon containers for consolidated hazardous waste debris located next to several empty 55-gallon containers, which were stacked two high (Photo 19). The inspectors observed two additional 55-gallon containers staged closer to the Fire Pump House Building door. Personnel stated that these two containers are full and ready for transfer to the main CAA. Each hazardous waste container was closed, labeled with the words "hazardous waste", marked with an accumulation start date, and identified with a two-letter customer identification code. The oldest container was dated March 19, 2024. Each container was labeled with a DOT class 9 hazard sticker, but none were marked with an indication of the hazards of its contents.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents.

Chemical Storage Building / Main CAA:

HAECO's main hazardous waste CAA is in the Chemical Storage Building. The building is divided designed with three storage sections that run length-wise through the building (Photo 20). Each section is equipped with conveyance rollers for ease of container movement across the section from side to side. The conveyance rollers are large enough to accommodate two 55-gallon containers and are separated with a metal walkway that provide aisle spacing. The building is also equipped with storage shelving along a portion of the outer wall on the left (Photo 21). Duane Gentry, Environmental Compliance Technician, joined the inspection participants during the tour of the main CAA.

The inspectors observed signs which read "hazardous waste storage" and "no smoking" on the door leading into the Chemical Storage Building. Personnel working the in the CAA carry cellular phones that are supplied by HAECO and may be used to summon emergency assistance from local police departments, fire departments, or state or local emergency response teams. The CAA is located within an explosion proof building that is equipped with automatic sprinklers, and an internal and external alarm system. The inspectors also observed portable fire extinguishers, spill control equipment, and decontamination equipment within the CAA.

Upon entering the Chemical Storage Building, the inspectors observed containers of universal waste fluorescent lamps, used speedy dry and used oil and a locked, caged area for storing a container of discharged oxygen generators. The inspectors observed seven boxes of four-foot universal waste lamps, one box of six-foot universal waste lamps, and three boxes of eight-foot universal waste lamps. Each box was closed, labeled, and marked with an accumulation start date. The oldest box was dated July 24, 2023. The inspectors also observed one 55-gallon container of nonhazardous used speedy dry and one 55-gallon container of used oil in this area. HAECO personnel stated that the discharging oxygen generators renders them inert, and that the discharged generators are accumulated in the 55-gallon container within the locked caged area until they are sent off-site for metals recycling.

HAECO personnel explained that the storage shelving system along a portion of the left outer wall (Photo 21) is used to presort containers that will be placed into lab packs for shipping offsite.

At the start of the first of three storage sections that run lengthwise through the building, the inspectors observed six 55-gallon containers. Four of these containers are used for bulking the contents of small containers of expired or unused materials that are accumulated in the 10-gallon bins located at SAAs throughout the facility and brought to this location. These containers were labeled for bulking acetone, alcohol, nonhazardous cleaning liquid, and D001, D005, D007, D035 hazardous waste paint thinner solvent, respectively. The fifth 55-gallon container held ammonium nitrate fertilizer that cannot be used on-site, and the sixth was a full container that had been used to bulk hazardous waste paint thinner solvent. The 55-gallon

containers of hazardous waste paint thinner solvent were each labeled with the words "hazardous waste" and identified with a DOT flammable liquid hazard sticker, but they were not marked with an indication that the contents are also toxic. The full drum was marked with an accumulation start date of February 15, 2024, and the active drum was marked with an accumulation start date of January 17, 2024 (Photo 22). Although personnel were not actively performing bulking activities at the time of the CEI, the small bung on the 55-gallon container currently being used when bulking additional hazardous waste paint thinner solvent was not closed, and hazardous waste liquid was observed on the top of the 55-gallon container rather than inside the container (Photo 23).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the words "hazardous waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)], which is a condition of the LQG Permit Exemption, hazardous waste must be placed in containers.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Much of the remainder of the first storage section was filled with the 10-gallon bins holding empty containers and containers of expired and unused materials that need to be sorted. The first storage section contained at least five double rows containing up to five bins of materials, along with other boxes and containers that had been left behind at the end of a recent customer contract. Additional bins were also observed stacked along the outer wall near this area. Although the materials in these containers have the potential to hazardous waste, the containers were not marked with the date upon which each period of accumulation begins or labeled with the words "hazardous waste;" the bins and some containers were not marked with an indication of the hazards of its contents; and several bins were not closed.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106(a) [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 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11]. A small or large quantity generator must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste.

At the end of the first storage section, the inspectors observed three cubic yard supersacks containing electronic waste.

HAECO manages a SAA within the CAA for accumulating wipes, PPE, and other solid wastes generated during the sorting and bulking process as hazardous waste debris with the EPA Waste Codes D005, D006, D007, D008, D035, F002, F003, and F005. The inspectors observed one 55-gallon drum in this SAA.

The items observed in the second storage section included five rows of empty 55-gallon containers near the back wall, a supersack of hazardous waste solids, and a number of containers of universal waste. The supersack was labeled as hazardous waste solid contaminated paint filters, marked with an accumulation start date of March 26, 2024, and identified with a DOT class 9 hazard sticker (Photo 24). It was not marked with an indication that the contents of the container are toxic.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents clearly visible for inspection on each container.

The inspectors observed a variety of containers accumulating various universal wastes in this storage section. The containers ranged in size between approximately five to fifty-five gallons. Each container was closed and labeled as universal waste. The universal waste labels identified containers for accumulating batteries, lithium batteries, u-shaped lamps, flood lamps, ballast, compact fluorescent lamps, broken fluorescent lamps, lead acid batteries, and drycell batteries.

In the third storage section, the inspectors observed a total of approximately sixty 55-gallon containers of hazardous waste solids (Photo 25). Each container was labeled D001, D006, D007, D035, F003, F005 hazardous waste flammable solids (acetone, xylene), and marked with an accumulation start date. The oldest container was dated February 9, 2024. Although the containers were each identified with a DOT class 9 hazard sticker, none were marked with an indication that the contents are toxic.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents clearly visible for inspection on each container.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan and Emergency Procedures manual, which was last updated on December 19, 2023. The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility; it includes a list of emergency equipment (fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment) and the location of the equipment within the facility; it lists the names and emergency telephone numbers for the emergency coordinator and two alternate emergency coordinators; and it includes an evacuation plan, which describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes, for personnel.

The plan also describes arrangements agreed to with the Piedmont Triad International Airport (PTIA) Fire Department, the City of Greensboro Fire Department, the HAECO Airframe Services Greensboro Emergency Response Team, the HAECO Security Team, the PTIA Police

Department, the Guilford County Emergency Medical Service, and an emergency spill response contractor. A copy of the Contingency Plan and Emergency Procedures manual (and its quick reference guide) was submitted to the PTIA Police and Fire Departments and to the Guilford County Local Emergency Planning Committee on January 12, 2024.

The quick reference guide includes a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s), but it does not include a complete list of the names of all hazardous waste and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; or a street map of the facility in relation to surrounding businesses, schools and residential areas.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, the quick reference guide must include (1) the types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time; (2) the estimated maximum amount of each hazardous waste that may be present at any one time; (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; and (5) a street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers.

Training Records:

The inspectors reviewed records of employee hazardous waste training for the Environmental Manager, two Environmental Compliance Technicians, and the Chemical Management Team. Employees filling these positions completed hazardous waste training in calendar years 2021, 2022 and 2023.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since calendar year 2022. Hazardous waste manifest records show that HAECO typically initiates at least one shipment of hazardous waste every month. The vast majority of hazardous waste sent off-site is hazardous waste debris, which is currently being sent to Tradebe Treatment (IND00646943) as D001, D006, D007, D035, F003, F005 waste flammable solids (acetone, xylene).

Weekly Inspection Records:

HAECO personnel explained that inspections are conducted in all manufacturing areas, and initially recorded on a mobile device. The same basic checklist is used in all inspected areas, and the inspector signs and dates a printed copy of the observations to create a written record for

the file. The manufacturing areas that are included during the weekly inspections are: Hangar #1, the GSE Shop, the Machine Shop, the Paint Shop, the Hangar #1 Stores, Hangar #1 NDT Area, Hangar #1 Nose Dock Area, the Composite Shop, Hangar #4, the Customer Materials area, the Tooling area, Hangar #5, Hangar #5 Tooling area, Hangar #5 Nose Dock Area, Hangar #5 Composite Services area, and the Fuel Farm.

The inspectors reviewed HAECO's available records of inspections of the hazardous waste CAAs since August 2022. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about leaking containers, closed containers, container labels, container dates, the age of the oldest container, evidence of spills outside the container, aisle spacing, emergency equipment, and the age of universal waste containers.

The inspectors did not observe records of weekly inspections for the CAA located at the Fire Pump House.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, at least weekly, the LQG must inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

13) Closing Conference

The inspectors conducted the exit meeting at approximately 5:30 p.m. with Nathan Reed and Duane Gentry. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Nathan Reed emailed a copy of the current Contingency Plan and Quick Reference Guide to the inspectors during the closing conference.

14) Summary of Observations

During the inspection, observations were made concerning the following RCRA requirements:

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106(a) [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 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11]. A small or large quantity generator must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazardous of the contents.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)], which is a condition of the LQG Permit Exemption, hazardous waste must be placed in containers.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, at least weekly, the LQG must inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the words "hazardous waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, the quick reference guide must include (1) the types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time; (2) the estimated maximum amount of each hazardous waste that may be present at any one time; (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; and (5) a street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers.

Pursuant to 15A NCAC 13A .0118(c) [40 C.F.R. 279.22(c)] containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

15) List of Attachments

Attachment 1 – Photo Log
Attachment 2 – Quick Response Map

16) Signed

LAURIE DIGAETANO

Digitally signed by LAURIE DIGAETANO
Date: 2024.05.23 08:17:54 -04'00'

Laurie Benton DiGaetano
Environmental Engineer

17) Concurrence

ALAN NEWMAN

Digitally signed by ALAN NEWMAN
Date: 2024.05.23 09:03:36 -04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

Attachment 1 – Photo Log

25 Photos taken on: March 37, 2024
Photos taken by: Laurie Benton DiGaetano
Photos taken with: Panasonic DMC TS-5
EPA Property Tag: S09533

	**Photo 1**: One 55-gallon container in a mobile SAA at Hanger #1. The container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags and PPE, and marked with an indication that the contents are ignitable and toxic.
	**Photo 2**: Notice on top of the container shown in Photo 1 which instructs personnel on what materials may and may not be placed inside the container.
	**Photo 3**: Two 55-gallon containers and a 10-gallon plastic bin in a mobile SAA at Hanger #1.

	**Photo 4**: A mobile 55-gallon container for accumulating used oil in Hanger #1. The container was labeled used oil and equipped with a funnel.
	**Photo 5**: One 55-gallon container in a SAA for accumulating hazardous waste solids at the Hanger #1 Paint Shop. The container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags and PPE, and marked with an indication that the contents are ignitable and toxic.

	**Photo 6**: One 55-gallon container in a SAA for accumulating waste paint liquids at the Hanger #1 Paint Shop. The container was labeled hazardous waste used liquid paints, and marked with an indication that the contents are ignitable. It was not marked with an indication that the contents are also toxic.
	**Photo 7**: One 20-gallon container in a SAA for accumulating chromate plating waste at the Hanger #1 Paint Shop. The container was labeled D002, D007 hazardous waste Alodine waste, and it was identified with a DOT corrosive hazard sticker. It was not marked with an indication that the contents are also toxic.
	**Photo 8**: One 20-gallon container in a SAA for accumulating cadmium plating waste at the Hanger #1 Paint Shop. The container was not labeled or marked with an indication of the hazards of its contents.

	**Photo 9**: One 55-gallon container in a SAA for accumulating hazardous waste debris, PPE, brushes, and rags generated at the Composite Shop. The container was labeled hazardous waste, and marked with an indication that the contents are ignitable and toxic.
	**Photo 10**: Two 5-gallon containers for accumulating universal waste batteries and one 10-gallon bin for accumulating empty containers and small containers of unused or expired products generated in the Composite Shop.
	**Photo 11**: One 55-gallon container in a SAA for accumulating used bead blast material generated at the Composite Shop. The container was labeled hazardous waste, and marked with an indication that the contents are toxic.

	**Photo 12**: One 55-gallon container in a SAA for accumulating liquid paint waste generated at the Composite Shop. The container was labeled hazardous waste, and marked with an indication that the contents are ignitable and toxic.
	**Photo 13**: One 55-gallon container in a SAA for accumulating hazardous waste generated at the Heat Treat Shop. The container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste paint debris, and marked with an indication that the contents are ignitable and toxic.

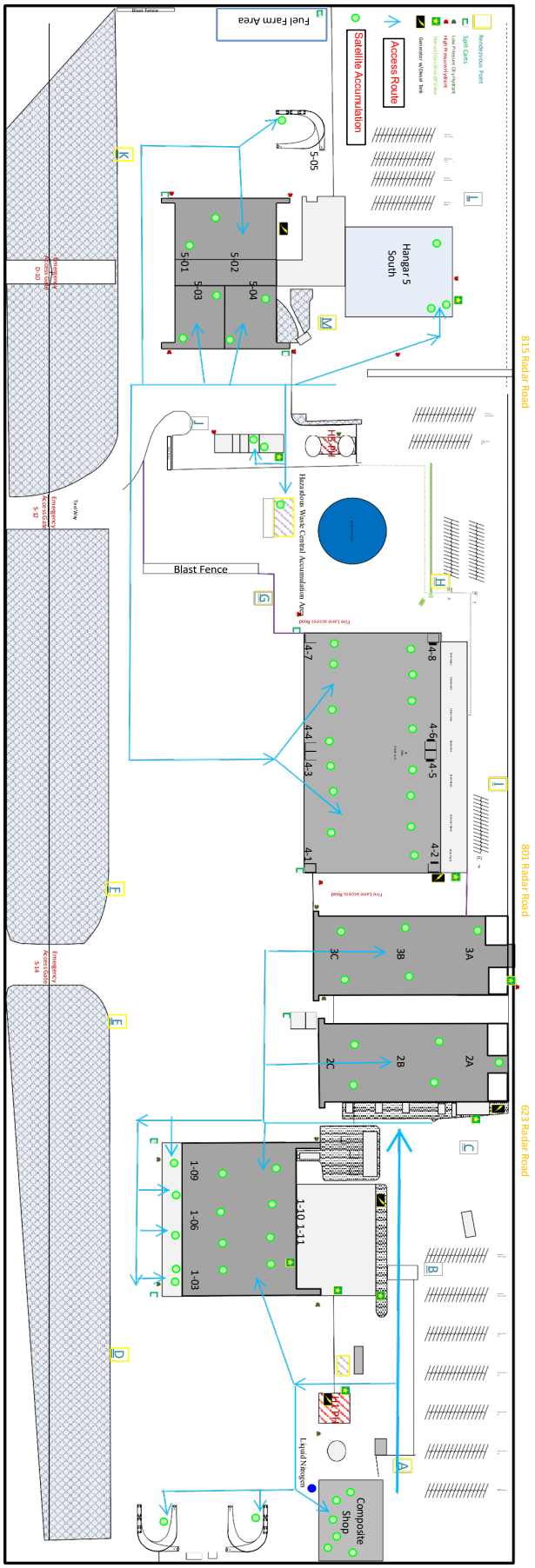
	**Photo 14**: One 55-gallon container and a 10-gallon bin in the GSE Shop's second SAA. The 55-gallon container was labeled "non-hazardous aerosol cans for recycle" and the bin was labeled "expired products to be sorted".
	**Photo 15**: One 55-gallon container of used oil, one 55-gallon container of used oil filters and one 55-gallon container of used antifreeze among other equipment in the GSE Shop. Stains on the wall, containers and equipment show evidence of poor housekeeping.
	**Photo 16**: Red used oil tank on elevated shelf in the GSE Shop.

	**Photo 17**: One 55-gallon container in a Hanger #4 mobile SAA. The container was labeled D005, D006, D007, D008, D035, F002, F003, F005 hazardous waste debris, gloves, rags, and PPE, but it was not marked with an indication of the hazards of its contents.
	**Photo 18**: Two 55-gallon compactor units located in the Fire Pump House. The newer, blue unit on the left is the primary unit used to compact hazardous waste debris into 55-gallon containers, and the older, yellow unit on the right is used when the newer unit is down for maintenance.
	**Photo 19**: Six 55-gallon containers for consolidated hazardous waste debris located next to several empty 55-gallon containers, which are stacked two high, in the Fire Pump House CAA. Each hazardous waste container was closed, labeled with the words “hazardous waste”, marked with an accumulation start date and identified with a two-letter customer identification code. Each container was labeled with a DOT class 9 hazard sticker, but none were marked with an indication of the hazards of its contents.

	**Photo 20**: The first of three storage sections in the Main CAA. Each section is equipped with conveyance rollers for ease of container movement across the section from side to side.
	**Photo 21**: Storage shelving for staging lab-pack materials along the outer wall inside the main CAA.
	**Photo 22**: Label on active 55-gallon container at the start of the first of three storage sections that run length-wise through the main CAA building. Container used to consolidate waste paint thinner solvent as hazardous waste.

	**Photo 23**: An open bung and hazardous waste liquid on the top of a hazardous waste storage container in the main CAA.
	**Photo 24**: Supersack of hazardous waste observed in the second storage section of the main CAA. The supersack was labeled as hazardous waste solid contaminated paint filters, marked with an accumulation start date of March 26, 2024, and identified with a DOT class 9 hazard sticker. It was not marked with an indication that the contents of the container are toxic.
	**Photo 25**: Approximately sixty 55-gallon containers of hazardous waste in the third storage section in the main CAA. Each container was labeled D001, D006, D007, D035, F003, F005 hazardous waste flammable solids (acetone, xylene), and marked with an accumulation start date. The oldest container was dated February 26, 2024. Although the containers were each identified with a DOT class 9 hazard sticker, none were marked with an indication that the contents are toxic.

Attachment 2 – Quick Response Map


Fuel Farm Area
Satellite Accumulation
Access Route
Rhodorvoco Point
Spill Carts
5-05
5-01
5-02
5-03
5-04
Hangar 5 South
815 Radar Road
Blast Fence
Hazardous Waste Central Accumulation Area
4-7
4-8
4-4
4-6
4-5
4-3
4-2
4-1
801 Radar Road
3C
3B
3A
2C
2B
2A
623 Radar Road
1-09
1-06
1-03
1-10
1-11
Liquid Nitrogen
Composite Shop