

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
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2) Facility Information

Goodrich Corporation Landing Systems
Services
3201 N.W. 167th Street
Miami Gardens, Florida 33056

EPA ID#: FLD982106080
NAICS #: 336411 – Aircraft Manufacturing

3) Responsible Officials

Brook Kessinger
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4) Inspection Participants

Brooke Kessinger, Collins Aerospace
Ashley Blondek, Collins Aerospace
Majid Khan, Collins Aerospace
Ivan Lopez, Collins Aerospace
Dewayne Clark, Collins Aerospace

Jade Knight, Florida Department of
Environmental Protection (FDEP)
Kaitlyn Edwardo, FDEP
Jeff Gregg, FDEP
Kayla Acosta, U.S. Environmental Protection
Agency (EPA)

5) Date of Inspection

February 05, 2025, at 10:00 A.M.

6) Applicable Regulations¹

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; Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.).

Pursuant to Fla. Admin. Code Ann. r. 62-730.020(1) [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 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 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 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] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [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 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 Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [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.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Goodrich Corporation Landing Systems Services’ (known hereinafter as “GCLSS” or “the facility”) compliance with the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection.

8) Facility Description

GCLSS was acquired by United Technologies Corporation (UTC) and merged with other UTC assets to form UTC Aerospace Systems in 2012. In 2018 UTC Aerospace Systems merged with Rockwell Collins to form Collins Aerospace. In 2020 Collins Aerospace became a subsidiary of Raytheon Technologies because of UTC merging with Raytheon Company. According to their official website, Collins Aerospace operates in the following sectors: autonomous operations, cabin experience, connected battlespace, connected ecosystem, electrified aircraft, integrated solutions, structural technologies, sustainability, and technology and innovation.

GCLSS operates a maintenance, repair, and overhaul facility for landing gear for both military and commercial aircraft. Operations performed at this facility include abrasive blasting of several types of media, disassembly, assembly, electroplating, grinding, quality control inspections, painting, and coating.

GCLSS has been operating at this location since 1990, occupies 140,000 square feet of property, and employs 116 workers. The facility has 24-hour security and has controlled access through secured perimeter fencing. The facility operates Monday through Friday.

GCLSS is registered as a LQG of hazardous waste. The facility's most recent notification of hazardous waste regulated activities was submitted on February 28, 2024, along with their 2023 biennial report. The facility generates used oil, universal waste lamps, universal waste batteries, and hazardous wastes with one or more of the following EPA waste codes:

Hazardous Waste	EPA Waste Code
Ignitable	D001
Corrosive	D002
Reactive	D003
Cadmium	D006
Chromium	D007
Lead	D008
Selenium	D010
Benzene	D018
Methyl Ethyl Ketone (MEK)	D035
Tetrachloroethylene	D039
Trichloroethylene	D040
Spent Non-halogenated Solvents (Ignitable and Toxic)	F003
Spent Non-halogenated Solvents (Ignitable)	F005
Wastewater Treatment Sludges from Electroplating Operations	F006
Spent Cyanide Plating Bath Solutions from Electroplating Operations	F007

The facility also has an Industrial Waste Pretreatment Annual Operating Permit issued by Miami-Dade County for a closed loop wastewater treatment and recycling system. There is no industrial wastewater discharge to the sanitary sewer system. The permit expires on June 30, 2025.

9) Previous Inspection History

FDEP has conducted one RCRA CEI at the subject facility between 2019 and 2025.

On July 17, 2019, FDEP conducted the most recent RCRA CEI at the subject facility and found five apparent violations of RCRA's requirements for container labeling and marking requirements, less than 90-day accumulation time frame, hazardous waste training, and manifest requirements. FDEP did not pursue formal enforcement and instead provided compliance assistance and verified that the facility had returned to compliance

10) Opening Conference

On February 05, 2025, EPA inspector Kayla Acosta, accompanied by FDEP inspector Jade Knight, FDEP Environmental Consultant Kaitlyn Edwardo, and FDEP Environmental Manager Jeff Gregg,

arrived at GCLSS at approximately 10:00 AM. Ivan Lopez, Facility Manufacturing Engineer and Project Manager, immediately received the inspectors. Mr. Lopez and the inspectors were joined by Brooke Kessinger, Associate Director of Operations, Ashley Blondek, EHS Specialist, Majid Khan, Senior Facilities Manager, and Dwayne Clark, Manufacturing Operations Principal Specialist, for the opening conference. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that 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 also 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.

Facility representatives 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 Facility representatives led the inspectors on a tour of the facility operations.

11) Inspection Observations

SHIPPING DOCK:

Incoming parts are received through the shipping dock and staged before going to Receiving Inspection for evaluation. The inspectors observed one 10-gallon empty container used for the collection of used solvent-contaminated wipes. Solvent-contaminated wipes are managed as hazardous waste at the facility due to additional contaminants such as heavy metal debris.

DISASSEMBLY:

This area is used to disassemble landing gear parts before they are inspected and moved to respective stations for maintenance and repair. The inspectors observed the following waste (Photos 01-05):

- One 55-gallon container in a SAA designated for spent aerosol cans generated in the Disassembly Area. The container was labeled "Hazardous Waste", marked with an indication of the hazard of the contents, and closed.
- One 55-gallon container of used oil equipped with a funnel, within an overpack container. The container was labeled used oil. There was some used oil observed in the secondary containment; however, it was less than 10% of the containment.
- One 250-gallon tote of used oil. The container was labeled "Used Oil". There was some used oil observed in the secondary containment; however, it was less than 10% of the containment.

- Two 5-gallon containers in a SAA designated for solvent-contaminated wipes generated in the Disassembly Area. These containers are emptied after each shift into a 55-gallon container within the same SAA designated for solvent-contaminated wipes. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One 55-gallon container in the SAA designated for solvent-contaminated wipes, paint, and debris generated in the Disassembly Area. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents. The total volume of observed solvent-contaminated wipes and debris was less than 55-gallons.

RECEIVING INSPECTION:

In this area, receiving inspectors review customer paperwork to inform them of what the incoming parts need for maintenance and/ or repair. The inspectors will then examine the incoming parts and decide what department they need to go to next. The inspectors observed one 5-gallon closed container for solvent-contaminated wipes (Photo 06). The container was labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and closed.

WASH AREA:

This area is used to clean parts and remove any debris or oil residues. The floor in this area is sloped towards a drain that leads to a secondary containment pad underneath the floor. The secondary containment pad is connected to an oil-water separator located behind the building, which is serviced by Cliff Berry, Inc. The inspectors observed a closed Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks (Photo 07). The inspectors also observed a vacuum which is used for cleaning dust and debris from the workstation area. The inspectors requested a waste profile for waste material that is collected from the vacuum. This waste profile was provided by the facility after the inspection on February 25, 2025, and the vacuum waste is managed as non-hazardous waste. The inspectors observed the following waste (Photos 08-13):

- One 55-gallon container in a SAA designated for solvent-contaminated wipes, paint, and debris generated in the Wash Area. The container was labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and closed.
- One 55-gallon container for grinding sludge. The container was closed and labeled “Non-Hazardous Waste”. The inspectors requested a waste profile for this waste stream.
- One 300-gallon tote of used oil. The container was labeled “Used Oil”.
- One 250-gallon tote of used oil. The container was labeled “Used Oil”.
- Two 5-gallon buckets of mop water. Facility personnel stated that used mop water is managed as hazardous waste after each use and transferred into a 250-gallon hazardous waste tote in the wastewater treatment plant (Photo 21). The inspectors did not observe personnel adding, removing, or consolidating waste in the two open buckets, which were not labeled with the words “Hazardous Waste” or marked with an indication of the hazard of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], A container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)(ii)], a generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

MEDIA BLAST BOOTH:

This large and enclosed media blast booth is used for sand blasting parts coming from disassembly. Hazardous waste solids contaminated with cadmium are collected in two bag houses within the enclosed booth. GCLSS manages one SAA at each bag house. The booth was in operation at the time of the inspection and required PPE and a respirator to enter; however, inspectors were provided with a photo of the SAAs inside. One 55-gallon container of hazardous waste solids with cadmium were shown at each SAA inside the media blast booth. Each container was closed, labeled “Hazardous waste”, but missing an indication of the hazard of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], a generator must mark or label its container 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Ashley Blondek provided photos of the two containers at the baghouse SAAs marked with indication of the hazards of the contents via email on February 25, 2025.

Just outside of the Media Blast Booth the inspectors observed the following waste (Photos 14-15):

- One 55-gallon container in a SAA designated for contaminated debris generated in the Media Blast Booth Area. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

- One 5-gallon container in a SAA designated for solvent-contaminated wipes generated in the Media Blast Booth Area. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

MACHINE SHOP:

The Machine Shop is used for general repair of parts using cutting machinery. There is a cutting machine that uses coolant and is disposed of with used oil once it is determined to be waste. The inspectors reminded facility personnel that any containers holding used oil must be labeled or marked clearly with the words “used oil.” The inspectors observed the following waste (Photos 16-18):

- Five 5-gallon containers in the SAA designated for solvent-contaminated wipes generated in the Machine Shop Area. Containers are emptied after each shift into one 55-gallon container designated for solvent-contaminated wipes and PPE within the Machine Shop. All containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One 10-gallon container in the SAA designated for solvent-contaminated wipes generated in the Machine Shop Area. The container is emptied after each shift into one 55-gallon container designated for used rags contaminated with solvent, paint, and debris generated in the Machine Shop Area. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One 55-gallon container in a SAA designated for spent aerosol cans generated in the Machine Shop Area. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One 55-gallon container in a SAA designated for used rags with solvent, paint, and debris generated in the Machine Shop Area. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents. The total volume of observed solvent-contaminated wipes and debris was less than 55-gallons.
- One 1-gallon container in a SAA designated for solids contaminated with acetone and lead generated in the Machine Shop Area. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One 5-gallon container of shredded metal that is sent for recycling.

NON-DESTRUCTIVE TESTING (NDT):

NDT testing is used to assess parts for any defects such as cracks by using liquid penetrating testing that will glow in the dark with the use of black lights to visualize any cracks or defects. Active testing was occurring, and the inspectors could not enter without proper PPE. Facility personnel informed the inspectors that no hazardous waste is generated in this area.

SHOT PEEN AREA:

Shot peening involves the process of striking landing gear parts with steel particles at high speed to enhance resistance to stress on the surface of parts. This area includes a dust collector which generates non-hazardous waste. The inspectors observed two 55-gallon containers of

spent media that were closed and labeled non-hazardous waste. The inspectors requested the waste profiles for this waste stream. On February 25, 2025, facility personnel provided the waste profile for the waste Shot Peen blast media which is managed as non-hazardous waste.

WASTEWATER TREATMENT PLANT and CAA 2:

The wastewater treatment plant (WWTP) is situated on a secondary containment pad in a secured fenced-in area within the facility. Both the WWTP containment pad and the containment pad for the electroplating lines lead to a secondary containment pit. Any liquid in the containment pit is pumped out and placed into totes and disposed of as hazardous waste. There is also a CAA located within the WWTP secured fenced-in area for hazardous waste generated in the WWTP and nearby SAAs. This area is equipped with emergency equipment such as a fire extinguisher and spill kit. A “No Smoking” sign is located at the entrance of the WWTP (Photo 19). Wastewater from rinse tanks on the electroplating lines is treated and recycled in the WWTP. The water goes through ion exchange and heavy metals are removed through reduction and chemical precipitation and then goes through an evaporator. A distillation unit is used to remove brine water. Distilled water is then fed back into plating rinse tanks. A filter press is used to capture WWTP sludge from the evaporator which is disposed of as hazardous waste. The inspectors observed the following waste in CAA 2 (Photos 20-23):

- Three 250-gallon closed totes containing magnetic particle fluid labeled as “Non-Hazardous Waste”.
- One 250-gallon closed tote of mop water contaminated with cadmium and chromium. The container was labeled “Hazardous Waste”, dated 01/31/2025, but missing an indication of the hazard of the contents.
- One 250-gallon tote of brine water from the distillation unit. The tote has an opening port at the top which was temporarily open for active venting purposes. The container was labeled “Hazardous Waste, dated 02/05/2025, and missing an indication of the hazard of the contents.
- One 55-gallon container of filter cake. The container was closed, labeled “Hazardous Waste”, dated 01/23/2025, but missing an indication of the hazard of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(B)], a large quantity generator must mark or label its containers with the following: (B) 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Facility personnel immediately marked the containers with indications of the hazards of the contents for toxicity.

ELECTROPLATING LINES:

Landing gear parts that require electroplating as part of maintenance and repair undergo the following processes: surface preparation, cleaning to remove dirt and grease, chemical etching and stripping, chromate conversion coating, and cadmium, chromium, and nickel plating. There are 9 plating lines in total, and GCLSS manages one SAA for accumulating solvent-contaminated wipes generated in the plating area. Each plating line has a 5-gallon container for solvent-contaminated wipes which are emptied after each shift into a 55-gallon container which is dated and transferred to CAA 1 when full. At the time of the inspection, it appeared that the total volume of solvent-contaminated wipes accumulating in the plating area was less than 55-gallons. The floor in the cleaning preparation area was recently sealed with epoxy paint; however, it appeared to be peeling off. The facility personnel stated that the coating was done incorrectly which resulted in the peeling of the epoxy paint. Facility personnel stated that the floor would be re-sealed. The inspectors observed the following waste (Photos 24-29 & 31):

- 10 5-gallon containers in the SAA designated for solvent-contaminated wipes (contaminated with acetone and lead) generated in the Electroplating Area. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One 55-gallon container in the SAA designated for solvent-contaminated wipes (acetone and methyl ethyl ketone) generated in the Electroplating Area. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One 25-gallon container labeled solvent transfer drum underneath a drip pan used in the cleaning process for parts that will undergo electroplating. After each use, the solvent is transferred to a 55-gallon container in the SAA designed for spent solvent generated in the Electroplating Area. This container was labeled "Hazardous Waste" and marked with an indication of the hazard of the contents.
- One closed Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks.
- One 55-gallon container in the SAA designated for spent aerosol cans generated in the Electroplating Area. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One 55-gallon container in the SAA designated for chromium debris, PPE generated in the Electroplating Area. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One 55-gallon container in the SAA designated for cadmium debris, PPE generated in the Electroplating Area. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.

- Towards the end of the line was one 250-gallon container that was open and in the process of transferring plating bath solution that has high carbonate. Once the transfer of plating solution is complete, the tote is transferred to CAA 1. The container was labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated 01/27/2025.

POLISHING:

Polishing is part of the preparation process for parts that will undergo electroplating. The inspectors observed one 55-gallon container in a SAA designed for solvent-contaminated wipes and debris generated in the Polishing Area (Photo 30). The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

ALUMINUM OXIDE BLASTING BOOTH:

The aluminum oxide blasting booth is an enclosed abrasive blasting operation for parts that will undergo electroplating. This system is equipped with a baghouse which also has a SAA for hazardous waste located outside of the building. This area is described later in this report.

GRIND SHOP:

This area is for chrome-plated parts that needed to be grinded down to a specific size and finish. The inspectors observed the following waste (Photos 32-34):

- One 55-gallon closed container of oily grinding sludge, labeled as non-hazardous waste.
- One 55-gallon container in the SAA designated for used solvent-contaminated wipes, paint, and debris generated in the Grind Shop. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One 15-gallon container of used oil from the grinding machine. The container was closed and labeled “Used Oil”. Filter paper in the grinding machines is replaced every four to six months and disposed of as non-hazardous waste.
- Two 5-gallon containers in the SAA designated for solvent-contaminated wipes generated in the Grind Shop. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

BUSHING INSTALLATION:

This area is used for the maintenance and repair of landing gear bushing. This area is situated on top of a secondary containment pad which collects cutting oil. This containment pad gets serviced and pumped out by Cliff Berry, Inc. twice a year. The inspectors observed the following waste (Photo 35):

- Six 5-gallon containers in the SAA designated for solvent and lead-contaminated wipes generated at the Bushing Area. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One 20-gallon container, which was empty, in the SAA designated for lead-contaminated solids generated in the Bushing Area.

PAINT DEPARTMENT:

The inspectors were escorted around the Paint Department by Nilo Tapanes, Lead of the Paint Department. There are three paint booths in the Paint Department. One paint booth was not operational at the time of the inspection. Daily readings on air pressure are conducted for each paint booth to ensure there are no emission leaks. Paint booth filters are changed as needed depending on the pressure differential limits. The inspectors observed the following waste (Photos 36-39):

- Three 5-gallon containers in the SAA designated for solvent-contaminated wipes generated in the Paint Department. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One 3-gallon container of used batteries. The container was closed, labeled "Used Batteries", and dated 03/21/2024.

Paint Drying Room:

- Two 5-gallon containers in the SAA designated for solvent-contaminated wipes generated in the Paint Department. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- One closed Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks.

ASSEMBLY:

This area one of the final steps in maintenance and repair. Landing gear parts are assembled and packaged. Parts are then placed in a shipping area and shipped offsite. The inspectors observed the following waste (Photos 40-43):

- One 10-gallon container in the SAA designated for solvent-contaminated wipes generated in the Assembly Area. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- 10 5-gallon containers in the SAA designated for solvent-contaminated wipes generated in the Assembly Area. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.
- Six Safety-Kleen closed Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks.
- Two 55-gallon SAA containers of solvent-contaminated wipes, paint, and debris of solvent-contaminated wipes. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents. Facility personnel stated that one of these 55-gallon containers were incorrectly moved to this area during cleaning/ reorganizing of another area adjacent to the Assembly Department. Facility personnel immediately moved the second 55-gallon container of solvent-contaminated wipes, paint, and debris back to the other area during the inspection.
- One 3-gallon container of universal waste batteries. The container was closed, labeled "Used Batteries", and dated 03/21/2024.

Warning for potential excess of 55 gallons: Although GCLSS may manage more than one container in the same SAA, please note that the SAA Permit Exemption limits the total volume of waste accumulated in this area at any given time to be no more than 55 gallons. Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [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 Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

Federal Assembly Line: Exclusively for federal aircraft landing gear assembly. No photos allowed for this area.

- Three 5-gallon containers in the SAA designated for solvent-contaminated wipes generated in the Assembly Area. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

OUTSIDE—DUST COLLECTOR:

The SAA for the aluminum oxide blast media is located on the outside of the building connected to a baghouse on the south side. The inspectors observed one closed container of hazardous waste solids with cadmium. The container was closed, labeled “Hazardous Waste”, but missing an indication of the hazard of the contents (Photo 44).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], a generator must mark or label its container 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Facility personnel immediately marked the containers with indications of the hazards of the contents for toxicity.

CAA 1:

CAA 1 is located on the east side of the building in an enclosed fire-rated room accessible only from the outside of the building. The CAA is equipped with a sprinkler system, eyewash station, and spill control equipment. A “No Smoking” sign is located at the entrance of the CAA (Photo 45). The oldest date observed in the CAA was from 11/19/2024, indicating that the facility is compliant with the 90-day accumulation time limit. The inspectors observed the following waste (Photos 46-56):

- Three 60-gallon laboratory pack containers. The containers were pending TCLP analysis for a hazardous waste determination to be made. The containers were not labeled. The inspectors explained that these containers should be managed as hazardous waste until laboratory results are obtained for an official hazardous waste determination to be made. As such, the containers should be labeled as hazardous waste—pending analysis.

Facility personnel immediately placed hazardous waste labels on these containers with accumulation start dates—pending analysis.

- One 250-gallon tote of magnetic particle fluid labeled as non-hazardous waste.
- Five 250-gallon totes of hazardous waste. The containers were closed, labeled “Hazardous waste”, dated, and marked with a D.O.T. Class 9 placard. Because the Class 9 DOT label does not indicate any specific hazard associated with the waste, the EPA has determined that it is not appropriate to meet the RCRA indication of hazards labeling standard ([Frequent Questions About Implementing the Hazardous Waste Generator Improvements Final Rule | US EPA](#)).
- 10 cubic-yard cardboard boxes of hazardous waste solids. The containers were closed, labeled “Hazardous waste”, dated, and marked with a D.O.T. Class 9 placard. Because the Class 9 DOT label does not indicate any specific hazard associated with the waste, the EPA has determined that it is not appropriate to meet the RCRA indication of hazards labeling standard.
- 36 55-gallon containers of hazardous waste. The containers were closed, labeled “Hazardous Waste”, dated and marked with an indication of the hazard of the contents.
- One 4-ft cardboard box of used lamps. The container was closed, labeled “Universal Waste—Lamps”, and dated 02/05/2025.
- Two 5-gallon containers of used batteries. The containers were missing universal waste labels and were not dated to indicate the start of accumulation.

WARNING FOR CONTAINERS STORING HAZARDOUS WASTE: Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(A-C)], a large quantity generator must mark or label its containers with the following: (A) The words “Hazardous Waste”; (B) 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and (C) The date upon which each period of accumulation begins clearly visible for inspection on each container.

Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(a)], universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);”.

Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(c)], a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by any of the options listed in 40 C.F.R. § 273.15(c) (1-6).

Facility personnel immediately placed universal waste labels on the used battery containers and marked both containers with accumulation start dates of 02/05/2025.

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 Integrated Contingency Plan dated 2025 and was currently undergoing updates.

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.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Majid Khan is listed as the primary emergency coordinator, and other individuals are listed in the order in which they will assume responsibility as alternates.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Integrated Contingency Plan (and its quick reference guide) was submitted to the Florida Division of Emergency Management, National Response Center, FDEP, Miami-Dade County Emergency Management, and Palmetto General Hospital. Proof of submission was provided. The updated plan with the quick reference guide will be re-sent once updates have been finalized.

The quick reference guide includes the types/names of hazardous waste in layman's terms 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; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; 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).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for employees handling hazardous waste such as Dwayne Clark, Manufacturing Operations Principal Specialist; Ashely Blondek, EHS Specialist; and others who handle hazardous waste and sign manifests. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. The facility provided a written description of the type and amount of both introductory and continuing training to be given to each person which includes D.O.T. hazardous materials training for employees signing manifest and RCRA refreshers online by ProTEQ. The inspectors reviewed records of employee hazardous waste training completed for the last three years.

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 for the past three years (2022-2025). Hazardous waste manifest records show that hazardous wastes and universal wastes are routinely shipped to U.S. Ecology, Inc. Tampa located in Tampa, FL (EPA ID FLD981932494) and Tradebe located in Millington, FL and the most recent shipment was made on 01/27/2025 and was sent to U.S. Ecology, Inc. Tampa. Final signed versions for previous years were available onsite, while other more recent final signed manifest records were accessed online by facility personnel through e-Manifest. No issues were observed for the manifest records.

Weekly Inspection Records:

The inspectors reviewed GCLSS's available records of inspections of the hazardous waste CAAs since 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 records include the date and time of the inspection and the name of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log. The most recent weekly inspection of the CAAs was conducted on 02/04/2025. No issues were observed for the weekly inspections.

Emergency Equipment Inspections:

Inspections of emergency equipment such as spill kits, fire equipment, eyewash and shower stations are conducted monthly by CBRE, Inc. and were available for review. No issues were noted.

Waste Determinations:

PPG, who is an onsite vendor, manages safety data sheets for the facility. U.S. Ecology manages waste profiles and waste records of waste determinations for the facility which are accessible online.

Biennial Report:

The 2023 biennial report was available onsite for review and was submitted in 2024.

13) Closing Conference

The inspectors conducted the exit meeting with facility personnel. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Facility personnel agreed to provide inspectors with the following records within two weeks of the inspection: waste profiles for vacuum waste from the Wash Area, spent blast media from the Shot Peen process, and the oily grinding sludge from the Wash Area, the updated contingency plan and quick reference guide once finalized, an updated submission to FDEP of the 8700-12 form for notification of regulated waste activities, and photos of SAA containers in the media blasting booth that were missing indication of the hazards of the contents. On February 25, 2025, Ashley Blondek provided these records via email.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

KAYLA ACOSTA Digitally signed by KAYLA
ACOSTA
Date: 2025.04.04 08:24:48 -04'00'

Kayla Acosta
Physical Scientist

16) Concurrence

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2025.04.04 08:53:01 -04'00'

for Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

[56] Photos taken on: February 05, 2025

Photos taken by: Kayla Acosta

Photos taken with iPad

EPA Property Tag: SS8386



Photo 01			IMG-202502051109439431985788.jpg
02/05/2025 11:09 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Disassembly			25.9271651, -80.25415613
55-gallon SAA container of spent aerosol cans. The container was labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and closed.			



Photo 02			IMG-202502051112071272045753.jpg
02/05/2025 11:12 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Disassembly			25.92716607, -80.25402239
55-gallon container of used oil equipped with a funnel, within an overpack container. The container was labeled used oil. There was some used oil observed in the secondary containment; however, it was less than 10% of the containment.			



Photo 03			IMG-2025020511121312132319577.jpg
02/05/2025 11:12 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Disassembly			25.92716118, -80.2540724
250-gallon tote of used oil. The container was labeled "Used Oil". There was some used oil observed in the secondary containment; however, it was less than 10% of the containment.			



Photo 04			IMG-202502051117041742026456.jpg
02/05/2025 11:17 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Disassembly			25.92716195, -80.25410168
5-gallon SAA containers of solvent-contaminated wipes. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 05			IMG-2025020511185918592079414.jpg
02/05/2025 11:18 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Disassembly			25.92721186, -80.25406514
55-gallon SAA container of solvent-contaminated wipes, paint, and debris. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 06			IMG-202502051121002102706539.jpg
02/05/2025 11:21 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Receiving inspection			25.92716692, -80.25417804
One 5-gallon closed container for solvent-contaminated wipes (Photo 06). The container was labeled "Hazardous Waste", marked with an indication of the hazard of the contents, and closed.			



Photo 07			IMG-2025020511241124112075326.jpg
02/05/2025 11:24 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Wash Area			25.92718341, -80.25413047
Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks.			



Photo 08			IMG-2025020511245924592220399.jpg
02/05/2025 11:24 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Wash Area			25.92719872, -80.25405575
55-gallon container for solvent-contaminated wipes, paint, and debris. The container was labeled "Hazardous Waste", marked with an indication of the hazard of the contents (opposite side of container), and closed.			



Photo 09			IMG-2025020511293029302116482.jpg
02/05/2025 11:29 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Wash Area			25.92717761, -80.25414125
55-gallon container for grinding sludge. The container was closed and labeled "Non-Hazardous Waste". The inspectors requested a waste profile for this waste stream.			



Photo 10			IMG-2025020511301530152356059.jpg
02/05/2025 11:30 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Wash Area			25.92722876, -80.25414129
300-gallon tote of used oil. The container was labeled "Used Oil".			



Photo 11			IMG-2025020511302430242153104.jpg
02/05/2025 11:30 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Wash Area			25.92722785, -80.25414081
250-gallon tote of used oil. The container was labeled "Used Oil".			



Photo 12			IMG-2025020511312931292717140.jpg
02/05/2025 11:31 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Wash Area			25.92718605, -80.25417695
5-gallon buckets of mop water. Managed as hazardous waste.			



Photo 13			IMG-2025020511313331332531076.jpg
02/05/2025 11:31 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Wash Area			25.92718605, -80.25417695
5-gallon buckets of mop water. Managed as hazardous waste.			



Photo 14			IMG-2025020511413841381938218.jpg
02/05/2025 11:41 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Media Blast			25.92719325, -80.25416049
55-gallon SAA container of contaminated debris. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 15			IMG-2025020511461846181994308.jpg
02/05/2025 11:46 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Media Blast			25.92724983, -80.25376856
5-gallon SAA container for solvent-contaminated wipes. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 16			IMG-2025020511563256322714224.jpg
02/05/2025 11:56 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Machine shop			25.9272131, -80.25396161
5-gallon SAA containers of solvent-contaminated wipes. All containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 17			IMG-2025020511585758571979230.jpg
02/05/2025 11:58 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Machine shop			25.9272449, -80.25393168
55-gallon SAA container of spent aerosol cans. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 18			IMG-202502051159025921982422.jpg
02/05/2025 11:59 AM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Machine shop			25.92724119, -80.2539161
55-gallon container of used rags with solvent, paint, and debris. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 19			IMG-202502051206296292821037.jpg
02/05/2025 12:06 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
WWTP and CAA 2			25.92732874, -80.25353826
Entrance of WWTP and CAA 2			



Photo 20			IMG-2025020512113111311996976.jpg
02/05/2025 12:11 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
WWTP and CAA 2			25.92732304, -80.25350232
250-gallon closed tote containing magnetic particle fluid labeled as "Non-Hazardous Waste".			



Photo 21			IMG-2025020512124512452639594.jpg
02/05/2025 12:12 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
WWTP and CAA 2			25.92724343, -80.25349529
250-gallon closed tote of mop water contaminated with cadmium and chromium. The container was labeled "Hazardous Waste", dated 01/31/2025, but missing an indication of the hazard of the contents.			



Photo 22			IMG-2025020512152315231864864.jpg
02/05/2025 12:15 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
WWTP and CAA 2			25.9273551, -80.2533901
250-gallon tote of brine water from the distillation unit. The tote has an opening port at the top which was open for venting purposes. The container was labeled "Hazardous Waste, dated 02/05/2025, and missing an indication of the hazard of the contents.			



Photo 23			IMG-2025020512185918591760162.jpg
02/05/2025 12:18 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
WWTP and CAA 2			25.9273171, -80.25350426
55-gallon container of filter cake. The container was closed, dated 01/23/2025, but missing an indication of the hazard of the contents.			



Photo 24			IMG-2025020512244924491984748.jpg
02/05/2025 12:24 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Electroplating Line			25.92730192, -80.25360557
One of 10 5-gallon SAA containers for solvent-contaminated wipes (contaminated with acetone and lead). The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 25			IMG-2025020512261226122378842.jpg
02/05/2025 12:26 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Electroplating Line			25.92728466, -80.2536805
55-gallon SAA container of solvent-contaminated wipes (acetone and methyl ethyl ketone). The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 26			IMG-2025020512263026302188194.jpg
02/05/2025 12:26 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Electroplating Line			25.92723769, -80.25358665
Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks.			



Photo 27			IMG-2025020512265026502070078.jpg
02/05/2025 12:26 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Electroplating Line			25.92728349, -80.25360613
55-gallon SAA container of spent aerosol cans. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 28			IMG-202502051241074172614280.jpg
02/05/2025 12:41 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Electroplating Line			25.92729644, -80.25365068
25-gallon container labeled solvent transfer drum underneath a drip pan used in the cleaning process for parts that will undergo electroplating. After each use, the solvent is transferred to a 55-gallon SAA container.			



Photo 29			IMG-202502051243034332180491.jpg
02/05/2025 12:43 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Electroplating Line			25.92735847, -80.25350117
55-gallon SAA container chromium debris, PPE. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.			



Photo 30			IMG-202502051252045242298418.jpg
02/05/2025 12:52 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Polishing			25.92727962, -80.25365052
55-gallon SAA container of solvent-contaminated wipes and debris. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.			



Photo 31			IMG-202502051302402402110238.jpg
02/05/2025 01:02 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Electroplating Line			25.92713151, -80.2534211
250-gallon container that was open and in the process of transferring plating bath solution that has high carbonate. Once the transfer of plating solution is complete, the tote is transferred to CAA 1. The container was labeled "Hazardous Waste", marked with an indication of the hazard of the contents, and dated 01/27/2025.			



Photo 32			IMG-202502051305265261988197.jpg
02/05/2025 01:05 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Grind shop			25.92712479, -80.25342954
55-gallon SAA container of used solvent-contaminated wipes, paint, and debris. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 33			IMG-202502051305325322015120.jpg
02/05/2025 01:05 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Grind shop			25.92712479, -80.25342954
55-gallon closed container of oily grinding sludge, labeled as non-hazardous waste.			



Photo 34			IMG-2025020513145514553863150.jpg
02/05/2025 01:14 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Bushing installation			25.9271249, -80.25393968
One of two 5-gallon SAA containers of solvent-contaminated wipes. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 35			IMG-2025020513151815182257390.jpg
02/05/2025 01:15 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Bushing installation			25.9271222, -80.25393518
One of six 5-gallon SAA containers of solvent and lead-contaminated wipes. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 36			IMG-2025020513232823282107624.jpg
02/05/2025 01:23 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Paint Department			25.9271346, -80.25390386
One of 5-gallon SAA container for solvent-contaminated wipes. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 37			IMG-2025020513255425541920003.jpg
02/05/2025 01:25 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Paint Department			25.92709752, -80.25393831
One 3-gallon container of used batteries. The container was closed, labeled "Used Batteries", and dated 03/21/2024.			



Photo 38			IMG-2025020513295229522005691.jpg
02/05/2025 01:29 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Paint Department			25.92713221, -80.25404427
Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks.			



Photo 39			IMG-202502051330033032177082.jpg
02/05/2025 01:30 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Paint Department			25.9271344, -80.25403357
5-gallon SAA containers of solvent-contaminated wipes. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 40			IMG-2025020513333833381738496.jpg
02/05/2025 01:33 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Assembly			25.9271565, -80.25409911
5-gallon SAA containers of solvent-contaminated wipes. The containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.			



Photo 41			IMG-2025020513341334132098121.jpg
02/05/2025 01:34 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Assembly			25.92717346, -80.25410031
3-gallon container of universal waste batteries. The container was closed, labeled "Used Batteries", and dated 03/21/2024.			



Photo 42			IMG-2025020513352035201725921.jpg
02/05/2025 01:35 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Assembly			25.92715214, -80.25411913
Safety-Kleen closed Safety-Kleen parts washer which gets serviced by Safety-Kleen every 6 weeks.			



Photo 43			IMG-20250205133737372189360.jpg
02/05/2025 01:37 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Assembly			25.92716489, -80.2540933
One of two 55-gallon SAA containers of solvent-contaminated wipes, paint, and debris. of solvent-contaminated wipes. The containers were closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.			



Photo 44			IMG-2025020513442444243477574.jpg
02/05/2025 01:44 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
Outside dust collector			25.92694957, -80.25369228
SAA container of hazardous waste solids with cadmium. The container was closed, labeled “Hazardous Waste”, but missing an indication of the hazard of the contents.			



Photo 45			IMG-2025020514531053103985327.jpg
02/05/2025 02:53 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92724069, -80.25297243
Entrance to CAA 1.			



Photo 46			IMG-2025020514563756371891107.jpg
02/05/2025 02:56 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92722393, -80.25298778
60-gallon laboratory pack container. The containers (3) were pending TCLP analysis for a hazardous waste determination to be made. The containers were not labeled.			



Photo 47			IMG-2025020514564456441869180.jpg
02/05/2025 02:56 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92723825, -80.25297621
60-gallon laboratory pack container. The containers (3) were pending TCLP analysis for a hazardous waste determination to be made. The containers were not labeled.			



Photo 48			IMG-2025020514582358232107596.jpg
02/05/2025 02:58 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92706493, -80.25297013
60-gallon laboratory pack container. The containers (3) were pending TCLP analysis for a hazardous waste determination to be made. The containers were not labeled.			



Photo 49			IMG-202502051506496491798087.jpg
02/05/2025 03:06 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92710109, -80.25318223
250-gallon tote of hazardous waste. The container was closed, labeled "Hazardous waste", dated, and marked with a D.O.T. Class 9 placard which does not indicate the hazard of the contents.			



Photo 50			IMG-202502051507487481922867.jpg
02/05/2025 03:07 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.9271249, -80.25304269
250-gallon totes of hazardous waste. The containers were closed, labeled "Hazardous waste", dated, and marked with a D.O.T. Class 9 placard which does not indicate the hazard of the contents.			



Photo 51			IMG-202502051507537531971781.jpg
02/05/2025 03:07 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.9271249, -80.25304264
250-gallon totes of hazardous waste. The containers were closed, labeled "Hazardous waste", dated, and marked with a D.O.T. Class 9 placard which does not indicate the hazard of the contents.			



Photo 52			IMG-2025020515172317232154641.jpg
02/05/2025 03:17 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92713884, -80.25299795
55-gallon containers of hazardous waste. The containers were closed, labeled "Hazardous Waste", dated and marked with an indication of the hazard of the contents.			



Photo 53			IMG-2025020515184018402759083.jpg
02/05/2025 03:18 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92709317, -80.25300173
Cubic yard cardboard box of hazardous waste solids. Closed, labeled "Hazardous Waste" date, but was missing an indication of the hazard of the contents. This was corrected onsite during the inspection.			



Photo 54			IMG-2025020515191219122303610.jpg
02/05/2025 03:19 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.9271306, -80.25300781



Photo 55			IMG-202502051523002301857386.jpg
02/05/2025 03:23 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA 1			25.92711617, -80.25305948
4-ft cardboard box of used lamps. The container was closed, labeled "Universal Waste—Lamps", and dated 02/05/2025.			

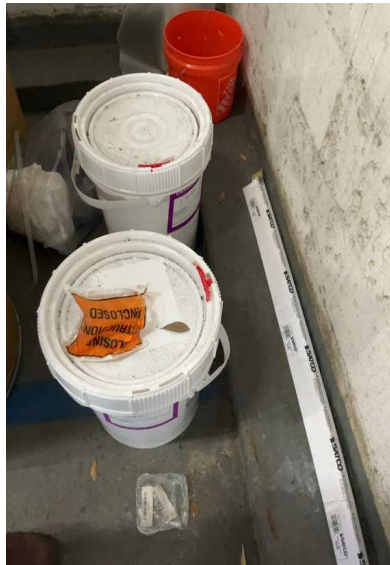


Photo 56			IMG-2025020515231023102182450.jpg
02/05/2025 03:23 PM (ET)	No CBI	No PII	Photographer: Kayla Acosta
CAA			25.9272724, -80.25295385
Two 5-gallon containers of used batteries. The containers were missing universal waste labels and were not dated to indicate the start of accumulation.			