

N.C. DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES

FILE DOCKET

Circle one:
G, I, P, GW, C

DATE	ITEM
① 11.3.92	CEI - Comprehensive Evaluation Inspection
② 11.3.92	NOU # 93-02A
③ 12.2.92	CSE report
④ 5.14.93	NOU # 93-269
⑤ 1.10.94	CEI Report - Comprehensive Evaluation Imp.
⑥ 3.9.94	NOU # 94-074
⑦ 4.12.94	CSE
⑧ 11-07-95	CEI Report
⑨ 6-24-97	CEI report
⑩ 6-24-97	CSE report
⑪ 10-9-97	CEI report
⑫ 1-8-98	CEI report
⑬ 11-30-99	CEI Report
⑭ 1-20-00	CSE Report
⑮ 2-2-00	Enforcement Package - information
⑯ 7-24-00	CSE Report
⑰ 10-06-00	RCRA Compliance Evaluation

Purpose: The attached form will be used as a file folder docket. GAO and EPA have requested that we list the content of each file folder and attach file information to the folders. This file folder docket will be used to provide a folder content list.

Preparation: This form will be completed by the Branch file clerk. It identifies what document it is -- a letter, a report, etc. Filing is by date with the last entry on the top of the file folder and the bottom of the file docket.

Disposition: This form may be destroyed in accordance with the Environmental Health, Solid & Hazardous Waste Section of the Records Disposition Schedule published by the North Carolina Division of Archives and History.

Additional forms may be ordered from:

Solid & Hazardous Waste Management Branch
Division of Health Services
P. O. Box 2091
Raleigh, NC 27602-2091



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

I
U.S. Airways
NCD 986 227 957

17

OCT - 6 2000

4WD-RCRA

Mr. Tim Cooksey
Maintenance Manager
U.S. Airways
P.O. Box 19368
5020 Hangar Road
Charlotte, North Carolina 28219

SUBJ: RCRA Compliance Evaluation Inspection for U.S. Airways
(NCD 986 227 957)

Dear Mr. Cooksey:

On July 24, 2000, the United States Environmental Protection Agency (EPA) and the North Carolina Department of Environment and Natural Resources (NCDENR) conducted a joint hazardous waste compliance inspection at the subject facility in Charlotte, North Carolina.

Enclosed is EPA's Resource Conservation and Recovery (RCRA) Inspection Report which indicates that no violations of RCRA were discovered. A copy of this report has also been forwarded to NCDENR, which would be the lead agency for addressing any violations if identified during this inspection.

If you have any questions, please contact Kris Lippert, of my staff, at (404) 562-8605.

Sincerely yours,

Kenneth R. Lapierre, Chief
North Enforcement & Compliance Section
RCRA Enforcement & Compliance Branch

Enclosure

cc: Jill Pafford w/encl., NCDENR - Raleigh
Doug Holyfield w/encl., NCDENR - Winston Salem
Joseph Parker w/encl., NCDENR - Mooresville

RCRA Inspection Report

1) Inspector and Author of Report

Kristin A. Lippert, Environmental Engineer
US Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8605

2) Facility Information

U.S. Airways
5020 Hanger Road
Charlotte, North Carolina 28219
NCD 986 227 957

3) Responsible Official

Tim Cooksey
Maintenance Manager
U.S. Airways
5020 Hanger Road
Charlotte, North Carolina 28219
(704)359-2018

4) Inspection Participants

Kris Lippert, EPA/RCRA Compliance & Enforcement
Joseph Parker, NCDENR
Dennis Watson, U.S. Airways

5) Date of Inspection

July 24, 2000

6) Applicable Regulations

RCRA §3007; 40 C.F.R. Parts 260, 261, 262, 264, 265, 266, 268, 270 and 279; and
North Carolina Hazardous Waste Management Rules.

7) Purpose of Inspection

To conduct an unannounced joint inspection and determine the facility's compliance with the applicable RCRA hazardous waste regulations.

8) Facility Description

U.S. Airways is located at the Charlotte Regional Airport. The facility provides maintenance to its commercial aircrafts and ground support equipment. Activities conducted at the facility include painting, renovation of the interior of airplanes, aircraft maintenance, and ground support equipment.

U.S. Airways is a large quantity generator. Hazardous wastes generated at the facility include degreasing wastes, paint wastes, spent batteries, oxygen canisters, and cleaning residues.

9) Findings

On November 30, 1999, NCDENR preformed a Compliance Evaluation Inspection (CEI) at U.S. Airways after which a Ticket Notice of Violation (NOV), Docket #2000-037, was issued. On January 20, 2000, NCDENR returned to the facility for a Compliance Schedule Evaluation (CSE) to determine if previous violations had been corrected. U.S. Airways was found to be still in violation. Consequently, on March 28, 2000, the facility was issued a Short Form Compliance Order with Administrative Penalties, Docket #2000-081, for the following violations: open containers and failing to submit its 1997 Biennial Hazardous Waste Report.

This inspection was conducted to evaluate if U.S. Airways was in compliance with the Short Form Compliance Order with Administrative Penalties, Docket #2000-081, issued on March 28, 2000.

At the time of the inspection, all six (6) containers stored in the satellite area of Hanger Bay 3 were closed, labeled, and in good condition. The six (6) different types of waste stored in this area were: dirty fuels (D001, F001, & F002); used-oil; non-hazardous oil blankets; spent absorbents (D018 & F002); solid paint stripping (D007, F002, & F003); and waste cleaning solvents (D001, D007, & F001-F005).

In the paint booth satellite area, there was one (1) partially fully 55-gallon drum of waste flammable liquids (D001, F003, & F005). This container was closed, labeled, and in good condition.

File and Record Review:

During the inspection, U.S. Airways provided a copy of their 1997 Biennial Hazardous Waste Report.

10) Conclusion

U.S. Airways operates as a large quantity generator. Based on the inspection, EPA has determined that no violations were identified. EPA and NCDENR have, also, determined that the facility is in compliance with the Short Form Compliance Order with Administrative Penalties, Docket #2000-081, issued on March 28, 2000.

11) Signed

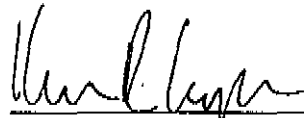


Kristin A. Lippert
Environmental Engineer

9/21/00

Date

12) Concurrence



Kenneth Lapierre, Chief
North Enforcement & Compliance Section
RCRA Enforcement and Compliance Branch

10/4/00

Date

$$\frac{007}{2000-081}$$

07/24/2000

* ORIGINAL FORM ATTACHED

Region 4 Compliance Data Entry Form - Side A

(Rev. 8/97)

16

FACILITY INFORMATION: EPA ID Number: <div style="border: 1px solid black; padding: 2px;">N C D 9 8 6 2 2 7 9 5 7</div>	Submittal Information	Initial By- Date -	Corrected By- Date -
	RCRA Comp. Section:	___/___/___	___/___/___
	Received:	___/___/___	___/___/___
	Entered/Returned:	___/___/___	___/___/___

Facility Name: US AIRWAYS City: CHARLOTTE

EVALUATION DATA: New: ___ Change: ☒ Delete: ___ (___ : Required)

Agency: S Date: 01/12/00 Mo. 01 Day 12 Year 00 Type: RCRA Control Number Data Entry Personnel: 107
Person: 0219 Reason: 011 CSE

Evaluation Comments:

(74) 1 : 01-20-2000 -> FACILITY NOT IN COMPLIANCE w/ NOV 2000-037 - SHORT FORM ORDER ISSUED
2 : 07-24-2000 -> FACILITY IN COMPLIANCE WITH SHORT FORM COMP. ORDER DOCKET # 2000-081

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) Date of determination:

- a SNC (SNN evaluation)

OR - no longer a SNC (SNN eval.) ☒

Same as above eval.: ___ or ___/___/___

VIOLATION DATA: New: ___ Change: ☒ Delete: ___

#1 Agency: S Type: GPT Date (mdy) Determined: 01/12/00 Class: ___

Priority: ___ Branch: 011 Person: 0219 Seq. Number (Data Entry): ___

Return to Compliance: 03/28/00 -- Scheduled -- Actual: 07/26/00 IN COMPLIANCE

Reg. Type: SIR Reg. Description (30): 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)

Comment (72): 4 SATELLITE ACCUMULATION CONTAINERS WERE NOTED OPEN DURING REINSPECTION ON 07/20/00

#2 Agency: S Type: GRR Date (mdy) Determined: 01/12/00 Class: ___

Priority: ___ Branch: 011 Person: 0219 Seq. Number (Data Entry): ___

Return to Compliance: 03/28/00 -- Scheduled -- Actual: 07/26/00 IN COMPLIANCE

Reg. Type: SIR Reg. Description (30): 40 CFR 262.40(a)

Comment (72): FAILED TO RETAIN OR OBTAIN A COPY OF THE 1997 ANNUAL REPORT - 01/20/00

ORIGINAL CEI: 11-30-99

TICKET NOV DOCKET #2000-037 ISSUED

ACTUAL REINSPECTION DATE: 01-20-00

- 2 REPEAT VIOLATIONS

- SHORT FORM COMP. ORDER w/ADMIN. PENALTY ISSUED

DOCKET # 2000-081

ACTUAL REINSPECTION DATE: 07-24-2000 IN COMPLIANCE

Continue violation data on Side B if necessary -

SITE HISTORY:

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: ☐ Change: ☐ Delete: ☐ (☐ : Required)

Agency: ☐ Type: ☐ Date: ☐/ ☐/ ☐ Seq.# (Data Entry) ☐

Person: ☐ Branch: ☐ Poll. Prev. Measures: ☐

Penalty Data
Proposed: \$ ☐/ ☐/ ☐ 1) Payments: \$ ☐/ ☐/ ☐ Date Paid: ☐/ ☐/ ☐
Settled/Final: \$ ☐/ ☐/ ☐ 2) \$ ☐/ ☐/ ☐

Enforcement Comments: 1: ☐ (74)

2: ☐

Cite violations addressed by this action below -

VIOLATION DATA: New: ☐ Change: ☐ Delete: ☐

Agency: ☐ Type: ☐ Date (mdy) Determined: ☐/ ☐/ ☐ Class: ☐ Seq. (Data Entry) Number ☐

Priority: ☐ Branch: ☐ Person: ☐
Return to Compliance: ☐/ ☐/ ☐ -- Scheduled -- Actual ☐/ ☐/ ☐

Reg. Type: ☐ Reg. Description (30): ☐

Comment (72): ☐

Agency: ☐ Type: ☐ Date (mdy) Determined: ☐/ ☐/ ☐ Class: ☐ Seq. (Data Entry) Number ☐

Priority: ☐ Branch: ☐ Person: ☐
Return to Compliance: ☐/ ☐/ ☐ -- Scheduled -- Actual ☐/ ☐/ ☐

Reg. Type: ☐ Reg. Description (30): ☐

Comment (72): ☐

Agency: ☐ Type: ☐ Date (mdy) Determined: ☐/ ☐/ ☐ Class: ☐ Seq. (Data Entry) Number ☐

Priority: ☐ Branch: ☐ Person: ☐
Return to Compliance: ☐/ ☐/ ☐ -- Scheduled -- Actual ☐/ ☐/ ☐

Reg. Type: ☐ Reg. Description (30): ☐

Comment (72): ☐

Agency: ☐ Type: ☐ Date (mdy) Determined: ☐/ ☐/ ☐ Class: ☐ Seq. (Data Entry) Number ☐

Priority: ☐ Branch: ☐ Person: ☐
Return to Compliance: ☐/ ☐/ ☐ -- Scheduled -- Actual ☐/ ☐/ ☐

Reg. Type: ☐ Reg. Description (30): ☐

Comment (72): ☐

More violations for this enforcement action on other side ? Yes ☐ No ☐

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: US AIRWAYS
Location: 5020 Hangar Road, Charlotte, N.C. 28219
Mailing Address: P.O. Box 19368, Charlotte, N.C. 28219
EPA ID#: NCD 986 227 957 Phone Number: (704) 359-2018
Contact/Title: Tim Cooksey, Dennis Watson, Leigh Kiser
Initial Inspection Date: Nov. 30, 1999
Reinspection Date: Jan. 20, 2000
Reinspection Date for Compliance Order : July 24, 2000
Status: LOG Type of Inspection: CSE
Inspector(s): Joseph Parker - DENR Hazardous Waste Section,
Kristen Lippert - U.S. EPA Region IV, Waste Management Division

Present at Inspection: Dennis Watson - US AIRWAYS, Leigh Kiser -
US AIRWAYS Manager of Plant Maintenance

Comments made during the January 20, 2000 reinspection will be in bold type.

Comments made during the July 24, 2000 reinspection for Short Form Compliance Order with Administrative Penalty Docket #2000-081 will be in italics.

Type of Business: US AIRWAYS operates an aircraft maintenance facility for their fleet of airplanes and a ground support maintenance facility at this location.

Wastes Generated: The following hazardous waste streams have been generated since the last inspection:

D039 - Waste Combustible Liquid (petroleum naptha)
D006, D008 - Waste Compounds, Cleaning Liquid (monoethanolamine)
F003, F005 - Waste Paint Related Mat. (D001, D018, D035, D039, D040)
D001, U226 - Waste Aerosol Cans, Flammable
F002, F003, F005, D007 - Waste Flammable Liquids (acetone, toluene)
D001, D018 - Waste Flammable Liquids (jet fuel, kerosene)
F002, D018 - Hazardous Waste Solid (methylene chloride, benzene),
absorbent pads contaminated with Jet A Fuel
D006 - Hazardous Waste Solid (cadmium), NiCd batteries
D007, D035 - Hazardous Waste Solid (chromium, methyl ethyl ketone),
paint booth filters
D006, D007 - Hazardous Waste Solid (cadmium, chromium), waste dust
generated from sanding and painting operation.
D007 - Waste Chromic Acid
D002 - Waste Phosphoric Acid
D039 - Hazardous Waste Liq. (perchloroethylene, methylene chloride)
D005 - Hazardous Waste Solid (barium) - oxygen generators
D007, F002, F003 - Hazardous Waste Solid (methy. chloride, acetone)
D006, D007, D008 - Waste Flammable Solid (carbon dust, chromium)
D007 - Waste Cyanide Solution (chromic acid) - waste alodine

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957

Inspection Date: July 24, 2000

Manifests: Approved Transporters ? yes Approved TSDF ? yes
Filled Out Correctly ? yes Signed Copies ? yes *
LDR Notification Attached ? yes

The facility's 1999 and 1998 hazardous waste manifests were reviewed. During the inspection, no signed copies were provided for manifests #99047(07-16-99) and #98058(10-15-98). Both manifests were faxed by the TSD during the inspection. Violation corrected.

Transporters: Safety-Kleen Systems, Inc. - ILD 984 908 202
Southco - NCR 000 002 501
Four Seasons Environmental - NCD 991 277 732
Fisher Industrial Service - ALD 981 020 894
Ecoflo, Inc. - NCD 980 842 132
STAT, Inc. - NCD 980 799 142

TSD's: Safety-Kleen Systems, Inc. - NCD 079 060 059
Ecoflo, Inc. - NCD 980 842 132
Fisher Industrial Service, Inc. - ALD 981 020 894

Waste Minimization: Yes, documented in a written plan dated November 1, 1993. Plan includes the following items: 1) Haz. Waste reduction through substitution, efficient use, waste segregation between hazardous and non-hazardous, 2) Self inspections, 3) Employee environmental training.

Inspection Records:

Evidence that inspections are conducted: The facility's policy is to conduct weekly inspections on containers in their 90 day storage area.

Inspections on Storage Area: These required inspections are not being conducted on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. During the reinspection conducted on January 20, 2000, facility personnel provided copies of the original weekly inspections that were missing during the previous inspection. Mr. Watson indicated that these missing inspection records were completed, but the paperwork had been misplaced. All paperwork pertaining to their weekly inspections on their hazardous waste storage area is now submitted directly to Mr. Watson. In Compliance Jan. 20, 2000

Inspection on H.W. Tanks: N/A

Inspections on Ancillary Equipment: N/A

Contingency Plan:

On-Site ? Yes

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 2000

Any changes to facility/processes or Emergency Coordinator since last review? Yes, facility has made a few construction changes to the facility. None of these changes affected their hazardous waste generation.

Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documentation provided

Training Records:

Certified Training Documents Available? Yes

New Employees Since Last Inspection? Yes, all new employees are trained within one month of their hire date.

Evidence of Improper/Inadequate Training? Yes, during the inspection, there was evidence that 5 employees were not trained within their annual (365 day) training date. The employees were as follows: Scott Safford, Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259. During the reinspection conducted on January 20, 2000, facility personnel indicated that US AIRWAYS Management has been informed that their next training date for hazardous waste management must be within 365 days of the previous date. They have scheduled their next training for February 9, 2000. In Compliance Jan. 20, 2000.

Biennial Report Submitted? The facility could not produce a copy of their 1997 Biennial Report that was submitted in 1998. During the reinspection conducted on January 20, 2000, Mr. Watson and Ms. Kiser indicated that a copy of their 1997 Biennial Report has not been located. Ms. Kiser indicated that she has contacted the Raleigh Office and they do not have a copy of this report either. After discussing this situation with my immediate supervisor, Mr. Jesse Wells, and the Raleigh Office, Mr. Jim Edwards, I learned that the Raleigh Office, as well as USEPA Region IV do not have a copy of this report. Ms. Kiser indicated that the facility contact in 1998, Mr. Tim Cooksey sent the report in electronically. Again, the Raleigh Office does not have a copy of the computer disk that was suppose to be sent in with all electronic submittals of this report. US AIRWAYS must re-submit their 1997 Biennial Report to come into compliance with this violation.

During the reinspection conducted on July 24, 2000, US Airways personnel provided a copy of their 1997 Biennial Report. In Compliance July 24, 2000.

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Releases of hazardous waste were observed at the painting area in the Ground Support Equipment Building and the paint booth area located in the main hangar. During the reinspection conducted on January 20,

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957

Inspection Date: July 24, 2000

2000, both areas were observed without releases of hazardous waste on the containers. See the specific observations noted in the "Satellite Accumulation Areas" section below. In Compliance Jan. 20, 2000.

Internal Communications or Alarm Present? The facility has walkie-talkies, PA System, and an internal alarm with pull-down switches, infrared.

Portable Fire Extinguishers and/or Fire Control Equipment? The facility has fire extinguishers throughout the facility with fire hoses.

Spill Control Equipment: The facility has spill response carts that contain absorbent(pads, booms, loose), shovels, and a variety of personal protective equipment.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? The facility has automatic sprinklers, hoses, water

All Equipment/Alarms Tested and Maintained? Annually

All Personnel Handling HW have Access to Alarm/Device? Yes

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): The facility has nine location set up for the satellite accumulation of hazardous waste. These areas and the observations noted during the inspection are as follows:

1. Bay 3 Area

- | | |
|------------------|---|
| Waste Stream 6 - | 1-55 gallon container holding hazardous waste liquid (D001, D007, F001, F002, F003, F004, F005) - In Compliance. |
| Waste Stream 4 - | 1-55 gallon container holding hazardous waste solid (F002, D018) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed open, without the ring lock secured around the container. REPEAT VIOLATION.
During the reinspection conducted on July 24, 2000 the container was observed closed. New lids have been purchased by US Airways that automatically closes the container after use. In Compliance July 24, 2000. |

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 2000

- Waste Stream 1 - 1-55 gallon container holding hazardous waste liquid (D001, F001, F002) - noted as being open, without the small bung cap secured in the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.
- Waste Stream 5 - 1-55 gallon container holding hazardous waste solid (F002, F003, D007) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed open, without the ring lock secured around the container. REPEAT VIOLATION.
During the reinspection conducted on July 24, 2000 the container was observed closed. New lids have been purchased by US Airways that automatically closes the container after use. In Compliance July 24, 2000.
- Miscellaneous - 1-55 gallon container holding waste aerosol cans (D001, U226) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed open, with the ring lock missing around the container. The container's lid was observed on the container, with the edges of the lid not flush with the container. REPEAT VIOLATION.
During the reinspection conducted on July 24, 2000 the container was observed closed. New lids have been purchased by US Airways that automatically closes the container after use. In Compliance July 24, 2000.
- Miscellaneous - 1 plastic container with the top cut out was noted as holding spent fluorescent light tubes. Mr. Watson indicated that these tubes would be disposed of in the dumpster. Normally, when a large change out of tubes occur, they manifest them off site as a Universal Waste.

2. Paint Booth Area

- Right Side - 1-55 gallon container holding waste paint related material (acetone, toluene). The container was noted with open with the lid of

the funnel in the upright position. Additionally, releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of the container. During the reinspection conducted on January 20, 2000, this container was observed closed and without releases of hazardous waste on the funnel or on the container. In Compliance.

Left Side - 1-55 gallon container holding waste dust from the paint/sanding operation (D006, D007) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

3. Composite Area

- a. 1-55 gallon container holding hazardous waste solid (methyl ethyl ketone, chromium) consisting of waste paint filters. The container was noted as being open, without the ring lock secured around the top. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.
- b. 1-55 gallon container holding hazardous waste liquid (waste resin containers) - noted as being open, without the ring lock secured around the top. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

4. Slide Shop Area - 1-55 gallon container holding rags contaminated with methyl ethyl ketone. In Compliance.

5. Accessory Shop Area - 1-55 gallon container holding waste Ni./Cad. batteries (D006). In Compliance.

6. Ground Support Equipment

1st Area - (Paint Booth) 1-55 gallon container holding waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. During the reinspection conducted on January 20, 2000, this container was observed without releases of hazardous waste on the funnel that was placed in the container. Additionally, no releases of hazardous waste were noted on the container.** However, this container was observed open, with lid of the funnel in the upright position. REPEAT VIOLATION.

During the reinspection conducted on July 24, 2000 the container was observed closed. The lid of the funnel that was attached to the top of the container was observed closed. In Compliance July 24, 2000.

2nd Area -

- Waste Stream 1 - 1-55 gallon container holding waste jet fuel/kerosene - noted in compliance.
- Waste Stream 4 - 1-55 gallon container holding waste methylene chloride/benzene rags - noted without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.
- Miscellaneous - 1-55 gallon container holding waste aerosol cans - noted without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

7. Plant Maintenance

- a. 1-55 gallon container holding hazardous waste solid (D005-Barium) - oxygen generators - noted as being open without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.
- b. 1-55 gallon container used as a lab pack for methyl ethyl ketone and toluene bottles (D001, D005, D007, D008) - noted as being open without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.
- c. 1-35 gallon container holding waste flammable items (canisters of pepper spray) - noted as being open without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

Satellite Containers:

Closed? No, 13 containers noted as holding hazardous waste were observed open during the inspection. During the reinspection conducted on January 20, 2000, four containers holding hazardous waste were observed open. Three containers located in Bay 3 were observed open and one container at the Ground Support Equipment

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957

Inspection Date: July 24, 2000

Paint Booth was observed open. Attached to this inspection report are two interoffice correspondence documenting US AIRWAYS acknowledgement of this violation. These documents are addressed to Mr. Larry Montford - Director, Base Maintenance and Mr. Dennis Jancart - Manager, Charlotte GSE. The document is signed by Ms. Leigh Kiser who holds the position of Manager, Plant Maintenance - Charlotte. REPEAT VIOLATION

During the reinspection conducted on July 24, 2000, all containers noted open during the reinspection conducted on Jan. 20, 2000 were observed closed. In Compliance July 24, 2000.

Labeled/Contents Identified? Yes

< 55 Gallons? Due to safety concerns, the facility has been given permission to stage more than 55 gallons of hazardous waste at one satellite accumulation point.

Storage Area(s): 1 Description: The facility's 90 day storage area is located on the west side of the main hangar building. During the inspection, 40-55 gallon containers were observed in storage. The facility has a limited amount of storage space available for their containers of hazardous waste. They have been forced to store containers outside their fenced in storage area. It will be extremely important that weekly inspections are conducted on these containers since they are not in a secured location. A recommendation will be made concerning this area.

Containers: Closed? yes Aisle Space? yes Labeled? yes
Dated? yes Evidence of Release? none observed
< 90 Days? yes Good Condition? yes

Other HW Units: (Applicable Regulations)

Description of Unit: 2 Used oil tanks : 1-1000 gallon tank located at the Ground Support Equipment Area and 1-500 gallon tank located at the main hangar. Both tanks were in compliance.

External Facility Condition: Good

Site Deficiencies: The following site deficiencies were noted during the inspection conducted on November 30, 1999. Observations made during the reinspection conducted on January 20, 2000 will be shown in bold type. Observations made during the reinspection conducted on July 24, 2000 will be shown in italics.

1. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174 , states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, it was noted that the facility was not performing these inspections on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. The facility must perform and document these inspections on containers stored in their 90 day storage area every seven days. During the reinspection, the facility provided copies of the original inspection forms for these dates. US AIRWAYS was found to be in compliance with this violation.

2. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

During the inspection, a review of the facility's training records indicated that five employees were not trained within their annual training date in 1999. The following employees were Mr. Scott Safford, Mr. Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259. Facility personnel indicated that their hazardous waste training session will be scheduled in the future to be in compliance with the 365 day requirement. US AIRWAYS was found to be in compliance with this violation.

3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.31, states that a facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, releases of waste paint related material were observed at two separate satellite accumulation areas. The first area, the Paint Booth Area located in the Hangar, 1-55 gallon container is used to hold waste paint related material (acetone, toluene). The releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of the container. The second area, Ground Support Equipment Area, 1-55 gallon container is used to hold waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. US AIRWAYS must ensure that these releases of hazardous waste are eliminated in the future. During the reinspection conducted on January 20, 2000, no releases of hazardous waste were observed containers located in the Paint Booth Area in the

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 2000

main hangar or the Ground Support Equipment - Paint Booth Area. US AIRWAYS was found to be in compliance with this violation.

4. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a), states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, thirteen satellite accumulation containers were noted as being open. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste. REPEAT VIOLATION. Observations made during the reinspection will be documented below. In Compliance July 24, 2000.

5. 40 CFR 262.40(a), states that a generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the inspection, the facility failed to produce a copy of their 1997 Hazardous Waste Biennial Report. US AIRWAYS must locate a copy of the document to come into compliance. REPEAT VIOLATION. Observations made during the reinspection will be documented below. In Compliance July 24, 2000.

Follow Up Inspection: *July 24, 2000*

Site Deficiencies: The following site deficiencies were noted during the reinspection conducted on January 20, 2000:

1. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a), states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the reinspection conducted on January 20, 2000, four satellite accumulation containers were observed open. The first area, Bay 3, was noted with three open 55 gallon containers. These containers were marked as holding hazardous waste. The second area, Ground Support Equipment Paint Booth, was noted with one open 55 gallon container. The container was observed open, with lid of the funnel in the upright position. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste. This is a repeat violation.

During the reinspection conducted on July 24, 2000, all containers noted during the previous reinspection were

Page Eleven - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957

Inspection Date: July 24, 2000

observed closed. The 3-55 gallon container noted in the Bay 3 area all had hinged lids that close automatically after use. The container in the Ground Support Equipment Paint Booth area was noted closed, with the lid of the attached funnel, in the closed position. In Compliance July 24, 2000.

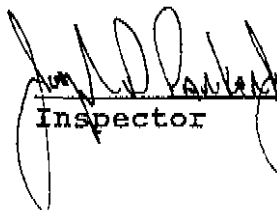
2. 40 CFR 262.40(a), states that a generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the reinspection conducted on January 20, 2000, facility personnel indicated that a copy of their 1997 Biennial Report has not been located. US AIRWAYS must re-submit their 1997 Biennial Report to come into compliance with this violation. This is a repeat violation.

During the reinspection conducted on July 24, 2000, facility personnel provided the State with a copy of their 1997 Biennial Report for hazardous waste generation. This document has been sent to the Raleigh Office. In Compliance July 24, 2000.

Comments:

US AIRWAYS has complied with the requirements of the Short Form Compliance Order with Administrative Penalty Docket # 2000-081. If there are any questions concerning this reinspection report, US Airways may contact me at the Mooresville Regional Office 704-663-1699.

 7-26-2000
Inspector (Date)

(CERTIFIED MAIL)
Facility Contact (Date)

May 11, 2000

Tim Cookey
P. O. Box 19268
5020 hanger Road
Charlotte, N.C. 28219



RE: US Airways, Inc. Compliance Order Doc. # 2000-081
NCD986227957

Dear Mr. Cookey:

On behalf of the Division of Waste Management, I acknowledge receipt of US Airways check number 1668424 in the amount of \$ 4338.00. This represents the amount in the Compliance Order. We will consider this matter closed.

If I can be of any assistance please call me at (919) 733-2178 ext 209.

Sincerely,

R. J. Edwards III
Administrative Officer
Division of Waste Management

CC: Attorney general
Central Files

FORM IC

OMB#: 2050-0024 Expires 08/30/90

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: US Airways
5020 HANGAR RD. CHARLOTTE, NC 28208

EPA ID NO: NICID 91816 2217 91517

U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
ICIDENTIFICATION AND
CERTIFICATION

Instructions: Please see the detailed instructions beginning on page 7 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each section is provided below.



Sec. I	Site name and location address. Check the box <input type="checkbox"/> in items A, B, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instructions page 7.		
A. EPA ID No. Same as label <input type="checkbox"/> or →	<u>NICID 91816 2217 91517</u>		
B. County Same as label <input type="checkbox"/> or →	<u>MECKLENBURG</u>		
C. Site/company name Same as label <input type="checkbox"/> or →	<u>US Airways</u>		
D. Has the site name associated with this EPA ID changed since 1987? <input checked="" type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No			
E. Street name and number. If not applicable, enter industrial park, building name, or other physical location description. Same as label <input type="checkbox"/> or →	<u>5020 HANGAR ROAD</u>		
F. City, town, village Same as label <input type="checkbox"/> or →	G. State Same as label <input type="checkbox"/> or →	H. Zip Code Same as label <input type="checkbox"/> or →	
<u>CHARLOTTE</u>	<u>NIC</u>	<u>28219-1111</u>	
Sec. II	Mailing address of site. Instructions page 7.		
A. Is the mailing address the same as the location address?	<input type="checkbox"/> 1 Yes (SKIP TO SEC. III)		<input checked="" type="checkbox"/> 2 No (CONTINUE TO BOX B)
B. Number and street name of mailing address	<u>P.O. Box 19368</u>		
C. City, town, village	D. State	E. Zip Code	
<u>CHARLOTTE</u>	<u>NIC</u>	<u>28219-1111</u>	
Sec. III	Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instructions page 7.		
A. Last Name	First name	M.I.	B. Title
<u>KISER</u>	<u>LEIGH</u>	<u>T.</u>	<u>MANAGER- PLANT MAINT.</u>
C. Telephone Number			Extension
<u>704 3519-12149</u>			<u>1111</u>
Sec. IV	"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3006 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations." Instructions page 8.		
A. Last Name	First name	M.I.	B. Title
<u>KISER</u>	<u>LEIGH</u>	<u>T.</u>	<u>MANAGER, PLANT MAINTENANCE</u>
C. Signature			D. Date of signature
<u>Leigh T. Kiser</u>			<u>02 11 00</u> Month Day Year

Post-It Fax Note	7671	Date	7-26-88	Pages	11
To	<u>Joe Parker</u>				
From	<u>Leigh Kiser</u>				
Co/Dept					
Phone #	<u>359-2249</u>				
Fax #	<u>663-10040</u>				
	<u>359-2246</u>				

Over →

Page 1 of 12

EPA ID NO. UNCLD 9 86 227 957

Sec. VI	On-site waste management status. Instructions page 10.	
A. Storage subject to RCRA permitting requirements		B. Treatment, disposal, or recycling subject to RCRA permitting requirements
		

Comments:

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: 115 Airways
5820 HANCOCK RD. CHARLOTTE, NC 28208EPA ID NO: WICD 9816 2127 9517U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12) <u>WASTE PAINT BOOTH FILTERS</u>					
B. EPA hazardous waste code (page 12) <u>D10107</u>			C. State hazardous waste code (page 13) _____		
D. SIC code (page 13) <u>4512</u>	E. Origin code (page 13) <u>11</u> System Type <u>(X)</u>	F. Source code (page 14) <u>W21</u>	G. Point of measurement (p. 14) <u>1</u>	H. Form code (page 14) <u>B3110</u>	I. RCRA-radioactive mixed (page 14) <u>2</u>
Sec. II A. Quantity generated in 1997 (page 15) <u>495.0</u>		B. UOM (page 15) <u>11</u> Density _____ □ 1 lbs/gal □ 2 kg	C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) □ 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <u>X</u> 2 No (SKIP TO SEC. III)		
ON-SITE PROCESS SYSTEM 1 On-site process system type (page 16) <u>(X)</u>			ON-SITE PROCESS SYSTEM 2 On-site process system type (page 16) <u>(X)</u>		
Quantity treated, disposed, or recycled on site in 1997 (page 16) _____			Quantity treated, disposed, or recycled on site in 1997 (page 16) _____		

Sec. III A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) <u>X</u> 1 Yes (CONTINUE TO BOX B) □ 2 No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>TXD 1017716033711</u>	C. System type shipped to (p. 17) <u>(X) 061</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>495.0</u>
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>(X)</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) _____
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>(X)</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) _____

Comments:

Page 4 of 16

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: US Airway
5020 HANGAR RD CHARLOTTE, NC 27208EPA ID NO: WICM 986 2127 9157U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12)

PETROLEUM NAPHTHA -

B. EPA hazardous waste code (page 12)
D039 D018
D0108 D040

C. State hazardous waste code (page 13)

D. SIC code (page 13)

4512E. Origin code (page 13) System Type
1
1

F. Source code (page 14)

A04

G. Point of measurement (p. 14)

1

H. Form code (page 14)

3211

I. RCRA-radioactive mixed (page 14)

2

Sec. II A. Quantity generated in 1997 (page 15)

109760B. UOM 1

(page 15)

Density

1 lbs/gal 2 sg

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15)

☐ 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type (page 16)

1

Quantity treated, disposed, or recycled on site in 1997 (page 16)

109760

ON-SITE PROCESS SYSTEM 2

On-site process system type (page 16)

1

Quantity treated, disposed, or recycled on site in 1997 (page 16)

109760Sec. III A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17)
☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (FORM IS COMPLETE)

Site 1 B. EPA ID No. of facility waste was shipped to (page 17)

WICM 079 060 059

C. System type shipped to (p. 17)

141

D. Off-site availability code (page 17)

1

E. Total quantity shipped in 1997 (page 17)

109760

Site 2 B. EPA ID No. of facility waste was shipped to (page 17)

1

C. System type shipped to (p. 17)

1

D. Off-site availability code (page 17)

1

E. Total quantity shipped in 1997 (page 17)

1

Site 3 B. EPA ID No. of facility waste was shipped to (page 17)

1

C. System type shipped to (p. 17)

1

D. Off-site availability code (page 17)

1

E. Total quantity shipped in 1997 (page 17)

1

Comments:

Page 6 of 16

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: 15 ABUEBUS
5020 HANCOCK RD CHARLOTTE NC 28268EPA ID NO: WICID 9816 2217 9517U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I	A. Waste description (page 12) <u>ABUEBUS BRAKE SOLUTIONS - PARTS CLEANERS</u>				
B. EPA hazardous waste code (page 12) <u>D1039 D1016</u> <u>D1040</u>		C. State hazardous waste code (page 13) _____			
D. SIC code (page 13) <u>4512</u>	E. Origin code (page 13) System Type <u>1</u> <u>1</u>	F. Source code (page 14) <u>107</u>	G. Point of measurement (p. 14) <u>1</u>	H. Form code (page 14) <u>1202</u>	I. RCRA-radioactive mixed (page 14) <u>2</u>
Sec. II	A. Quantity generated in 1997 (page 15) <u>559.0</u>		B. UOM (page 15) <u>1</u> Density _____ □ 1 lbs/gal □ 2 sg		
C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) □ 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) □ 2 No (SKIP TO SEC. III)					
ON-SITE PROCESS SYSTEM 1			ON-SITE PROCESS SYSTEM 2		
On-site process system type (page 16) <u>1</u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) _____		On-site process system type (page 16) <u>1</u>	
		Quantity treated, disposed, or recycled on site in 1997 (page 16) _____			
Sec. III	A. Was any of this waste shipped on site in 1997 for treatment, disposal, or recycling? (page 17) □ 1 Yes (CONTINUE TO BOX B) □ 2 No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>SCD 1077 995 4818</u>	C. System type shipped to (p. 17) <u>141</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>559.0</u>	
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>1</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) _____	
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>1</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) _____	
Comments:					

Page 8 of 40

Page 9 of 14

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: US Air Force
5000 HANCOCK RD CHARLOTTE, NC 27208EPA ID NO: WICID 9816 227 9517U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I	A. Waste description (page 12) WASTE FLAMMABLE ABSORBENT MATERIALS, BENZENE METHYLENE CHLORIDE					
B. EPA hazardous waste code (page 12) <u>F00102</u> <u>D01118</u>			C. State hazardous waste code (page 13) _____			
D. SIC code (page 13) <u>45112</u>	E. Origin code (page 13) <u>11</u> System Type <u>(M)</u>	F. Source code (page 14) <u>A153</u>	G. Point of measurement (p. 14) <u>1</u>	H. Form code (page 14) <u>B1310</u>	I. RCRA-radioactive mixed (page 14) <u>2</u>	

Sec. II	A. Quantity generated in 1997 (page 15) <u>306000</u>		B. UOM (page 15) <u>1</u> Density _____ = 1 lbs/gal = 2.5g	C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) = 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <u>X</u> 2 No (SKIP TO SEC. III)	
ON-SITE PROCESS SYSTEM 1			ON-SITE PROCESS SYSTEM 2		
On-site process system type (page 16) <u>(M)</u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) _____		On-site process system type (page 16) <u>(M)</u>	

Sec. III	A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) <u>X</u> 1 Yes (CONTINUE TO BOX B) = 2 No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>WICID 980842 1130</u>	C. System type shipped to (p. 17) <u>1068</u> <u>061</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>306000</u>	
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>(M)</u>	D. Off-site availability code (page 17) _____	E. Total quantity shipped in 1997 (page 17) _____	
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) _____	C. System type shipped to (p. 17) <u>(M)</u>	D. Off-site availability code (page 17) _____	E. Total quantity shipped in 1997 (page 17) _____	

Comments:

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: US Airways
5020 HAWKAR RD CHARLOTTE NC 29268EPA ID NO: WIC01 98.0 2.2.7 9.5.7U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12)

PAINT STRIPPING WASTE - SOLID - ACETONE, METHYLENE CHLORIDE

B. EPA hazardous waste code (page 12)
F10.0.2 F10.0.3
D0.0.7

C. State hazardous waste code (page 13)

D. SIC code (page 13)

4512E. Origin code (page 13) System Type
LI
MIF. Source code (page 14) -
11011

G. Point of measurement (p. 14)

LI

H. Form code (page 14)

13209

I. RCRA-radioactive mixed (page 14)

2

Sec. II A. Quantity generated in 1997 (page 15)

2000.0

B. UOM (page 15)

LIDensity 1.1
= 1 lb/gal = 2 kg

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15)

☐ 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type (page 15)

MI

Quantity treated, disposed, or recycled on site in 1997 (page 15)

2000.0

ON-SITE PROCESS SYSTEM 2

On-site process system type (page 15)

MI

Quantity treated, disposed, or recycled on site in 1997 (page 15)

2000.0Sec. III A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17)
☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (FORM IS COMPLETE)

Site 1 B. EPA ID No. of facility waste was shipped to (page 17)

WIC01 98.0 8.4.2 1.3.2C. System type shipped to (p. 17)
MI 1.4.1

D. Off-site availability code (page 17)

1

E. Total quantity shipped in 1997 (page 17)

2000.0

Site 2 B. EPA ID No. of facility waste was shipped to (page 17)

MI 1.4.1C. System type shipped to (p. 17)
MI 1.4.1

D. Off-site availability code (page 17)

1

E. Total quantity shipped in 1997 (page 17)

2000.0

Site 3 B. EPA ID No. of facility waste was shipped to (page 17)

MI 1.4.1C. System type shipped to (p. 17)
MI 1.4.1

D. Off-site availability code (page 17)

1

E. Total quantity shipped in 1997 (page 17)

2000.0

Comments:

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: US AIRCRAFT
5920 HANGAR RD CHARLOTTE, NC 27208EPA ID NO: NCID 98018421132U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I	A. Waste description (page 12) FLAMMABLE WASTE AIRCRAFT FUEL					
B. EPA hazardous waste code (page 12) F001, F002 D001			C. State hazardous waste code (page 13) _____			
D. SIC code (page 13) 4512		E. Origin code (page 13) System Type 1 1111		F. Source code (page 14) 159		
G. Point of measurement (p. 14) 1		H. Form code (page 14) 1206		I. RCRA-radioactive mixed (page 14) 2		
Sec. II	A. Quantity generated in 1997 (page 15) 6400.0		B. UOM (page 15) 1 Density _____ 1 gal 2 sq		C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) 2 No (SKIP TO SEC. III)	
ON-SITE PROCESS SYSTEM 1			ON-SITE PROCESS SYSTEM 2			
On-site process system type (page 16) 1111		Quantity treated, disposed, or recycled on site in 1997 (page 15) _____		On-site process system type Quantity treated, disposed, or recycled on site in 1997 (page 16) 1111 _____		
Sec. III	A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) 1 Yes (CONTINUE TO BOX 3) 2 No (FORM IS COMPLETE)					
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) NCID 98018421132		C. System type shipped to (p. 17) 1001		D. Off-site availability code (page 17) 1	
E. Total quantity shipped in 1997 (page 17) 6400.0						
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) _____		C. System type shipped to (p. 17) 1111		D. Off-site availability code (page 17) 1	
E. Total quantity shipped in 1997 (page 17) _____						
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) _____		C. System type shipped to (p. 17) 1111		D. Off-site availability code (page 17) 1	
E. Total quantity shipped in 1997 (page 17) _____						
Comments:						

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME:

US AIRWAYS
5630 HANGAR RD CHARLOTTE, NC 27208

EPA ID NO:

WICD 9816 227 1957U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I	A. Waste description (page 12) WASTE PHOSPHORIC ACID RINSE				
B. EPA hazardous waste code (page 12) <u>D01012</u>		C. State hazardous waste code (page 13) <u> </u>			
D. SIC code (page 13) <u>4511</u>	E. Origin code (page 13) <u>1</u> System Type <u> </u>	F. Source code (page 14) <u>1214</u>	G. Point of measurement (p. 14) <u>1</u>	H. Form code (page 14) <u>111015</u>	
I. RCRA-radioactive mixed (page 14) <u>2</u>					
Sec. II	A. Quantity generated in 1997 (page 15) <u>26000</u>		B. UOM (page 15) <u>1</u> Density <u> </u> <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg		
C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/PCNT? (page 16) <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input type="checkbox"/> 2 No (SKIP TO SEC. III)					
ON-SITE PROCESS SYSTEM 1			ON-SITE PROCESS SYSTEM 2		
On-site process system type (page 16) <u>1</u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) <u> </u>			
On-site process system type (page 16) <u>1</u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) <u> </u>			
Sec. III	A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX 5) <input type="checkbox"/> 2 No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>WICD 9810 842 132</u>	C. System type shipped to (p. 17) <u>1141</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>26000</u>	
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) <u> </u>	C. System type shipped to (p. 17) <u> </u>	D. Off-site availability code (page 17) <u> </u>	E. Total quantity shipped in 1997 (page 17) <u> </u>	
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) <u> </u>	C. System type shipped to (p. 17) <u> </u>	D. Off-site availability code (page 17) <u> </u>	E. Total quantity shipped in 1997 (page 17) <u> </u>	
Comments:					

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: US AIRCRAFT
5020 HANCOCK RD CHARLOTTE NC 28208EPA ID NO: NCID 9816 2127 9157U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I	A. Waste description (page 12) <u>NICKEL CADMIUM BATTERIES</u>				
B. EPA hazardous waste code (page 12) <u>D0016</u>			C. State hazardous waste code (page 13) <u></u>		
D. SIC code (page 13) <u>4512</u>	E. Origin code (page 13) <u>1</u> System Type <u>1</u>	F. Source code (page 14) <u>1515</u>	G. Point of measurement (p. 14) <u>1</u>	H. Form code (page 14) <u>1309</u>	I. RCRA-radioactive mixed (page 14) <u>67</u>
Sec. II	A. Quantity generated in 1997 (page 15) <u>500.0</u>		B. UCM (page 15) <u>1</u> Density <u>1.1</u> = 1 lb/gal = 2 kg		C. Did this site do any of the following to this waste: treat on site, store on site, recycle on site, or discharge to a sewer/POTW? (page 15) = 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) = 2 No (SKIP TO SEC. III)
ON-SITE PROCESS SYSTEM 1			ON-SITE PROCESS SYSTEM 2		
On-site process system type (page 16) <u>1</u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) <u></u>		On-site process system type (page 16) <u>1</u>	
Quantity treated, disposed, or recycled on site in 1997 (page 16) <u></u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) <u></u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) <u></u>	
Sec. III	A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) = 1 Yes (CONTINUE TO BOX B) = 2 No, FORM IS COMPLETE				
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>NCID 9816 342 132</u>	C. System type shipped to (p. 17) <u>141</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>500.0</u>	
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) <u></u>	C. System type shipped to (p. 17) <u>1</u>	D. Off-site availability code (page 17) <u></u>	E. Total quantity shipped in 1997 (page 17) <u></u>	
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) <u></u>	C. System type shipped to (p. 17) <u>1</u>	D. Off-site availability code (page 17) <u></u>	E. Total quantity shipped in 1997 (page 17) <u></u>	
Comments:					

FORM GM

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME:

US Air Force
5020 HANGAR RD CHARLOTTE NC 28208

EPA ID NO:

WICD 9816 2127 9517

U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I	A. Waste description (page 12) LAB PACK				
B. EPA hazardous waste code (page 12) D10.01			C. State hazardous waste code (page 13)		
D. SIC code (page 13) 15112	E. Origin code (page 13) System Type 1111	F. Source code (page 14) 1114	G. Point of measurement (p. 14) 11	H. Form code (page 14) 1003	I. RCRA-radioactive mixed (page 14) 2
Sec. II	A. Quantity generated in 1997 (page 15) 200.0		B. UOM (page 15) Density 1 lbs/gal 2 kg		C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) 2 No (SKIP TO SEC. III)
ON-SITE PROCESS SYSTEM 1			ON-SITE PROCESS SYSTEM 2		
On-site process system type (page 16) 1111		Quantity treated, disposed, or recycled on site in 1997 (page 16)		On-site process system type (page 16) Quantity treated, disposed, or recycled on site in 1997 (page 16)	
Sec. III	A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) 1 Yes (CONTINUE TO BOX B) 2 No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) WICD 9816 842 132	C. System type shipped to (p. 17) 1114	D. Off-site availability code (page 17) 11	E. Total quantity shipped in 1997 (page 17) 200.0	
Site 2	B. EPA ID No. of facility waste was shipped to (page 17)	C. System type shipped to (p. 17)	D. Off-site availability code (page 17)	E. Total quantity shipped in 1997 (page 17)	
Site 3	B. EPA ID No. of facility waste was shipped to (page 17)	C. System type shipped to (p. 17)	D. Off-site availability code (page 17)	E. Total quantity shipped in 1997 (page 17)	
Comments:					



NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

March 28, 2000

JAMES B. HUNT JR.
GOVERNOR

SHORT FORM COMPLIANCE ORDER
WITH ADMINISTRATIVE PENALTY
DOCKET # 2000-081

BILL HOLMAN
SECRETARY

Mr. Tim Coockey
Post Office Box 19268
5020 Hangar Road
Charlotte, North Carolina 28219

WILLIAM L. MEYER
DIRECTOR

Re: US Airways, Inc.
NCD 986 227 957



Dear Mr. Coockey:

On December 18, 1980, the State of North Carolina, Waste Management Division (the "Division") was authorized to operate the State RCRA hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (the "Act"), and the rules codified at 15A NCAC 13A (the "Rules"). William L. Meyer, Director, has been delegated the authority to implement the Act and Rules. Based on an on-site Compliance Schedule Evaluation (CSE) on January 20, 2000, Mr. Parker returned to the facility for a reinspection to determine if the facility had complied with NOV Docket # 2000-037. It has been determined that US Airways, Inc. ("US Airways") was still in violation of certain requirements of the Act and Rules as set forth below.

1. US Airways is a corporation registered to conduct business in North Carolina. US Airways generates hazardous waste as defined in N.C.G.S. 130A-290(8) and 15A NCAC 13A .0102, in Charlotte, Mecklenburg, North Carolina. US Airways is a person as defined in N.C.G.S. 130A-290(22) and 15A NCAC 13A .0102.
2. 40 CFR Part 262, adopted by reference at 15A NCAC 13A .0107, contains standards and requirements applicable to generators of hazardous waste.
3. US Airways is listed with the Division as a large quantity generator. A large quantity generator is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the



1646 MAIL SERVICE CENTER, RALEIGH, NORTH CAROLINA 27699-1646
401 OBERLIN ROAD, SUITE 150, RALEIGH, NC 27605
PHONE 919-733-4986 FAX 919-715-3605

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requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and 40 CFR 268.7(a)(4).

4. US Airways is an airline company that operates a ground support and aircraft maintenance shop for its fleet of airplanes .
5. US Airways has nine (9) satellite accumulation areas, one (1) less than ninety (90) day storage area and two (2) used oil tank areas .
6. On November 30, 1999, Mr. Joe Parker, Waste Management Specialist with this Division, performed a Compliance Evaluation Inspection (CEI) at US Airways after which a Ticket Notice of Violation (NOV) , Docket # 2000-037 was issued. On January 20, 2000, Mr. Parker returned to the facility for a CSE to determine if the previous violations had been corrected. The facility was found to be still in violation of certain requirements contained in 40 CFR 262, adopted by reference at 15A NCAC 13A .0107. Specifically:
 - a. 40 CFR 262.34(c)(1)(i):
 - i. 40 CFR 262.34(c)(1)(i), adopted by reference at 15A NCAC 13A .0107, states that a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 261.33(e) 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 interim status and without complying with paragraph 40 CFR 262.34(a) of this section provided he complies with Sections 265.171, 265.172 and 265.173(a) of this chapter and marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the container. 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0110, states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
 - ii. US Airways violated 40 CFR 262.34(c)(1)(i) in that it did not keep three (3) hazardous waste 55-gallon satellite accumulation containers in Bay 3 and one (1) hazardous waste 55-gallon container in the Ground Support Equipment Paint Booth area closed. Two (2) of the

containers in Bay 3 did not have the ring lock secured around the containers and the third container had a missing ring lock prohibiting the lid from being flush with the edges of the lid. The container in the Ground Support Equipment Paint Booth area was open with a funnel inserted in its top. The funnel's lid was in the upright position.

b. 40 CFR 262.41(a):

- i. 40 CFR 262.41(a) adopted by reference as adopted by reference at 15A NCAC 13A .0107, states a generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the Regional Administrator by March 1 of each even numbered year.
- ii. US Airways violated 40 CFR 262.41(a) in that it failed to prepare and submit its 1997 hazardous waste biennial report for hazardous waste shipped off-site within the United States.

7. N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$25,000.00 per day for each violation of the hazardous waste provisions of the Act, rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty which include the degree and extent of the harm caused by the violation and the cost of rectifying the damage. 15A NCAC 13B .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors that include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.
8. After careful consideration of each of the above factors, penalties are assessed as follows: a. \$3,438.00; and b. \$900.00. Accordingly, a total penalty is imposed in the amount of \$4,338.00.
9. Please be advised that the Department of Environment and Natural Resources has implemented a Department-wide policy to release

notification of all penalties that have been assessed against companies to the media on a monthly basis. Therefore, the name of your company, a list of violations cited and the penalty amount will be released to the media.

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, US Airways is hereby ordered to take the following actions:

10. Within sixty (60) days submit the amount of the administrative penalty, by check or money order, payable to the Division and mailed to Jill E. Burton, Acting Section Chief, Hazardous Waste Section, Division of Waste Management, 401 Oberlin Road Suite 150, Raleigh, North Carolina 27605.
11. US Airways shall immediately, unless otherwise indicated, take the following actions to correct all violations as stated in this Short Form Compliance Order with Administrative Penalty (Order) and otherwise be in compliance with the requirements of 40 CFR 262, adopted by reference at 15A NCAC 13A .0107:
 - a. Comply with 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107 and 15A NCAC 13A .0110(i). If hazardous waste is being stored on site, US Airways shall comply with the requirements of Subpart I of 40 CFR Part 265. Specifically:
 - i. US Airways shall ensure that all containers holding hazardous waste are closed, except when it is necessary to add or remove waste as required by 40 CFR 265.173(a).
 - b. Comply with 40 CFR 262.41(a), adopted by reference at 15A NCAC 13A .0107. US Airways shall submit its 1997 hazardous waste biennial report.
12. If the requirements above are not met, additional enforcement action including injunctive relief may be obtained for continued violations of the hazardous waste law or regulations.

NOTICE OF RIGHT TO APPEAL

13. US Airways has the right to an appeal to contest any matter of law, material fact, requirement, or penalty set forth in this Order. To appeal this Order, US Airways must file a written petition for a contested case hearing with the Office of Administrative Hearings, P.O. Drawer 27447, Raleigh, North Carolina 27611-7447, within 30 days of the receipt of the Order. The telephone is number (919) 733-0926. For purposes of computing the time limit for filing a petition for a contested case hearing, the Order will be deemed received on the date it is received by US Airways's registered agent. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to Daniel F. McLawhorn, Process Agent, Department of Environment and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27604.
14. The petition for a contested case hearing must be in accordance with N.C. Gen. Stat. 150B-23(a), and must state facts tending to establish that the Division has deprived the petitioner of property, has ordered the petitioner to pay a fine or civil penalty, or has otherwise substantially prejudiced the petitioner's rights and that the Division:
 - a. exceeded its authority or jurisdiction;
 - b. acted erroneously;
 - c. failed to use proper procedure;
 - d. acted arbitrarily or capriciously; or
 - e. failed to act as required by law or rule.
15. The petition must be signed by you or your representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings. If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

16. If you desire to schedule an informal conference to discuss the Order, please contact Helen Cotton (919) 733-2178 extension 216.

Respectfully,



William L. Meyer, Director
Division of Waste Management

cc:	Central File	Joe Parker	Doug Holyfield
	Jesse Wells	Kathleen Waylett	Kris Lippert, EPA Region 4
	Mecklenburg County Health Director		Susan Love
rc:	Linda Culpepper	Doug Roberts	Helen Cotton

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE YOU OF THE NEED TO FILE A WRITTEN PETITION FOR A CONTESTED CASE HEARING WITH THE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 30 DAYS OF RECEIPT BY US AIRWAYS' REGISTERED AGENT OF THE ORDER IF A HEARING IS REQUESTED.

By: William L. Meyer

William L. Meyer, Director
Division of Waste Management

Date: 3/29/00

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Order to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U. S. Mail, First Class (certified mail, return receipt requested, postage prepaid) in an envelope addressed to:

C. T. Corporation System
Registered Agent for US Airways
225 Hillsborough Street
Raleigh, North Carolina 27603

Dated this 28th day of March, 2000.

A handwritten signature in cursive script, reading "William L. Meyer", written over a horizontal line.

William L. Meyer, Director
Division of Waste Management

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE
(Use Separate Sheet for Each Violation)

Name/ID: US Airways/NCD 986 227 957

Regulation Violated: 40 CFR 262.34(c)(1)(i), adopted by reference at 15A NCAC 13A .0107, referencing 265.173(a), adopted by reference at 15A NCAC 13A .0110.

Part I. Degree or Extent of Harm (actual or potential)

1. Quantity of waste involved 4- 55-gallon containers
2. Toxicity of waste involved D001, D007, F001, F002, F003, F004, F005
3. Is human life or health potentially threatened? yes ☒ no ☐
Distance to residences ~ 2 miles east of the facility
Number of people involved 1500 employees
Media for exposure: air ☒ groundwater ☐ surface water ☐ direct contact ☒
4. Are other organisms potentially threatened? yes ☐ no ☒
Media for exposure: air ☒ ground water ☐ surface water ☐ direct contact ☒
5. Are any environmental media potentially threatened? yes ☒ no ☐
air ☒ groundwater ☐ surface water ☐ soil ☐
6. Is the regulatory program adversely affected? yes ☒ no ☐

Harm Cell: Major ☒ Moderate ☐ Minor ☐

Remarks: US Airways stored 3-55-gallon containers holding hazardous waste that were not maintained closed in the Bay 3 Area and one (1) hazardous waste 55-gallon container in the Ground Support Equipment Paint Booth area.

Part II. Deviation from Regulations

1. Degree of noncompliance with overall regulations:
substantial ☒ significant ☐ in compliance except for cited violation ☐

Deviation cell: Major ☒ Moderate ☐ Minor ☐

Remarks: 40 CFR 262.34(c)(1)(i), referencing 40 CFR 265.173(a) requires containers of hazardous waste to be kept closed during storage.

MATRIX CELL RANGE:	<u>\$ 1,000.00</u> to <u>\$ 5,500.00</u>
Penalty amount chosen:	<u>\$ 2,750.00</u>
Per Week Assessment:	\$ _____

Remarks : \$2,750.00 was chosen as the penalty amount due to the potential adverse effects US Airways is imposing on its employees and the environment by storing hazardous waste in containers that are not closed.

Part III. Penalty Adjustment (optional)

	Percentage change	Dollar Amount
1. Good faith efforts to comply/ lack of good faith:	_____	_____
2. Degree of willfulness/neglect:	_____	_____
3. History of noncompliance/ compliance:	<u>+25%</u>	<u>\$ 688.00</u>
4. Other unique factors:		
5. Adjusted initial penalty (amount from Part II)		<u>\$2,750.00</u>
6. Adjusted per-week penalty (amount from Part II)		_____
7. Number of weeks of violation		_____
8. Multi-week penalty (line 6 x line 7)		_____
9. Economic benefit of noncompliance (attach separate worksheet)		_____
10. Total (lines 5 + 8 + 9)		_____
11. Ability to pay adjustment		_____
12. Total Penalty Amount:		<u>\$3,438.00</u>
(may not exceed \$25,000 per day of violation)		

Remarks:

Compliance History : A 25% was added due to the fact that US Airways was cited for not keeping containers closed in an NOV dated 11/30/99.Docket #2000-037.

Signed: WLM

Date: 3/28/00

PENALTY COMPUTATION WORKSHEET-HAZARDOUS WASTE
(Use Separate Sheet for Each Violation)

Name/ID: US Airways/NCD 986 227 957

Regulation Violated: 40 CFR 262.41(a), adopted by reference at 15A NCAC 13A .0107

Part I. Degree or Extent of Harm (actual or potential)

1. Quantity of waste involved unknown
2. Toxicity of waste involved D001, D007, F001, F002, F003, F004, F005
3. Is human life or health potentially threatened? yes ☒ no ☐
Distance to residences ~ 2 miles east of the facility
Number of people involved 1500 employees
Media for exposure: air ☐ groundwater ☐ surface water ☐ direct contact ☐
4. Are other organisms potentially threatened? yes ☐ no ☐
Media for exposure: air ☐ ground water ☐ surface water ☐ direct contact ☐
5. Are any environmental media potentially threatened? yes ☐ no ☐
air ☐ groundwater ☐ surface water ☐ soil ☐
6. Is the regulatory program adversely affected? yes ☒ no ☐

Harm Cell: Major ☐ Moderate ☐ Minor ☒

Remarks: US Airways failed to submit its biennial report for 1997.

Part II. Deviation from Regulations

1. Degree of noncompliance with overall regulations:
substantial ☒ significant ☐ in compliance except for cited violation ☐

Deviation cell: Major ☒ Moderate ☐ Minor ☐

Remarks: 40 CFR 262.41(a) adopted by reference as adopted by reference at 15A NCAC 13A .0107 requires a generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States to prepare and submit a single copy of a Biennial Report by March 1 of each even numbered year.

MATRIX CELL RANGE:	<u>\$100.00 to \$660.00</u>
Penalty amount chosen:	<u>\$660.00</u>
Per Day Assessment:	

Remarks : \$660.00 was chosen as the penalty amount due to US Airways' failure to comply with the regulatory requirements.

Part III. Penalty Adjustment (optional)

	Percentage change	Dollar Amount
1. Good faith efforts to comply/ lack of good faith:	_____	_____
2. Degree of willfulness/neglect:	_____	_____
3. History of noncompliance/ compliance:	_____+50%	\$300.00
4. Other unique factors:		
5. Adjusted initial penalty (amount from Part II)		\$600.00
6. Adjusted per-day penalty (amount from Part II)		_____
7. Number of days of violation		_____
8. Multi-day penalty (line 6 x line 7)		_____
9. Economic benefit of noncompliance (attach separate worksheet)		
10. Total (lines 5 + 8 + 9)		_____
11. Ability to pay adjustment		_____
12. Total Penalty Amount:		\$900.00
(may not exceed \$25,000 per day of violation)		

Remarks: A 50% increase was added due to the compliance history. US Airways was cited for not submitting its 1997 Biennial Report in an NOV dated 11/30/99 Docket #2000-037.

Compliance History :

Signed: WFM

Date: 3/26/00

Jesse



NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
ASHEVILLE REGIONAL OFFICE

Division of Waste Management
Hazardous Waste Section

15

February 2, 2000

Memorandum

To: Doug Holyfield
Compliance Branch Head
Hazardous Waste Section

From: Jesse W. Wells *Jesse*
Western Compliance Supervisor

Subject: US Airways
5020 Hangar Road
P.O. Box 19368
Charlotte, Mecklenburg County, N.C.
NCD986227957

Attached for your review, comments and transmittal is an enforcement package for the subject facility. An initial CEI was conducted on 11/30/99 and Ticket NOV Docket Number 2000-037 was issued. A CSE inspection conducted 1/20/00 revealed that the facility was still in non-compliance with two items (open containers & failure to submit/locate 1997 biennial report). It is recommended that a short form order be drafted to address the RCRA violations identified.

Please advise should you have any questions.

FACILITY INFORMATION:	Submittal Information	Initial By- Date -	Corrected By- Date -
	EPA ID Number: <u>NC0986227957</u>	RCRA Comp. Section: Received: Entered/ Returned:	<u> </u> <u> </u> / <u> </u> / <u> </u> <u> </u> <u> </u> / <u> </u> / <u> </u> <u> </u> <u> </u> / <u> </u> / <u> </u>

Facility Name: US AIRWAYS City: CHARLOTTE

EVALUATION DATA: New: ☒ Change: ☒ Delete: ☐ (: Required)

Agency: S Date: 11/30/1999 Type: CSE Control Number: 17
Person: 01219 Reason: 011

Evaluation Comments:
(74) 1: Ticket NOV ISSUED - DOCKET # 2000-037
2: FACILITY NOT IN COMPLIANCE WITH NOV DOCKET # 2000-827

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) ☒ Date of determination:
- a SNC (SNY evaluation) ☒ Same as above eval.: - or -
or - no longer a SNC (SNN eval.) ☐ / /

VIOLATION DATA: New: ☒ Change: ☒ Delete: ☐

#1 Agency: S Type: GIPIT Date (mcy): 11/30/1999 Class:
Priority: Branch: 011 Person: 0219 Seq. (Data Entry) Number:
Return to Compliance: 011/016/010 011/210/010
Reg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.174
Comment (72): FACILITY NOT CONDUCTING WEEKLY INSPECTIONS IN COMPLIANCE

#2 Agency: S Type: GIPIT Date (mcy): 11/30/1999 Class:
Priority: Branch: 011 Person: 0219 Seq. (Data Entry) Number:
Return to Compliance: 011/016/010 011/210/010
Reg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c)
Comment (72): NO ANNUAL TRAINING CONDUCTED FOR 5 EMPLOYEES. IN COMPLIANCE

#3 Agency: S Type: GIPIT Date (mcy): 11/30/1999 Class:
Priority: Branch: 011 Person: 0219 Seq. (Data Entry) Number:
Return to Compliance: 011/016/010 011/210/010
Reg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.31
Comment (72): RELEASES OF HAZARDOUS WASTE ON 2 CONTAINERS IN COMPLIANCE

Continue violation data on Side B if necessary -

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: <input type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/> (---: Required)									
Agency: <input type="checkbox"/>		Type: <input type="checkbox"/>		Date: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>			Seq.# (Data Entry) <input type="checkbox"/>		
Person: <input type="checkbox"/>		Branch: <input type="checkbox"/>		Poll. Prev. Measures: <input type="checkbox"/>			<input type="checkbox"/>		
Penalty Data Proposed: \$ <input type="checkbox"/>				1) Payments: \$ <input type="checkbox"/>			Date Paid: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>		
Settled/Final: \$ <input type="checkbox"/>				2) \$ <input type="checkbox"/>			<input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>		
Enforcement Comments: 1: <u>TICKET NOT ISSUED - DOCKET # 2000-037</u> (74) 2: <u>FACILITY NOT IN COMPLIANCE WITH NOV DOCKET # 2000-037</u> Cite violations addressed by this action below -									
VIOLATION DATA: New: <input checked="" type="checkbox"/> Change: <input checked="" type="checkbox"/> Delete: <input type="checkbox"/>									
#1	Agency: <input checked="" type="checkbox"/>	Type: <input checked="" type="checkbox"/>	Date (mdy) Determined: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	Class: <input type="checkbox"/>			Seq. (Data Entry) Number <input type="checkbox"/>		
	Priority: <input type="checkbox"/>	Branch: <input type="checkbox"/>	Person: <input type="checkbox"/>	Return to Compliance: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>			Actual: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>		
	Reg. Type: <input checked="" type="checkbox"/>	Reg. Description (30): 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)							
	Comment (72): 13 satellite accumulation containers were observed open. REPEAT VIOLATION								
#5	Agency: <input checked="" type="checkbox"/>	Type: <input checked="" type="checkbox"/>	Date (mdy) Determined: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	Class: <input type="checkbox"/>			Seq. (Data Entry) Number <input type="checkbox"/>		
	Priority: <input type="checkbox"/>	Branch: <input type="checkbox"/>	Person: <input type="checkbox"/>	Return to Compliance: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>			Actual: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>		
	Reg. Type: <input checked="" type="checkbox"/>	Reg. Description (30): 40 CFR 262.40(a)							
	Comment (72): NO COPY OF THEIR MOST RECENT BIENNIAL REPORT. ONE 1/0. REPEAT VIOLATION								
#	Agency: <input type="checkbox"/>	Type: <input type="checkbox"/>	Date (mdy) Determined: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	Class: <input type="checkbox"/>			Seq. (Data Entry) Number <input type="checkbox"/>		
	Priority: <input type="checkbox"/>	Branch: <input type="checkbox"/>	Person: <input type="checkbox"/>	Return to Compliance: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>			Actual: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>		
	Reg. Type: <input type="checkbox"/>	Reg. Description (30):							
	Comment (72):								
#	Agency: <input type="checkbox"/>	Type: <input type="checkbox"/>	Date (mdy) Determined: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	Class: <input type="checkbox"/>			Seq. (Data Entry) Number <input type="checkbox"/>		
	Priority: <input type="checkbox"/>	Branch: <input type="checkbox"/>	Person: <input type="checkbox"/>	Return to Compliance: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>			Actual: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>		
	Reg. Type: <input type="checkbox"/>	Reg. Description (30):							
	Comment (72):								

Note violations for this enforcement action on other side ? Yes ☐ No ☐

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: <input type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/> (---: Required)			
Agency: <input type="text"/>	Type: <input type="text"/>	Date: <input type="text"/> / <input type="text"/> / <input type="text"/>	Seq.# (Data Entry) <input type="text"/>
Person: <input type="text"/>	Branch: <input type="text"/>	Poll. Prev. Measures: <input type="text"/>	<input type="text"/>
Penalty Data			
Proposed: \$ <input type="text"/>	1) Payments: \$ <input type="text"/>	Date Paid: <input type="text"/> / <input type="text"/> / <input type="text"/>	
Settled/Final: \$ <input type="text"/>	2) \$ <input type="text"/>	<input type="text"/> / <input type="text"/> / <input type="text"/>	
Enforcement Comments: 1: <u>Ticket NOV ISSUED - DOCKET # 2000-037</u> (74) 2: <u>Facility NOT IN COMPLIANCE WITH NOV DOCKET # 2000-037</u> Cite violations addressed by this action below -			
VIOLATION DATA: New: <input type="checkbox"/> Change: <input checked="" type="checkbox"/> Delete: <input type="checkbox"/>			
#1 Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. (Data Entry) Number <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- Actual ---	
Reg. Type: <input type="text"/>	Reg. Description (30): <u>40 CFR 262.34(c)(1)(i) & 40 CFR 265.173(a)</u>		
Comment (72): <u>13 satellite accumulation containers were observed open.</u> REPEAT VIOLATION			
#5 Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. (Data Entry) Number <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- Actual ---	
Reg. Type: <input type="text"/>	Reg. Description (30): <u>40 CFR 262.40(a)</u>		
Comment (72): <u>No copy of their most recent Biennial Report on file.</u> REPEAT VIOLATION			
# Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. (Data Entry) Number <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- Actual ---	
Reg. Type: <input type="text"/>	Reg. Description (30): <input type="text"/>		
Comment (72): <input type="text"/>			
# Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. (Data Entry) Number <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- Actual ---	
Reg. Type: <input type="text"/>	Reg. Description (30): <input type="text"/>		
Comment (72): <input type="text"/>			

More violations for this enforcement action on other side? Yes ☐ No ☐

FACILITY INFORMATION:	Submittal Information	Initial By -	Date -	Corrected By -	Date -
	EPA ID Number: <u>NCID986227957</u>	RCRA Comp. Section: ____	____	____/____/____	____
	Received: ____	____	____/____/____	____	____/____/____
	Entered/Returned: ____	____	____/____/____	____	____/____/____

(K)

Facility Name: US AIRWAYSCity: CHARLOTTEEVALUATION DATA: New: ☒ Change: ☒ Delete: ☐ (☐ : Required)

Agency: 15 Date: 11/13/1999 Type: CSE Control Number: 11111117
 Person: 01219 Reason: 011

Evaluation Comments:

(74) 1: Letter NOV ISSUED - DOCKET # 2000-0372: FACILITY NOT IN COMPLIANCE WITH NOV DOCKET # 2000-037

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) Date of determination:
 - a SNC (SNN evaluation) ☒ Same as above eval.: ☐ - or -
 or - no longer a SNC (SNN eval.) ☐ ☐ / ☐ / ☐

VIOLATION DATA: New: ☒ Change: ☒ Delete: ☐

#1 Agency: 15 Type: 6-PIT Date (mdy): 11/13/1999 Class: 1
 Priority: 1 Branch: 011 Person: 0219 Seq. (Data Entry) Number: 1111
 Return to Compliance: 011/016/010 -- Scheduled -- Actual: 011/210/010
 Reg. Type: 51R Reg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.174
 Comment (72): FACILITY NOT CONDUCTING WEEKLY INSPECTIONS IN COMPLIANCE

#2 Agency: 15 Type: 6-PIT Date (mdy): 11/13/1999 Class: 1
 Priority: 1 Branch: 011 Person: 0219 Seq. (Data Entry) Number: 1111
 Return to Compliance: 011/016/010 -- Scheduled -- Actual: 011/210/010
 Reg. Type: 51R Reg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c)
 Comment (72): NO ANNUAL TRAINING CONDUCTED FOR 5 EMPLOYEES. IN COMPLIANCE

#3 Agency: 15 Type: 6-PIT Date (mdy): 11/13/1999 Class: 1
 Priority: 1 Branch: 011 Person: 0219 Seq. (Data Entry) Number: 1111
 Return to Compliance: 011/016/010 -- Scheduled -- Actual: 011/210/010
 Reg. Type: 51R Reg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.31
 Comment (72): RELEASES OF HAZARDOUS WASTE ON 2 CONTAINERS IN COMPLIANCE

Continue violation date on Side B if necessary -

PENALTY COMPUTATION CHECKLIST

Facility Name/ID: US AIRWAYS NCD 986 227 957

ADDRESS: 5020 HANGAR ROAD, CHARLOTTE, N.C. 28219

1. Number of employees at the facility. 1500 employees
2. Number of residents in the area of the facility. UNKNOWN
3. Distance to residents. Approx. 2 miles (Airport Drive) - EAST OF FACILITY
4. Source of facility's potable water supply. MUNICIPAL
5. Source of potable water supply for residents and/or other industries in the area of the facility. MUNICIPAL
6. List all violations found at the facility:

1. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a) _____

2. 40 CFR 262.40(a) _____

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(OVER)

SPECIFIC VIOLATION(S)

- Regulation violated: 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)
1. Unit(s) involved. FOUR OPEN CONTAINERS OF HAZARDOUS WASTE
 2. Type of waste (waste code and constituents) F002, F003, F005, D001, D007, D018, D035, D139, D040, U226
 3. Quantity of waste 4-55 gallon CONTAINERS
 4. Describe area in which violation occurred. 3-55 gal. containers were NOTED IN THE BAY 3 AREA and 1-55 gallon container was noted in the PAINT Booth area of the Ground Support Area.
 5. Specifics of violation. THE THREE CONTAINERS NOTED IN THE BAY 3 AREA WERE OBSERVED WITH THE RINGLOCKS NOT SECURED and the container noted in GSE WAS OBSERVED WITH THE LID OF THE FUNNEL IN UPRIGHT POS.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) OBSERVATIONS OF CONTAINERS NOT PROPERLY CLOSED.
 7. Date violation occurred? INITIALLY NOV. 30, 1999 - REPEAT - JAN. 20, 2000
 8. Has facility been cited for this violation in past? yes ☒ no ☐
Date(s) of past violation? NOV. 30, 1999 - NOV DOCKET # 2000-037, JAN. 10, 1994 - NOV DOCKET # 94-074

- Regulation violated: 40 CFR 262.40 (a)
1. Unit(s) involved. 1998 BIENNIAL REPORT
 2. Type of waste (waste code and constituents) VARIOUS - INCLUDES D001, D002, D005, D006, D007, D008, D018, D039, F002, F003, F005, U226
 3. Quantity of waste UNKNOWN - ALL HAZ. WASTE GENERATED IN 1997
 4. Describe area in which violation occurred. THE FACILITY FAILED TO SUBMIT THEIR 1998 HAZARDOUS WASTE BIENNIAL REPORT. THE REPORT WOULD DOCUMENT THE QUANTITY OF HAZ. WASTE GENERATED IN 1997.
 5. Specifics of violation. DURING THE INSPECTION, NO COPY OF THE BIENNIAL REPORT COULD BE PRODUCED. NEITHER THE STATE OR USEPA REGION 2 HAD A COPY.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
 7. Date violation occurred? JAN. 20, 2000
 8. Has facility been cited for this violation in past? yes ☒ no ☐
Date(s) of past violation? NOV. 30, 1999 - NOV DOCKET # 2000-037

- Regulation violated: _____
1. Unit(s) involved. _____
 2. Type of waste (waste code and constituents) _____
 3. Quantity of waste _____
 4. Describe area in which violation occurred. _____
 5. Specifics of violation. _____
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) _____
 7. Date violation occurred? _____
 8. Has facility been cited for this violation in past? yes ☐ no ☐
Date(s) of past violation? _____

SPECIFIC VIOLATION(S)

- Regulation violated: 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)
1. Unit(s) involved. FOUR OPEN CONTAINERS OF HAZARDOUS WASTE
 2. Type of waste (waste code and constituents) F002, F003, F005, D001, D007, D018, D035, D039, D040, U226
 3. Quantity of waste 4-55 GALLON CONTAINERS
 4. Describe area in which violation occurred. 3-55 gal. CONTAINERS WERE NOTED IN THE BAY 3 AREA AND 1-55 GALLON CONTAINER WAS NOTED IN THE PAINT BOOTH AREA OF THE GROUND SUPPORT AREA.
 5. Specifics of violation. THE THREE CONTAINERS NOTED IN THE BAY 3 AREA WERE OBSERVED WITH THE RINGLOCKS NOT SECURED AND THE CONTAINER NOTED IN GSE WAS OBSERVED WITH THE LID OF THE DUMPER IN UPRIGHT POS.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.) OBSERVATIONS OF CONTAINERS NOT PROPERLY CLOSED.
 7. Date violation occurred? INITIALLY NOV. 30, 1999 - REPEAT - JAN. 20, 2000
 8. Has facility been cited for this violation in past? yes ☒ no
Date(s) of past violation? NOV. 30, 1999 - NOV DOCKET # 2000-037, JAN. 10, 1994 - NOV DOCKET # 94-074

- Regulation violated: 40 CFR 262.40 (a)
1. Unit(s) involved. 1998 BIENNIAL REPORT
 2. Type of waste (waste code and constituents) VARIOUS - INCLUDES D001, D002, D005, D006, D007, D008, D018, D039, F002, F003, F005, U226
 3. Quantity of waste UNKNOWN - ALL HAZ. WASTE GENERATED IN 1997
 4. Describe area in which violation occurred. THE FACILITY FAILED TO SUBMIT THEIR 1998 HAZARDOUS WASTE BIENNIAL REPORT. THE REPORT WOULD DOCUMENT THE QUANTITY OF HAZ. WASTE GENERATED IN 1997.
 5. Specifics of violation. DURING THE INSPECTION, NO COPY OF THE BIENNIAL REPORT COULD BE PRODUCED. NEITHER THE STATE OR USEPA REGIONAL OFFICE HAD A COPY.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
 7. Date violation occurred? JAN. 20, 2000
 8. Has facility been cited for this violation in past? yes ☒ no
Date(s) of past violation? NOV. 30, 1999 - NOV DOCKET # 2000-037

- Regulation violated:
1. Unit(s) involved.
 2. Type of waste (waste code and constituents)
 3. Quantity of waste
 4. Describe area in which violation occurred.
 5. Specifics of violation.
 6. Readily observable evidence indicating this violation may have impacted the environment (e.g. discolored soil, odors, etc.)
 7. Date violation occurred?
 8. Has facility been cited for this violation in past? yes ☐ no
Date(s) of past violation?

PENALTY COMPUTATION CHECKLIST

Facility Name/ID: US AIRWAYS NCD 986 227 957

ADDRESS: 5020 HANGAR ROAD, CHARLOTTE, N.C. 28219

1. Number of employees at the facility. 1500 employees
2. Number of residents in the area of the facility. UNKNOWN
3. Distance to residents. Approx. 2 miles (Airport Drive) - EAST of facility
4. Source of facility's potable water supply. Municipal
5. Source of potable water supply for residents and/or other industries in the area of the facility. Municipal
6. List all violations found at the facility:

1. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)

2. 40 CFR 262.40(a)

(OVER)

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: US AIRWAYS
Location: 5020 Hangar Road, Charlotte, N.C. 28219
Mailing Address: P.O. Box 19368, Charlotte, N.C. 28219
EPA ID#: NCD 986 227 957 Phone Number: (704) 359-2018
Contact/Title: Tim Cooksey, Dennis Watson, Leigh Kiser
Inspection Date: Jan. 20, 2000 Last Inspection: Nov. 30, 1999
Status: LOG Type of Inspection: CSE
Inspector(s): Joseph Parker - DENR Hazardous Waste Section
Present at Inspection: Dennis Watson - US AIRWAYS, Leigh Kiser -
US AIRWAYS Manager of Plant Maintenance

Reinspection comments will be in bold type

Type of Business: US AIRWAYS operates an aircraft maintenance facility for their fleet of airplanes and a ground support maintenance facility at this location.

Wastes Generated: The following hazardous waste streams have been generated since the last inspection:

D039 - Waste Combustible Liquid (petroleum naptha)
D006, D008 - Waste Compounds, Cleaning Liquid (monoethanolamine)
F003, F005 - Waste Paint Related Mat. (D001, D018, D035, D039, D040)
D001, U226 - Waste Aerosol Cans, Flammable
F002, F003, F005, D007 - Waste Flammable Liquids (acetone, toluene)
D001, D018 - Waste Flammable Liquids (jet fuel, kerosene)
F002, D018 - Hazardous Waste Solid (methylene chloride, benzene),
absorbent pads contaminated with Jet A Fuel
D006 - Hazardous Waste Solid (cadmium), NiCd batteries
D007, D035 - Hazardous Waste Solid (chromium, methyl ethyl ketone),
paint booth filters
D006, D007 - Hazardous Waste Solid (cadmium, chromium), waste dust
generated from sanding and painting operation.
D007 - Waste Chromic Acid
D002 - Waste Phosphoric Acid
D039 - Hazardous Waste Liq. (perchloroethylene, methylene chloride)
D005 - Hazardous Waste Solid (barium) - oxygen generators
D007, F002, F003 - Hazardous Waste Solid (methy. chloride, acetone)
D006, D007, D008 - Waste Flammable Solid (carbon dust, chromium)
D007 - Waste Cyanide Solution (chromic acid) - waste alodine

Manifests: Approved Transporters ? yes Approved TSDF ? yes
Filled Out Correctly ? yes Signed Copies ? yes *
LDR Notification Attached ? yes

The facility's 1999 and 1998 hazardous waste manifests were reviewed. During the inspection, no signed copies were provided for manifests #99047(07-16-99) and #98058(10-15-98). Both manifests were faxed by the TSD during the inspection. Violation corrected.

Page Two - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957

Inspection Date: Jan. 20, 2000

Transporters: Safety-Kleen Systems, Inc. - ILD 984 908 202
Southco - NCR 000 002 501
Four Seasons Environmental - NCD 991 277 732
Fisher Industrial Service - ALD 981 020 894
Ecoflo, Inc. - NCD 980 842 132
STAT, Inc. - NCD 980 799 142

TSD's: Safety-Kleen Systems, Inc. - NCD 079 060 059
Ecoflo, Inc. - NCD 980 842 132
Fisher Industrial Service, Inc. - ALD 981 020 894

Waste Minimization: Yes, documented in a written plan dated November 1, 1993. Plan includes the following items: 1) Haz. Waste reduction through substitution, efficient use, waste segregation between hazardous and non-hazardous, 2) Self inspections, 3) Employee environmental training

Inspection Records:

Evidence that inspections are conducted: The facility's policy is to conduct weekly inspections on containers in their 90 day storage area.

Inspections on Storage Area: These required inspections are not being conducted on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. During the reinspection conducted on January 20, 2000, facility personnel provided copies of the original weekly inspections that were missing during the previous inspection. Mr. Watson indicated that these missing inspection records were completed, but the paperwork had been misplaced. All paperwork pertaining to their weekly inspections on their hazardous waste storage area is now submitted directly to Mr. Watson. In Compliance

Inspection on H.W. Tanks: N/A

Inspections on Ancillary Equipment: N/A

Contingency Plan:

On-Site ? Yes

Any changes to facility/processes or Emergency Coordinator since last review? Yes, facility has made a few construction changes to the facility. None of these changes affected their hazardous waste generation.

Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documentation provided

Training Records:

Certified Training Documents Available? Yes

New Employees Since Last Inspection? Yes, all new employees are trained within one month of their hire date.

Page Three - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: Jan. 20, 2000

Evidence of Improper/Inadequate Training? Yes, during the inspection, there was evidence that 5 employees were not trained within their annual (365 day) training date. The employees were as follows: Scott Safford, Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259. During the reinspection conducted on January 20, 2000, facility personnel indicated that US AIRWAYS Management has been informed that their next training date for hazardous waste management must be within 365 days of the previous date. They have scheduled their next training for February 9, 2000. In Compliance.

Biennial Report Submitted? The facility could not produce a copy of their 1997 Biennial Report that was submitted in 1998. During the reinspection conducted on January 20, 2000, Mr. Watson and Ms. Kiser indicated that a copy of their 1997 Biennial Report has not been located. Ms. Kiser indicated that she has contacted the Raleigh Office and they do not have a copy of this report either. After discussing this situation with my immediate supervisor, Mr. Jesse Wells, and the Raleigh Office, Mr. Jim Edwards, I learned that the Raleigh Office, as well as USEPA Region IV do not have a copy of this report. Ms. Kiser indicated that the facility contact in 1998, Mr. Tim Cooksey sent the report in electronically. Again, the Raleigh Office does not have a copy of the computer disk that was suppose to be sent in with all electronic submittals of this report. US AIRWAYS must re-submit their 1997 Biennial Report to come into compliance with this violation.

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Releases of hazardous waste were observed at the painting area in the Ground Support Equipment Building and the paint booth area located in the main hangar. During the reinspection conducted on January 20, 2000, both areas were observed without releases of hazardous waste on the containers. See the specific observations noted in the "Satellite Accumulation Areas" section below. In Compliance.

Internal Communications or Alarm Present? The facility has walkie-talkies, PA System, and an internal alarm with pull-down switches, infrared.

Portable Fire Extinguishers and/or Fire Control Equipment? The facility has fire extinguishers throughout the facility with fire hoses.

Spill Control Equipment: The facility has spill response carts that contain absorbent(pads, booms, loose), shovels, and a variety of personal protective equipment.

Page Four - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: Jan. 20, 2000

Adequate Water Volume, Foam Equipment or Auto Sprinklers? The facility has automatic sprinklers, hoses, water

All Equipment/Alarms Tested and Maintained? Annually

All Personnel Handling HW have Access to Alarm/Device? Yes

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): The facility has nine location set up for the satellite accumulation of hazardous waste. These areas and the observations noted during the inspection are as follows:

1. Bay 3 Area

- Waste Stream 6 - 1-55 gallon container holding hazardous waste liquid (D001, D007, F001, F002, F003, F004, F005) - In Compliance.
- Waste Stream 4 - 1-55 gallon container holding hazardous waste solid (F002, D018) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed open, without the ring lock secured around the container. REPEAT VIOLATION.
- Waste Stream 1 - 1-55 gallon container holding hazardous waste liquid (D001, F001, F002) - noted as being open, without the small bung cap secured in the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.
- Waste Stream 5 - 1-55 gallon container holding hazardous waste solid (F002, F003, D007) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed open, without the ring lock secured around the container. REPEAT VIOLATION.
- Miscellaneous - 1-55 gallon container holding waste aerosol cans (D001, U226) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed open, with the ring lock missing around the container. The container's lid was observed on the container, with the edges of the lid not flush with the container. REPEAT VIOLATION.

Page Five - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957

Inspection Date: Jan. 20, 2000

Miscellaneous - 1 plastic container with the top cut out was noted as holding spent fluorescent light tubes. Mr. Watson indicated that these tubes would be disposed of in the dumpster. Normally, when a large change out of tubes occur, they manifest them off site as a Universal Waste.

2. Paint Booth Area

Right Side - 1-55 gallon container holding waste paint related material (acetone, toluene). The container was noted with open with the lid of the funnel in the upright position. Additionally, releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of the container. During the reinspection conducted on January 20, 2000, this container was observed closed and without releases of hazardous waste on the funnel or on the container. In Compliance.

Left Side - 1-55 gallon container holding waste dust from the paint/sanding operation (D006, D007) - noted as being open, without the ring lock secured. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

3. Composite Area

a. 1-55 gallon container holding hazardous waste solid (methyl ethyl ketone, chromium) consisting of waste paint filters. The container was noted as being open, without the ring lock secured around the top. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

b. 1-55 gallon container holding hazardous waste liquid (waste resin containers) - noted as being open, without the ring lock secured around the top. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

4. Slide Shop Area - 1-55 gallon container holding rags contaminated with methyl ethyl ketone. In Compliance.

5. Accessory Shop Area - 1-55 gallon container holding waste nickel/cadmium batteries (D006). In Compliance.

6. Ground Support Equipment

1st Area - (Paint Booth) 1-55 gallon container holding waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. During the reinspection conducted on January 20, 2000, this container was observed without releases of hazardous waste on the funnel that was placed in the container. Additionally, no releases of hazardous waste were noted on the container. ** However, this container was observed open, with lid of the funnel in the upright position. REPEAT VIOLATION.

2nd Area -

Waste Stream 1 - 1-55 gallon container holding waste jet fuel/kerosene - noted in compliance.

Waste Stream 4 - 1-55 gallon container holding waste methylene chloride/benzene rags - noted without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

Miscellaneous - 1-55 gallon container holding waste aerosol cans - noted without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

7. Plant Maintenance

a. 1-55 gallon container holding hazardous waste solid (D005-Barium) - oxygen generators - noted as being open without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

b. 1-55 gallon container used as a lab pack for methyl ethyl ketone and toluene bottles (D001, D005, D007, D008) - noted as being open without the ring lock secured around the top of the container. During the reinspection conducted on January 20, 2000, this container was observed closed. In Compliance.

c. 1-35 gallon container holding waste flammable items (canisters of pepper spray) - noted as being open without

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: Jan. 20, 2000

the ring lock secured around the top of the container.
During the reinspection conducted on January 20, 2000,
this container was observed closed. In Compliance.

Satellite Containers:

Closed? No, 13 containers noted as holding hazardous waste were observed open during the inspection. During the reinspection conducted on January 20, 2000, four containers holding hazardous waste were observed open. Three containers located in Bay 3 were observed open and one container at the Ground Support Equipment Paint Booth was observed open. Attached to this inspection report are two interoffice correspondence documenting US AIRWAYS acknowledgement of this violation. These documents are addressed to Mr. Larry Montford - Director, Base Maintenance and Mr. Dennis Jancart - Manager, Charlotte GSE. The document is signed by Ms. Leigh Kiser who holds the position of Manager, Plant Maintenance - Charlotte. REPEAT VIOLATION

Labeled/Contents Identified? Yes

< 55 Gallons? Due to safety concerns, the facility has been given permission to stage more than 55 gallons of hazardous waste at one satellite accumulation point.

Storage Area(s): 1 Description: The facility's 90 day storage area is located on the west side of the main hangar building. During the inspection, 40-55 gallon containers were observed in storage. The facility has a limited amount of storage space available for their containers of hazardous waste. They have been forced to store containers outside their fenced in storage area. It will be extremely important that weekly inspections are conducted on these containers since they are not in a secured location. A recommendation will be made concerning this area.

Containers: Closed? yes Aisle Space? yes Labeled? yes
Dated? yes Evidence of Release? none observed
< 90 Days? yes Good Condition? yes

Other HW Units: (Applicable Regulations)

Description of Unit: 2 Used oil tanks : 1-1000 gallon tank located at the Ground Support Equipment Area and 1-500 gallon tank located at the main hangar. Both tanks were in compliance.

External Facility Condition: Good

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: Jan. 20, 2000

Site Deficiencies: The following site deficiencies were noted during the inspection conducted on November 30, 1999. Observations made during the reinspection conducted on January 20, 2000 will be shown in bold type.

1. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174 , states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, it was noted that the facility was not performing these inspections on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. The facility must perform and document these inspections on containers stored in their 90 day storage area every seven days. During the reinspection, the facility provided copies of the original inspection forms for these dates. US AIRWAYS was found to be in compliance with this violation.

2. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

During the inspection, a review of the facility's training records indicated that five employees were not trained within their annual training date in 1999. The following employees were Mr. Scott Safford, Mr. Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259. Facility personnel indicated that their hazardous waste training session will be scheduled in the future to be in compliance with the 365 day requirement. US AIRWAYS was found to be in compliance with this violation.

3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.31, states that a facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, releases of waste paint related material were observed at two separate satellite accumulation areas. The first area, the Paint Booth Area located in the Hangar, 1-55 gallon container is used to hold waste paint related material (acetone, toluene). The releases of hazardous waste were observed on the funnel that was placed in

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: Jan. 20, 2000

the container, on the top of the container, and on the side of the container. The second area, Ground Support Equipment Area, 1-55 gallon container is used to hold waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. US AIRWAYS must ensure that these releases of hazardous waste are eliminated in the future. During the reinspection conducted on January 20, 2000, no releases of hazardous waste were observed containers located in the Paint Booth Area in the main hangar or the Ground Support Equipment - Paint Booth Area. US AIRWAYS was found to be in compliance with this violation.

4. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a), states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, thirteen satellite accumulation containers were noted as being open. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste. REPEAT VIOLATION. Observations made during the reinspection will be documented below.

5. 40 CFR 262.40(a), states that a generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the inspection, the facility failed to produce a copy of their 1997 Hazardous Waste Biennial Report. US AIRWAYS must locate a copy of the document to come into compliance. REPEAT VIOLATION. Observations made during the reinspection will be documented below.

Follow Up Inspection: January 20, 2000

Site Deficiencies: The following site deficiencies were noted during the reinspection conducted on January 20, 2000:

1. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a), states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the reinspection conducted on January 20, 2000, four satellite accumulation containers were observed open. The first area, Bay 3, was noted with three open 55 gallon containers. These containers were marked as holding hazardous waste. The second area, Ground Support Equipment Paint Booth, was noted with one open 55 gallon container. The container

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: Jan. 20, 2000

was observed open, with lid of the funnel in the upright position. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste. This is a repeat violation.

2. 40 CFR 262.40(a), states that a generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the reinspection conducted on January 20, 2000, facility personnel indicated that a copy of their 1997 Biennial Report has not been located. US AIRWAYS must re-submit their 1997 Biennial Report to come into compliance with this violation. This is a repeat violation.

Comments:

US AIRWAYS should address the repeat violations noted above as soon as possible. A copy of this reinspection report will be sent to the Raleigh Central Office for review in consideration of further enforcement actions.


Inspector

JAN. 24, 2000
(Date)

(CERTIFIED MAIL)
Facility Contact

(Date)



**Interoffice
Correspondence**

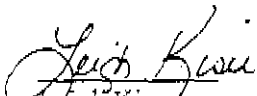
Date: December 20, 1999
To: Dennis Jancart - Manager, Charlotte GSE
From: Manager, Plant Maintenance - CLT
Subject: RCRA Violations

Attached is a copy of a recent state hazardous waste inspection of our charlotte facilities. Please note the highlighted items 3 and 4. All containers with funnels must use a hinged funnel that automatically closes. Secondly, open top drums in the satellite accumulation areas must have the rings attached to the drum at all times. When a waste is added to the drum, the ring must be removed and replaced when the top is closed.

Please review these items with your personnel as soon as possible. A follow up inspection is scheduled for January 6, 2000.

Please contact me if you have any questions, 359-2249.

Thank you for your assistance.


Leigh Kiser

LK/rw



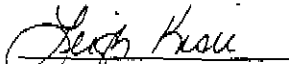
**Interoffice
Correspondence**

Date: December 20, 1999
To: Larry Montford - Director, Base Maintenance - CLT
From: Manager, Plant Maintenance - CLT
Subject: RCRA Violations

As a follow up to my earlier note, attached is a copy of recent state hazardous waste inspection of our Charlotte facilities. Please note the highlighted items 3 and 4. All containers with funnels must use a hanged funnel that automatically closes. Secondly, open top drums in the satellite accumulation areas must have the rings attached to the drums at all times. When a waste is added to the drum, the ring must be removed and replaced when the top is closed.

Please review these items with your personnel as soon as possible. A follow up inspection will be January 6, 2000.

Please contact me if you have any questions, 359-2249.


Leigh Kiser

LK/rw

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
MOORESVILLE REGIONAL OFFICE



Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

JAMES B. HUNT JR.
GOVERNOR

To: US AIRWAYS
5020 Hangar Road
Charlotte, N.C. 28219

Docket #: 2000 - 037
Insp. Date: Nov. 30, 1999
Facility Type: LQG

WAYNE MCDEVITT
SECRETARY

EPA ID#: NCD 986 227 957

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On November 30, 1999, Mr. Joseph Parker representing the North Carolina Hazardous Waste Section inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations was noted:

Citation

Specifics

1. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, it was noted that the facility was not performing these required inspections on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. The facility must perform and document these inspections on containers stored in their 90 day storage area every seven days.

2. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c)

Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

During the inspection, a review of the facility's training records indicated that five employees were not

trained within their annual training date in 1999. The following employees were Mr. Scott Safford, Mr. Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259.

3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.31

A facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, releases of waste paint related material were observed at two separate satellite accumulation areas. The first area, the Paint Booth Area located in the Hangar, 1-55 gallon container is used to hold waste paint related material (acetone, toluene). The releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of the container. The second area, Ground Support Equipment Area, 1-55 gallon container is used to hold waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. US AIRWAYS must ensure that these releases of hazardous waste are eliminated in the future.

4. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)

A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, thirteen satellite accumulation containers were noted as being open. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste.

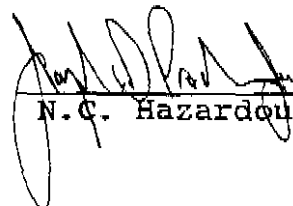
5. 40 CFR 262.40(a)

A generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the inspection, the facility failed to produce a copy of their 1997 Hazardous Waste Biennial Report. US AIRWAYS must locate a copy of the document to come into compliance.

You are hereby required to comply with the noted violation(s) by **January 6, 2000**, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13A .0701-.0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

December 6, 1999
(Date)

 Waste Mgmt. Spec.
N.C. Hazardous Waste Section

I, Joseph Parker, hereby certify that I have personally served a copy of this notice on: Ms. Leigh Kiser at 5020 Hangar Road, Charlotte, N.C. 28219 on December 6, 1999.

(CERTIFIED MAIL)
(Recipient Signature)

cc: Jesse Wells
central files

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: US AIRWAYS
Location: 5020 Hangar Road, Charlotte, N.C. 28219
Mailing Address: P.O. Box 19368, Charlotte, N.C. 28219
EPA ID#: NCD 986 227 957 Phone Number: (704) 359-2018
Contact/Title: Tim Cooksey, Dennis Watson
Inspection Date: Nov. 30, 1999 Last Inspection: Jan. 8, 1998
Status: LOG Type of Inspection: CEI
Inspector(s): Joseph Parker - DENR Hazardous Waste Section
Present at Inspection: Dennis Watson - US AIRWAYS, Virgil Misenheimer - US AIRWAYS, Tim Cooksey - US AIRWAYS, Bill Wheeler - US AIRWAYS

Type of Business: US AIRWAYS operates an aircraft maintenance facility for their fleet of airplanes and a ground support maintenance facility at this location.

Wastes Generated: The following hazardous waste streams have been generated since the last inspection:

D039 - Waste Combustible Liquid (petroleum naptha)
D006, D008 - Waste Compounds, Cleaning Liquid (monoethanolamine)
F003, F005 - Waste Paint Related Mat. (D001, D018, D035, D039, D040)
D001, U226 - Waste Aerosol Cans, Flammable
F002, F003, F005, D007 - Waste Flammable Liquids (acetone, toluene)
D001, D018 - Waste Flammable Liquids (jet fuel, kerosene)
F002, D018 - Hazardous Waste Solid (methylene chloride, benzene),
absorbent pads contaminated with Jet A Fuel
D006 - Hazardous Waste Solid (cadmium), NiCd batteries
D007, D035 - Hazardous Waste Solid (chromium, methyl ethyl ketone),
paint booth filters
D006, D007 - Hazardous Waste Solid (cadmium, chromium), waste dust
generated from sanding and painting operation.
D007 - Waste Chromic Acid
D002 - Waste Phosphoric Acid
D039 - Hazardous Waste Liq. (perchloroethylene, methylene chloride)
D005 - Hazardous Waste Solid (barium) - oxygen generators
D007, F002, F003 - Hazardous Waste Solid (methy. chloride, acetone)
D006, D007, D008 - Waste Flammable Solid (carbon dust, chromium)
D007 - Waste Cyanide Solution (chromic acid) - waste alodine

Manifests: Approved Transporters ? yes Approved TSDF ? yes
Filled Out Correctly ? yes Signed Copies ? yes *
LDR Notification Attached ? yes

The facility's 1999 and 1998 hazardous waste manifests were reviewed. During the inspection, no signed copies were provided for manifests #99047(07-16-99) and #98058(10-15-98). Both manifests were faxed by the TSD during the inspection. Violation corrected.

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

Transporters: Safety-Kleen Systems, Inc. - ILD 984 908 202
Southco - NCR 000 002 501
Four Seasons Environmental - NCD 991 277 732
Fisher Industrial Service - ALD 981 020 894
Ecoflo, Inc. - NCD 980 842 132
STAT, Inc. - NCD 980 799 142

TSD's: Safety-Kleen Systems, Inc. - NCD 079 060 059
Ecoflo, Inc. - NCD 980 842 132
Fisher Industrial Service, Inc. - ALD 981 020 894

Waste Minimization: Yes, documented in a written plan dated November 1, 1993. Plan includes the following items: 1) Haz. Waste reduction through substitution, efficient use, waste segregation between hazardous and non-hazardous, 2) Self inspections, 3) Employee environmental training

Inspection Records:

Evidence that inspections are conducted: The facility's policy is to conduct weekly inspections on containers in their 90 day storage area.

Inspections on Storage Area: These required inspections are not being conducted on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999.

Inspection on H.W. Tanks: N/A

Inspections on Ancillary Equipment: N/A

Contingency Plan:

On-Site ? Yes

Any changes to facility/processes or Emergency Coordinator since last review? Yes, facility has made a few construction changes to the facility. None of these changes affected their hazardous waste generation.

Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documentation provided

Training Records:

Certified Training Documents Available? Yes

New Employees Since Last Inspection? Yes, all new employees are trained within one month of their hire date.

Evidence of Improper/Inadequate Training? Yes, during the inspection, there was evidence that 5 employees were not trained within their annual (365 day) training date. The employees were as follows: Scott Safford, Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259.

Page Three - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957

Inspection Date: July 24, 1997

Biennial Report Submitted? The facility could not produce a copy of their 1997 Biennial Report that was submitted in 1998.

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Releases of hazardous waste were observed at the painting area in the Ground Support Equipment Building and the paint booth area located in the main hangar.

Internal Communications or Alarm Present? The facility has walkie-talkies, PA System, and an internal alarm with pull-down switches, infrared.

Portable Fire Extinguishers and/or Fire Control Equipment? The facility has fire extinguishers throughout the facility with fire hoses.

Spill Control Equipment: The facility has spill response carts that contain absorbent (pads, booms, loose), shovels, and a variety of personal protective equipment.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? The facility has automatic sprinklers, hoses, water

All Equipment/Alarms Tested and Maintained? Annually

All Personnel Handling HW have Access to Alarm/Device? Yes

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): The facility has nine location set up for the satellite accumulation of hazardous waste. These areas and the observations noted during the inspection are as follows:

1. Bay 3 Area

- | | |
|------------------|---|
| Waste Stream 6 - | 1-55 gallon container holding hazardous waste liquid (D001, D007, F001, F002, F003, F004, F005) - In Compliance. |
| Waste Stream 4 - | 1-55 gallon container holding hazardous waste solid (F002, D018) - noted as being open, without the ring lock secured. |
| Waste Stream 1 - | 1-55 gallon container holding hazardous waste liquid (D001, F001, F002) - noted as being open, without the small bung cap secured in the container. |
| Waste Stream 5 - | 1-55 gallon container holding hazardous waste solid (F002, F003, D007) - noted as being open, without the ring lock secured. |

Page Four - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

- Miscellaneous - 1-55 gallon container holding waste aerosol cans (D001, U226) - noted as being open, without the ring lock - secured.
- Miscellaneous - 1 plastic container with the top cut out was noted as holding spent fluorescent light tubes. Mr. Watson indicated that these tubes would be disposed of in the dumpster. Normally, when a large change out of tubes occur, they manifest them off site as a Universal Waste.

2. Paint Booth Area

- Right Side - 1-55 gallon container holding waste paint related material (acetone, toluene). The container was noted with open with the lid of the funnel in the upright position. Additionally, releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of the container.
- Left Side - 1-55 gallon container holding waste dust from the paint/sanding operation (D006, D007) - noted as being open, without the ring lock secured.

3. Composite Area

- a. 1-55 gallon container holding hazardous waste solid (methyl ethyl ketone, chromium) consisting of waste paint filters. The container was noted as being open, without the ring lock secured around the top.
- b. 1-55 gallon container holding hazardous waste liquid (waste resin containers) - noted as being open, without the ring lock secured around the top.

- 4. Slide Shop Area - 1-55 gallon container holding rags contaminated with methyl ethyl ketone. In Compliance.

- 5. Accessory Shop Area - 1-55 gallon container holding waste nickel/cadmium batteries (D006). In Compliance.

6. Ground Support Equipment

- 1st Area - (Paint Booth) 1-55 gallon container holding waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container.

The first part of the paper discusses the importance of maintaining accurate records of all transactions. It is essential for the company to have a clear and concise record of all financial activities, including sales, purchases, and expenses. This will allow the company to track its performance over time and identify areas for improvement.

The second part of the paper discusses the importance of maintaining accurate records of all transactions. It is essential for the company to have a clear and concise record of all financial activities, including sales, purchases, and expenses. This will allow the company to track its performance over time and identify areas for improvement.

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

2nd Area -

- Waste Stream 1 - 1-55 gallon container holding waste jet fuel/kerosene - noted in compliance.
- Waste Stream 4 - 1-55 gallon container holding waste methylene chloride/benzene rags - noted without the ring lock secured around the top of the container.
- Miscellaneous - 1-55 gallon container holding waste aerosol cans - noted without the ring lock secured around the top of the container.

7. Plant Maintenance

- a. 1-55 gallon container holding hazardous waste solid (D005-Barium) - oxygen generators - noted as being open without the ring lock secured around the top of the container.
- b. 1-55 gallon container used as a lab pack for methyl ethyl ketone and toluene bottles (D001, D005, D007, D008) - noted as being open without the ring lock secured around the top of the container.
- c. 1-35 gallon container holding waste flammable items (canisters of pepper spray) - noted as being open without the ring lock secured around the top of the container.

Satellite Containers:

Closed? No. 13 containers noted as holding hazardous waste were observed open during the inspection.

Labeled/Contents Identified? Yes

< 55 Gallons? Due to safety concerns, the facility has been given permission to stage more than 55 gallons of hazardous waste at one satellite accumulation point.

Storage Area(s): 1 Description: The facility's 90 day storage area is located on the west side of the main hangar building. During the inspection, 40-55 gallon containers were observed in storage. The facility has a limited amount of storage space available for their containers of hazardous waste. They have been forced to store containers outside their fenced in storage area. It will be extremely important that weekly inspections are conducted on these containers since they are not in a secured location. A recommendation will be made concerning this area.

Containers: Closed? yes Aisle Space? yes Labeled? yes
Dated? yes Evidence of Release? none observed
< 90 Days? yes Good Condition? yes

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Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

Other HW Units: (Applicable Regulations)

Description of Unit: 2 Used oil tanks : 1-1000 gallon tank located at the Ground Support Equipment Area and 1-500 gallon tank located at the main hangar. Both tanks were in compliance.

External Facility Condition: Good

Site Deficiencies: The following site deficiencies were noted during the inspection conducted on November 30, 1999:

1. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174 , states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, it was noted that the facility was not performing these inspections on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. The facility must perform and document these inspections on containers stored in their 90 day storage area every seven days.

2. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

During the inspection, a review of the facility's training records indicated that five employees were not trained within their annual training date in 1999. The following employees were Mr. Scott Safford, Mr. Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259.

3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.31, states that a facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, releases of waste paint related material were observed at two separate satellite accumulation areas. The first area, the Paint Booth Area located in the Hangar, 1-55 gallon container is used to hold waste paint related material (acetone, toluene). The releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of

Page Seven - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

the container. The second area, Ground Support Equipment Area, 1-55 gallon container is used to hold waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. US AIRWAYS must ensure that these releases of hazardous waste are eliminated in the future.

4. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a), states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, thirteen satellite accumulation containers were noted as being open. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste.

5. 40 CFR 262.40(a), states that a generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the inspection, the facility failed to produce a copy of their 1997 Hazardous Waste Biennial Report. US AIRWAYS must locate a copy of the document to come into compliance.

Recommendations: The following recommendations are offered as part of the compliance evaluation inspection conducted on November 30, 1999.

1. During the inspection, there was a noticeable lack of space in the facility's 90 day storage area. They have been forced to store containers outside their fenced in storage area. The facility may want to consider expanding this area to accommodate an increase in their generation of hazardous waste.
2. During the inspection, it was noted that the facility needs to improve their recordkeeping procedures. Weekly inspection forms and copies of the past hazardous waste biennial reports were unavailable for review. The facility will need to correct their current procedures or develop new procedures for maintaining these documents.
3. The facility needs to update their Waste Minimization Plan to show current efforts at this location.
4. During the inspection, the housekeeping of the Bay 3 satellite accumulation point was noted as being poor. A variety of trash including boxes and empty containers were observed in this area. This area should be kept clean of this material.

Page Eight - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

5. During the inspection, a container holding spent fluorescent light tubes was observed in the area of Bay 3. Facility personnel indicated that these bulbs were destined to be put in their solid waste dumpster. Normally, during large change outs, fluorescent light tubes are re-packed in their original boxes and sent off as Universal Waste. It is recommended that these bulbs, generated from individual change outs, be re-packed and sent off as Universal Waste.

Comments:

To document the site deficiencies noted above, a Ticket Notice of Violation will be issued to US AIRWAYS. The facility will be given 30 days in which to come into compliance with these violations. The facility should submit information on or before the compliance date noted in the NOV, as to the steps they have taken to come into compliance. Addressing each violation separately and providing other documentation such as pictures and documented paperwork will be sufficient. If there are any questions concerning this inspection report, you may contact me at the Mooresville Regional Office (704) 663-1699.

If US AIRWAYS fails to respond in the time period given, further enforcement actions will be carried out. An explanation of these further actions can be found on the bottom of the Ticket Notice of Violation issued.


Inspector

12-6-99
(Date)

(CERTIFIED MAIL)
Facility Contact

(Date)

Follow Up Inspection:

Comments: _____

Inspector

(Date)

Facility Contact

(Date)

FACILITY INFORMATION:	Submittal Information	Initial Date -	Corrected Date -
	By-	By-	By-
EPA ID Number:	RCRA Comp. Section:	___/___/___	___/___/___
<u>NICD986227957</u>	Received:	___/___/___	___/___/___
	Entered/Returned:	___/___/___	___/___/___

Facility Name: US AIRWAYSCity: CHARLOTTEEVALUATION DATA: New: ☒ Change: ☐ Delete: ☐ (☐ : Required)Agency: S Date: 1/1/30/99Type: C/E/I

Control Number Data Entry Personnel

Person: 0219 Reason: 17

Evaluation Comments:

(74) 1: TICKET NOV ISSUED - DOCKET # 2000-037

2:

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNN/SNN evaluations. The SNN/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)
- a SNC (SNN evaluation)

or - no longer a SNC (SNN eval.)

Date of determination:

S as
a eval.: 1/1/30/99

- or -

VIOLATION DATA: New: ☒ Change: ☐ Delete: ☐#1 Agency: S Type: G/P/T Date (mdy) 1/1/30/99 Class: 1Determined: 1/1/30/99Priority: 1Branch: 011Person: 0219Seq. (Data Entry) Number 1Return to Compliance: 011/06/00

-- Scheduled --

--- Actual ---

Reg. Type: S/RReg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.174Comment (72): FACILITY NOT CONDUCTING WEEKLY INSPECTION#2 Agency: S Type: G/P/T Date (mdy) 1/1/30/99 Class: 1Determined: 1/1/30/99Priority: 1Branch: 011Person: 0219Seq. (Data Entry) Number 1Return to Compliance: 011/06/00

-- Scheduled --

--- Actual ---

Reg. Type: S/RReg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c)Comment (72): NO ANNUAL TRAINING CONDUCTED FOR 5 EMPLOYEES#3 Agency: S Type: G/P/T Date (mdy) 1/1/30/99 Class: 1Determined: 1/1/30/99Priority: 1Branch: 011Person: 0219Seq. (Data Entry) Number 1Return to Compliance: 011/06/00

-- Scheduled --

--- Actual ---

Reg. Type: S/RReg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.31Comment (72): RELEASES OF HAZARDOUS WASTE ON 2 CONTAINERS

Continue violation date on Side B if necessary -

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: <input type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/> (---: Required)			
Agency: <input type="text"/>	Type: <input type="text"/>	Date: <input type="text"/> / <input type="text"/> / <input type="text"/>	Seq.# (Data Entry) <input type="text"/>
Person: <input type="text"/>	Branch: <input type="text"/>	Poll. Prev. Measures: <input type="text"/>	<input type="text"/>
Penalty Data Proposed: \$ <input type="text"/>		1) Payments: \$ <input type="text"/>	Date Paid: <input type="text"/> / <input type="text"/> / <input type="text"/>
Settled/Final: \$ <input type="text"/>		2) \$ <input type="text"/>	<input type="text"/> / <input type="text"/> / <input type="text"/>
Enforcement Comments: 1: <u>TICKET NOV ISSUED - DOCKET # 2000-037</u>			
2: _____			
Cite violations addressed by this action below -			
VIOLATION DATA: New: <input checked="" type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/>			
#4 Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. Number (Data Entry) <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- <input type="text"/> / <input type="text"/> / <input type="text"/>	
Reg. Type: <input type="text"/>		Reg. Description (30): <u>40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)</u>	
Comment (72): <u>13 satellite accumulation containers were observed open.</u>			
#5 Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. Number (Data Entry) <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- <input type="text"/> / <input type="text"/> / <input type="text"/>	
Reg. Type: <input type="text"/>		Reg. Description (30): <u>40 CFR 262.40(a)</u>	
Comment (72): <u>No copy of their most recent Biennial Report on file.</u>			
# Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. Number (Data Entry) <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- <input type="text"/> / <input type="text"/> / <input type="text"/>	
Reg. Type: <input type="text"/>		Reg. Description (30): _____	
Comment (72): _____			
# Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy) Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>	Class: <input type="text"/>
Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Seq. Number (Data Entry) <input type="text"/>
Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled --- <input type="text"/> / <input type="text"/> / <input type="text"/>	
Reg. Type: <input type="text"/>		Reg. Description (30): _____	
Comment (72): _____			

More violations for this enforcement action on other side ? Yes. ☐ No ☐

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: <input type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/> (---: Required)									
Agency: <input type="text"/>		Type: <input type="text"/>		Date: <input type="text"/> / <input type="text"/> / <input type="text"/>			Seq.# (Data Entry) <input type="text"/>		
Person: <input type="text"/>		Branch: <input type="text"/>		Poll. Prev. Measures: <input type="text"/>			<input type="text"/>		
Penalty Data Proposed: \$ <input type="text"/>				1) Payments: \$ <input type="text"/>			Date Paid: <input type="text"/> / <input type="text"/> / <input type="text"/>		
Settled/Final: \$ <input type="text"/>				2) \$ <input type="text"/>			<input type="text"/> / <input type="text"/> / <input type="text"/>		
Enforcement Comments: 1: <u>TICKET NOV ISSUED - DOCKET # 2000-037</u> (74) 2: _____ Cite violations addressed by this action below -									
VIOLATION DATA: New: <input checked="" type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/>									
#1	Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy): <input type="text"/> / <input type="text"/> / <input type="text"/>	Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>		Class: <input type="text"/>		Seq. (Data Entry) Number <input type="text"/>	
	Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled ---		--- Actual ---	
	Reg. Type: <input type="text"/>	Reg. Description (30): <u>40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)</u>							
	Comment (72): <u>13 satellite accumulation containers were observed open.</u>								
#5	Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy): <input type="text"/> / <input type="text"/> / <input type="text"/>	Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>		Class: <input type="text"/>		Seq. (Data Entry) Number <input type="text"/>	
	Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled ---		--- Actual ---	
	Reg. Type: <input type="text"/>	Reg. Description (30): <u>40 CFR 262.40(a)</u>							
	Comment (72): <u>No copy of their most recent Biennial Report on file.</u>								
#	Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy): <input type="text"/> / <input type="text"/> / <input type="text"/>	Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>		Class: <input type="text"/>		Seq. (Data Entry) Number <input type="text"/>	
	Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled ---		--- Actual ---	
	Reg. Type: <input type="text"/>	Reg. Description (30): _____							
	Comment (72): _____								
#	Agency: <input type="text"/>	Type: <input type="text"/>	Date (mdy): <input type="text"/> / <input type="text"/> / <input type="text"/>	Determined: <input type="text"/> / <input type="text"/> / <input type="text"/>		Class: <input type="text"/>		Seq. (Data Entry) Number <input type="text"/>	
	Priority: <input type="text"/>	Branch: <input type="text"/>	Person: <input type="text"/>	Return to Compliance: <input type="text"/> / <input type="text"/> / <input type="text"/>		--- Scheduled ---		--- Actual ---	
	Reg. Type: <input type="text"/>	Reg. Description (30): _____							
	Comment (72): _____								

More violations for this enforcement action on other side ?

Yes

☐

No

☐

Region 4 Compliance Data Entry Form - 34

	Submittal Information	Initial By- Date -	Corrected By- Date -
FACILITY INFORMATION:	RCRA Comp. Section:	___/___/___	___/___/___
EPA ID Number:	Received:	___/___/___	___/___/___
<div style="border: 1px solid black; padding: 2px;">NCID986227957</div>	Entered/Returned:	___/___/___	___/___/___
Facility Name: <u>US AIRWAYS</u> City: <u>CHARLOTTE</u>			
EVALUATION DATA: New: <input checked="" type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/> (<input type="checkbox"/> : Required)			
Agency: <u>S</u>	Mo. <u>11</u> Day <u>30</u> Year <u>1999</u>	Type: <u>CET</u>	Control Number Data Entry Personnel <u>17</u>
Person: <u>10219</u>	Reason: <u>1</u>		
Evaluation Comments: (74) 1: <u>TICKET NOV ISSUED - DOCKET # 2000-037</u> 2: _____			
SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.) Facility is (Check one) - a SNC (SNY evaluation) _____ Date of determination: _____ or - no longer a SNC (SNN eval.) _____ as of _____ or _____			
VIOLATION DATA: New: <input checked="" type="checkbox"/> Change: <input type="checkbox"/> Delete: <input type="checkbox"/>			
#1 Agency: <u>S</u>	Type: <u>GIPIT</u>	Date (mdy) Determined: <u>11/30/1999</u>	Class: <u>1</u>
Priority: <input type="checkbox"/>	Branch: <u>1011</u>	Person: <u>10219</u>	Seq. (Data Entry) Number <u>1</u>
Reg. Type: <u>SIR</u>	Return to Compliance: <u>1011/1016/1010</u>	--- Scheduled --- --- Actual ---	
Reg. Description (30): <u>40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174</u>			
Comment (72): <u>FACILITY NOT CONDUCTING WEEKLY INSPECTION</u>			
#2 Agency: <u>S</u>	Type: <u>GIPIT</u>	Date (mdy) Determined: <u>11/30/1999</u>	Class: <u>1</u>
Priority: <input type="checkbox"/>	Branch: <u>1011</u>	Person: <u>10219</u>	Seq. (Data Entry) Number <u>1</u>
Reg. Type: <u>SIR</u>	Return to Compliance: <u>1011/1016/1010</u>	--- Scheduled --- --- Actual ---	
Reg. Description (30): <u>40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c)</u>			
Comment (72): <u>NO ANNUAL TRAINING CONDUCTED FOR 5 EMPLOYEES</u>			
#3 Agency: <u>S</u>	Type: <u>GIPIT</u>	Date (mdy) Determined: <u>11/30/1999</u>	Class: <u>1</u>
Priority: <input type="checkbox"/>	Branch: <u>1011</u>	Person: <u>10219</u>	Seq. (Data Entry) Number <u>1</u>
Reg. Type: <u>SIR</u>	Return to Compliance: <u>1011/1016/1010</u>	--- Scheduled --- --- Actual ---	
Reg. Description (30): <u>40 CFR 262.34(a)(4) ref. 40 CFR 265.31</u>			
Comment (72): <u>RELEASES OF HAZARDOUS WASTE ON 2 CONTAINERS</u>			

Continue violation date on Side E if necessary -

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
MOORESVILLE REGIONAL OFFICE



Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

JAMES B. HUNT JR.
GOVERNOR

To: US AIRWAYS
5020 Hangar Road
Charlotte, N.C. 28219

Docket #: 2000 - 037
Insp. Date: Nov. 30, 1999
Facility Type: LQG

WAYNE MCDEVITT
SECRETARY

EPA ID#: NCD 986 227 957

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On November 30, 1999, Mr. Joseph Parker representing the North Carolina Hazardous Waste Section inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations was noted:

Citation

Specifics

1. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, it was noted that the facility was not performing these required inspections on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. The facility must perform and document these inspections on containers stored in their 90 day storage area every seven days.

2. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c)

Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

During the inspection, a review of the facility's training records indicated that five employees were not

trained within their annual training date in 1999. The following employees were Mr. Scott Safford, Mr. Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259.

3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.31

A facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, releases of waste paint related material were observed at two separate satellite accumulation areas. The first area, the Paint Booth Area located in the Hangar, 1-55 gallon container is used to hold waste paint related material (acetone, toluene). The releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of the container. The second area, Ground Support Equipment Area, 1-55 gallon container is used to hold waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. US AIRWAYS must ensure that these releases of hazardous waste are eliminated in the future.

4. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a)

A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, thirteen satellite accumulation containers were noted as being open. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste.

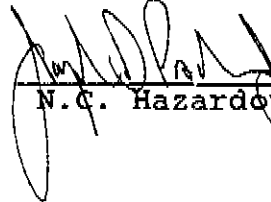
5. 40 CFR 262.40(a)

A generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the inspection, the facility failed to produce a copy of their 1997 Hazardous Waste Biennial Report. US AIRWAYS must locate a copy of the document to come into compliance.

You are hereby required to comply with the noted violation(s) by **January 6, 2000**, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13A .0701-.0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

December 6, 1999
(Date)

 - Waste Mgmt. Spec.
N.C. Hazardous Waste Section

I, Joseph Parker, hereby certify that I have personally served a copy of this notice on: Ms. Leigh Kiser at 5020 Hangar Road, Charlotte, N.C. 28219 on December 6, 1999.

(CERTIFIED MAIL)
(Recipient Signature)

cc: Jesse Wells
central files

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: US AIRWAYS
Location: 5020 Hangar Road, Charlotte, N.C. 28219
Mailing Address: P.O. Box 19368, Charlotte, N.C. 28219
EPA ID#: NCD 986 227 957 Phone Number: (704) 359-2018
Contact/Title: Tim Cooksey, Dennis Watson
Inspection Date: Nov. 8, 1999 Last Inspection: Jan. 8, 1998
Status: LOG Type of Inspection: CEI
Inspector(s): Joseph Parker - DENR Hazardous Waste Section
Present at Inspection: Dennis Watson - US AIRWAYS, Virgil Misenheimer - US AIRWAYS, Tim Cooksey - US AIRWAYS, Bill Wheeler - US AIRWAYS

Type of Business: US AIRWAYS operates an aircraft maintenance facility for their fleet of airplanes and a ground support maintenance facility at this location.

Wastes Generated: The following hazardous waste streams have been generated since the last inspection:

D039 - Waste Combustible Liquid (petroleum naptha)
D006, D008 - Waste Compounds, Cleaning Liquid (monoethanolamine)
F003, F005 - Waste Paint Related Mat. (D001, D018, D035, D039, D040)
D001, U226 - Waste Aerosol Cans, Flammable
F002, F003, F005, D007 - Waste Flammable Liquids (acetone, toluene)
D001, D018 - Waste Flammable Liquids (jet fuel, kerosene)
F002, D018 - Hazardous Waste Solid (methylene chloride, benzene),
absorbent pads contaminated with Jet A Fuel
D006 - Hazardous Waste Solid (cadmium), NiCd batteries
D007, D035 - Hazardous Waste Solid (chromium, methyl ethyl ketone),
paint booth filters
D006, D007 - Hazardous Waste Solid (cadmium, chromium), waste dust
generated from sanding and painting operation.
D007 - Waste Chromic Acid
D002 - Waste Phosphoric Acid
D039 - Hazardous Waste Liq. (perchloroethylene, methylene chloride)
D005 - Hazardous Waste Solid (barium) - oxygen generators
D007, F002, F003 - Hazardous Waste Solid (methy. chloride, acetone)
D006, D007, D008 - Waste Flammable Solid (carbon dust, chromium)
D007 - Waste Cyanide Solution (chromic acid) - waste alodine

Manifests: Approved Transporters ? yes Approved TSDF ? yes
Filled Out Correctly ? yes Signed Copies ? yes *
LDR Notification Attached ? yes

The facility's 1999 and 1998 hazardous waste manifests were reviewed. During the inspection, no signed copies were provided for manifests #99047(07-16-99) and #98058(10-15-98). Both manifests were faxed by the TSD during the inspection. Violation corrected.

Page Two - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

Transporters: Safety-Kleen Systems, Inc. - ILD 984 908 202
Southco - NCR 000 002 501
Four Seasons Environmental - NCD 991 277 732
Fisher Industrial Service - ALD 981 020 894
Ecoflo, Inc. - NCD 980 842 132
STAT, Inc. - NCD 980 799 142

TSD's: Safety-Kleen Systems, Inc. - NCD 079 060 059
Ecoflo, Inc. - NCD 980 842 132
Fisher Industrial Service, Inc. - ALD 981 020 894

Waste Minimization: Yes, documented in a written plan dated November 1, 1993. Plan includes the following items: 1) Haz. Waste reduction through substitution, efficient use, waste segregation between hazardous and non-hazardous, 2) Self inspections, 3) Employee environmental training

Inspection Records:

Evidence that inspections are conducted: The facility's policy is to conduct weekly inspections on containers in their 90 day storage area.

Inspections on Storage Area: These required inspections are not being conducted on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999.

Inspection on H.W. Tanks: N/A

Inspections on Ancillary Equipment: N/A

Contingency Plan:

On-Site ? Yes

Any changes to facility/processes or Emergency Coordinator since last review? Yes, facility has made a few construction changes to the facility. None of these changes affected their hazardous waste generation.

Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documentation provided

Training Records:

Certified Training Documents Available? Yes

New Employees Since Last Inspection? Yes, all new employees are trained within one month of their hire date.

Evidence of Improper/Inadequate Training? Yes, during the inspection, there was evidence that 5 employees were not trained within their annual (365 day) training date. The employees were as follows: Scott Safford, Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259.

Page Three - RCRA Inspection Report

Facility Name: US AIRWAYS

EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997

Biennial Report Submitted? The facility could not produce a copy of their 1997 Biennial Report that was submitted in 1998.

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Releases of hazardous waste were observed at the painting area in the Ground Support Equipment Building and the paint booth area located in the main hangar.

Internal Communications or Alarm Present? The facility has walkie-talkies, PA System, and an internal alarm with pull-down switches, infrared.

Portable Fire Extinguishers and/or Fire Control Equipment? The facility has fire extinguishers throughout the facility with fire hoses.

Spill Control Equipment: The facility has spill response carts that contain absorbent(pads, booms, loose), shovels, and a variety of personal protective equipment.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? The facility has automatic sprinklers, hoses, water

All Equipment/Alarms Tested and Maintained? Annually

All Personnel Handling HW have Access to Alarm/Device? Yes

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): The facility has nine location set up for the satellite accumulation of hazardous waste. These areas and the observations noted during the inspection are as follows:

1. Bay 3 Area

- | | |
|------------------|---|
| Waste Stream 6 - | 1-55 gallon container holding hazardous waste liquid (D001, D007, F001, F002, F003, F004, F005) - In Compliance. |
| Waste Stream 4 - | 1-55 gallon container holding hazardous waste solid (F002, D018) - noted as being open, without the ring lock secured. |
| Waste Stream 1 - | 1-55 gallon container holding hazardous waste liquid (D001, F001, F002) - noted as being open, without the small bung cap secured in the container. |
| Waste Stream 5 - | 1-55 gallon container holding hazardous waste solid (F002, F003, D007) - noted as being open, without the ring lock secured. |

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- Miscellaneous - 1-55 gallon container holding waste aerosol cans (D001, U226) - noted as being open, without the ring lock - secured.
- Miscellaneous - 1 plastic container with the top cut out was noted as holding spent fluorescent light tubes. Mr. Watson indicated that these tubes would be disposed of in the dumpster. Normally, when a large change out of tubes occur, they manifest them off site as a Universal Waste.

2. Paint Booth Area

- Right Side - 1-55 gallon container holding waste paint related material (acetone, toluene). The container was noted with open with the lid of the funnel in the upright position. Additionally, releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of the container.
- Left Side - 1-55 gallon container holding waste dust from the paint/sanding operation (D006, D007) - noted as being open, without the ring lock secured.

3. Composite Area

- a. 1-55 gallon container holding hazardous waste solid (methyl ethyl ketone, chromium) consisting of waste paint filters. The container was noted as being open, without the ring lock secured around the top.
- b. 1-55 gallon container holding hazardous waste liquid (waste resin containers) - noted as being open, without the ring lock secured around the top.

- 4. Slide Shop Area - 1-55 gallon container holding rags contaminated with methyl ethyl ketone. In Compliance.

- 5. Accessory Shop Area - 1-55 gallon container holding waste nickel/cadmium batteries (D006). In Compliance.

6. Ground Support Equipment

- 1st Area - (Paint Booth) 1-55 gallon container holding waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container.

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2nd Area -

- Waste Stream 1 - 1-55 gallon container holding waste jet fuel/kerosene - noted in compliance.
- Waste Stream 4 - 1-55 gallon container holding waste methylene chloride/benzene rags - noted without the ring lock secured around the top of the container.
- Miscellaneous - 1-55 gallon container holding waste aerosol cans - noted without the ring lock secured around the top of the container.

7. Plant Maintenance

- a. 1-55 gallon container holding hazardous waste solid (D005-Barium) - oxygen generators - noted as being open without the ring lock secured around the top of the container.
- b. 1-55 gallon container used as a lab pack for methyl ethyl ketone and toluene bottles (D001, D005, D007, D008) - noted as being open without the ring lock secured around the top of the container.
- c. 1-35 gallon container holding waste flammable items (canisters of pepper spray) - noted as being open without the ring lock secured around the top of the container.

Satellite Containers:

Closed? No, 13 containers noted as holding hazardous waste were observed open during the inspection.

Labeled/Contents Identified? Yes

< 55 Gallons? Due to safety concerns, the facility has been given permission to stage more than 55 gallons of hazardous waste at one satellite accumulation point.

Storage Area(s): 1 Description: The facility's 90 day storage area is located on the west side of the main hangar building. During the inspection, 40-55 gallon containers were observed in storage. The facility has a limited amount of storage space available for their containers of hazardous waste. They have been forced to store containers outside their fenced in storage area. It will be extremely important that weekly inspections are conducted on these containers since they are not in a secured location. A recommendation will be made concerning this area.

Containers: Closed? yes Aisle Space? yes Labeled? yes
Dated? yes Evidence of Release? none observed
< 90 Days? yes Good Condition? yes

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Other HW Units: (Applicable Regulations)

Description of Unit: 2 Used oil tanks : 1-1000 gallon tank located at the Ground Support Equipment Area and 1-500 gallon tank located at the main hangar. Both tanks were in compliance.

External Facility Condition: Good

Site Deficiencies: The following site deficiencies were noted during the inspection conducted on November 30, 1999:

1. 40 CFR 262.34(a)(1)(i) ref. 40 CFR 265.174 , states that the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, it was noted that the facility was not performing these inspections on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. The facility must perform and document these inspections on containers stored in their 90 day storage area every seven days.

2. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

During the inspection, a review of the facility's training records indicated that five employees were not trained within their annual training date in 1999. The following employees were Mr. Scott Safford, Mr. Bruce Jensen, Mr. Gary Sakariaseh, Mr. Victor Chavez, and Mr. Cecilio Perez. This is a repeat violation that was noted during the inspection conducted on June 24, 1997 and documented in Notice of Violation Docket #97-259.

3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.31, states that a facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, releases of waste paint related material were observed at two separate satellite accumulation areas. The first area, the Paint Booth Area located in the Hangar, 1-55 gallon container is used to hold waste paint related material (acetone, toluene). The releases of hazardous waste were observed on the funnel that was placed in the container, on the top of the container, and on the side of

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the container. The second area, Ground Support Equipment Area, 1-55 gallon container is used to hold waste paint material (acetone/toluene). Releases of hazardous waste were noted on the funnel that was placed in the container, on the top of the container, and on the side of the container. US AIRWAYS must ensure that these releases of hazardous waste are eliminated in the future.

4. 40 CFR 262.34(c)(1)(i) ref. 40 CFR 265.173(a), states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, thirteen satellite accumulation containers were noted as being open. US AIRWAYS must ensure that these containers are closed when not adding or taking away hazardous waste.

5. 40 CFR 262.40(a), states that a generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

During the inspection, the facility failed to produce a copy of their 1997 Hazardous Waste Biennial Report. US AIRWAYS must locate a copy of the document to come into compliance.

Recommendations: The following recommendations are offered as part of the compliance evaluation inspection conducted on November 30, 1999.

1. During the inspection, there was a noticeable lack of space in the facility's 90 day storage area. They have been forced to store containers outside their fenced in storage area. The facility may want to consider expanding this area to accommodate an increase in their generation of hazardous waste.
2. During the inspection, it was noted that the facility needs to improve their recordkeeping procedures. Weekly inspection forms and copies of the past hazardous waste biennial reports were unavailable for review. The facility will need to correct their current procedures or develop new procedures for maintaining these documents.
3. The facility needs to update their Waste Minimization Plan to show current efforts at this location.
4. During the inspection, the housekeeping of the Bay 3 satellite accumulation point was noted as being poor. A variety of trash including boxes and empty containers were observed in this area. This area should be kept clean of this material.

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5. During the inspection, a container holding spent fluorescent light tubes was observed in the area of Bay 3. Facility personnel indicated that these bulbs were destined to be put in their solid waste dumpster. Normally, during large change outs, fluorescent light tubes are re-packed in their original boxes and sent off as Universal Waste. It is recommended that these bulbs, generated from individual change outs, be re-packed and sent off as Universal Waste.

Comments:

To document the site deficiencies noted above, a Ticket Notice of Violation will be issued to US AIRWAYS. The facility will be given 30 days in which to come into compliance with these violations. The facility should submit information on or before the compliance date noted in the NOV, as to the steps they have taken to come into compliance. Addressing each violation separately and providing other documentation such as pictures and documented paperwork will be sufficient. If there are any questions concerning this inspection report, you may contact me at the Mooresville Regional Office (704) 663-1699.

If US AIRWAYS fails to respond in the time period given, further enforcement actions will be carried out. An explanation of these further actions can be found on the bottom of the Ticket Notice of Violation issued.


Inspector

12-6-99
(Date)

(CERTIFIED MAIL)
Facility Contact

(Date)

Follow Up Inspection:

Comments: _____

Inspector

(Date)

Facility Contact

(Date)

