Circle one:

DATE	ITEM
D 11.3.92	CEI - Compreheniue Evaluation Inspection
@11.3.92	NOV # 93-02A
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6) 1.10.94	CEI Report - Comprehenile Exclusion Tunp.
@ 3.9.94	NOV#94-074
(7)4112.94	<u>CSE</u>
Q 11-07-95	CEI Report
Q6-84-94	CET LODOUT
(10)4-24-97	CSE roport
(1 <u>)10-9-94</u>	CEI roport
(B) 1-8-98	CEI roport
(B) 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

G- General, I- Inspections P- Permits, GW- Ground Water

C- Closure

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 <u>Records</u>

<u>Disposition</u> <u>Schedule</u> published by the North Carolina Division of Archives and History.

# Additional forms may be ordered from:

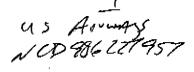
Solid & Hazardous Waste Management Branch Division of Health Services P. O. Box 2091 Raleigh, NC 27602-2091



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960





OCT - 6 200

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. Laplerre, 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) <u>Inspector and Author of Report</u>

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) <u>Date of Inspection</u>

July 24, 2000

## 6) <u>Applicable Regulations</u>

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

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# 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 Penalites, 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

12) Concurrence

Kenneth Lapierre, Chief

North Enforcement & Compliance Section

RCRA Enforcement and Compliance Branch

07/24/2000

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7-8/97)	(

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## RCRA INSPECTION REPORT

X = VIOLATION NOTED NA = NOT APPLICABLE

Facility Name: <u>US AIRWAYS</u> 5020 Hangar Road, Charlotte, N.C. 28219 Mailing Address: P.O. Box 19368, Charlotte, N.C. 28219 Phone Number: (704) 359-2018 EPA ID#: NCD 986 227 957 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: <u>CSE</u> Inspector(s): <u> Joseph Parker - DENR Hazardous Waste Section.</u> 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: <u>US AIRWAYS operates an aircraft maintenance</u> 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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Page Two - RCRA Inspection Report

Facility Name: <u>US AIRWAYS</u>

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

Manifests:

Approved Transporters ? <u>ves</u> Approved TSDF ? <u>ves</u> Filled Out Correctly ? <u>yes</u> Signed Copies ? <u>yes \*</u>
LDR Notification Attached ? <u>yes</u>

<u>The facility's 1999 and 1998 hazardous waste manifests were</u> 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, 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: <u>US AIRWAYS</u>

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? <u>Yes</u>
New Employees Since Last Inspection? <u>Yes, all new employees are</u>
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: <u>US AIRWAYS</u>

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 walkietalkies, PA System, and an internal alarm with pull-down switches, infrared.

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

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

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

All Equipment/Alarms Tested and Maintained? <u>Annually</u>

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: <u>US AIRWAYS</u>

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

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Facility Name: <u>US AIRWAYS</u>

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

lst Area -(Paint Booth) 1-55 gallon container holding waste paint material(acetone/toluene). Releases 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. VIOLATION.

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Facility Name: <u>US AIRWAYS</u>

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

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



Page Eight - RCRA Inspection Report Facility Name: <u>US AIRWAYS</u> 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? <u>Yes</u> < 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? <u>yes</u> Aisle Space? <u>yes</u> Labeled? <u>yes</u>

Dated? <u>yes</u> Evidence of Release? <u>none observed</u>

Dated? <u>yes</u> Evidence of Release? <u>none observed</u> < 90 Days? <u>yes</u> Good Condition? <u>yes</u>

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.

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Facility Name: US AIRWAYS

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

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. 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



Page Ten - RCRA Inspection Report

Facility Name: <u>US AIRWAYS</u>

EPA ID#: NCD 986 227 957 Inspection Date: <u>July 24, 2000</u>

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:

 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 resubmit 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.

Inspector

1-26-2000

Date

CENTIFIED MAIL

Facility Contact/

(Date)

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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.

Sincerety

R. J. Edwards III

Administrative Officer

Division of Waste Management

CC: Attorney general Central Files

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OMB#: 2050-0024 Expires 08/30/00

BEFORE COPYING FORM, ATTA OR ENTER:	CH SITE IDENTIFICATION LABEL		U.S. ENVIRONMENTAL PROTECTION AGENCY
SITE NAME: US AIR NOUS	ED. CHARLOTTE NO SK308	No contract	1997 Hazardous Waste Report
	161 1213171	FORM	IDENTIFICATION AND CERTIFICATION
			instructions and forms booklet before each section is provided below.
Sec. I Sits name and location absent, enter information	addrexs. Check the box o in items A on. Instructions page 7.	, B, C, E, F, G, and H if s	arme as label; if different, enter corrections. If label is
A EPAID No. Same as label D or IN I CIDI	9.8.6 227 9.517	B. County Same as label □ or →	MECKLEN BURG
C. Site/company name Same so label = or — US /	Pirways		associated with this EPA ID changed since 1995? 2 No
E. Street name and number. If no Same as label to or → 50d(	t applicable, enter Industrial park, bui	ding name, or other phy	sktal location descriptus.
F. City, town, village Same as label □ or → CHAR	LOTTE	G. Stair Same to label D or - NIC	H. Zip Code Same as label Fire + 1018181-111
Sec. 11 Mailing address of site.	Instructions page 7.		
A is the mailing address the same	as the location address? 0 1 Y	es (SKIP TO SEC. III)	¥2 No (CONTINUE TO BOX B)
B. Number and street name of ma	fling address P.O. Box	19368	
C. City, town, village CHARL	37Ta	D. State	E. Zp Code (28/2) (19)-[11]
Sec. III Name, little, and telepho	ne number of the person who should	be contacted if question	s arise regarding this report. Instructions page 7.
	STREME M.L.	B. Tide MAN AGEL -	C. Telephone Number 17:0:4: 13:5:9:-12:2:4-9:
*110017	((F)	PLANT MAINT	Extension [ ] [ ]
system designed to ass person or persons who to the best of my knowle	ure that qualified personnel properly on manage the system, or those persons edge and belief, true, accurate and co tion and Recovery Act for submitting	gether and evaluate the l s directly responsible for emplete. I am eware that	inder my direction or supervision in accordance with a information submitted. Based on my inquiry of the gathering the information, the information submitted is, there are significant penalties under Section 3008 of any the possibility of fine and imprisonment for knowing
A. Last Name Fir	st name M.t.	B. Title	
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Page 1 of Ac.

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Sec. V Generator status. Instructions	begin on page 8.			
A. 1997 RCRA generator status	B. Reason for not generating			
(CHECK ONE BOX BELOW)	(CHECK ALL THAT APPLY)			
e 1 LQG D 2 SOG SKIP TO SEC. VI D 3 CESQG D 4 Non-generator (CONTINUE TO BOX 8)	□ 1 Never generated □ 2 Out of business □ 3 Only excluded or delisted of 4 Only non-hazardous waste			
Sec. VI On-site waste management sta	tus. Instructions page 10,			
A. Storage subject to RCRA permitting rec	quiroments	B. Treatment, disposal, or recycling subject to RCRA permitting requirements		
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EPA ID NO:

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BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

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# U.S. ENVIRONMENTAL PROTECTION AGENCY

1997 Hazardous Waste Report

FORM GM WASTE 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. 1 A. Waste description (page 12)

WASTE PAINT BOOTH FILTERS	
8, EPA hazardous waste code D:0:0:7 1 1 1 (page 12)	C. State hazardous waste code (page 13)
O. SIC code . E. Origin coca [] F. Source code (page 13) System Type (Oage 14) - [XI   I   I   I   I   I   I   I   I   I	G. Point of H. Form code (page 14) (page 14) (page 14) (page 14)
Bec. II A. Quantity generated in 1997 (page 15)  Littit 1 4 955 0  Density Littit 1 105/gal 0 2 5-3	C. Did this site do any of the following to this waste; treat on the, of process on site, recycle on site, or decharge to a sewer/POTY/? (paure 15)  = 1 Yes (CONTINUE TO ONISITE PROCESS SYSTEM 1)  \$\frac{2}{2}\text{No}\((\frac{5}{2}\text{KIP TO SEC. III}\)\)
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See. III A. Was any of this waste shipped off site in 1997 for treatment, disposition in 1997 for the 199	
Site 1 B. 52A ID No. of facility waste was shipped to (p. 57) (page 17) Shipped to (p. 17) (2) (C · 3 · :317) Shipped to (p. 17)	O. Off-alte availability E. Total quantity shipped in 1997 (page 17) code (page 17)
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Site 3 B. SPAID No. of facility waste was snipped to (p. System type (page 17) Shipped to (p. 17)	D. Off-site availability E. Total quantity shipped in 1997 (page 17) code (page 17)
Comments:	

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FORM GM BEFORE COPYING FORM, ATTACH BITE IDENTIFICATION LABEL OR U.S. ENVIRONMENTAL ENTER: PROTECTION AGENCY LIS ATTURES ED CHARLOTTE NE 27268 SITE NAME: 1997 Hazardous Waste Report WICH 1918/61 222171195171 EPA ID NO: WASTE GENERATION **FORM** AND MANAGEMENT GM 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. A. Waste description (page 12) PELATED MATERIAL WASTE PAINT (FICIOIS) 1F1010131 DOSA B. EPA hazardous waste code C. State hazardous waste code (page 13) DICICIS DICITIST DOAS (page 12) D1010111 O. SIC code G. Point of H. Form cade I. RCRA-madioactive mixed F. Source code E. Origin code 1/1 (page 13) measurement (page 14) (page 14) (page 14) -(page 13) System Type (0.14)14151/121 1362(O)621 <u>رکان ن</u>م [X | ] ] Sec. ii A. Quentity generated in 1997 C. Did this site do any of the following to this waste: treat on site, d i B. DOM (þage 15) dispose on site, recycle on site, or discharge to a sewer/POTW? (psup 15) (page 15) 111117830 Density [\_\_\_\_] ⊏ 1 lb #/gaJ # 2 #g = 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) X. 2 No (SKIP TO SEC. III) ON-SITE PROCESS BYSTEM 1 ON-SITE PROCESS SYSTEM 2 On-site procesa system typo Quantity treated, disposed, or recycled On-sité process system type Cuantity treated, disposed, or recycled (page 16) ch site in 1997 (page 18) on site in 1997 (page 18) (page 16) M. | | | (M1 1 1 1 Şac. III A. Was any of this waste shicked off site in 1997 for treatment, disposal, or recycling? (page 17) X 1 Yes (CONTINUE TO ECX 8) = 2 No (FCRM IS COMPLETE) Site 1 B. EPA ID No. of facility wasta was shipped to E. Total quantity shipped in 1997 (page 17) C. System type D. Off-site availability anipoed to (p. 37) (page 17) stice (page 17) 7830 NICID: 10,7:9: 0:6:0:0:5:9: MI. B. EPA ID No. of facility wasts was shipped to Site 2 C. System type D. Off-age evailability E. Total quantity shipped in 1297 (page 17). (page 17) shipped to (p. 17) ccóé (page 17) 1¥1 : <u>1</u> [ B. EPA ID No. of facility waste was shipped to Site 3 E. Total quantity shipped in 1997 (page 17) D. Off-site availability C. System type (page (7) code (page 17) shipped to (p. 17) L<sup>M</sup>1 J 1 1 Commants:

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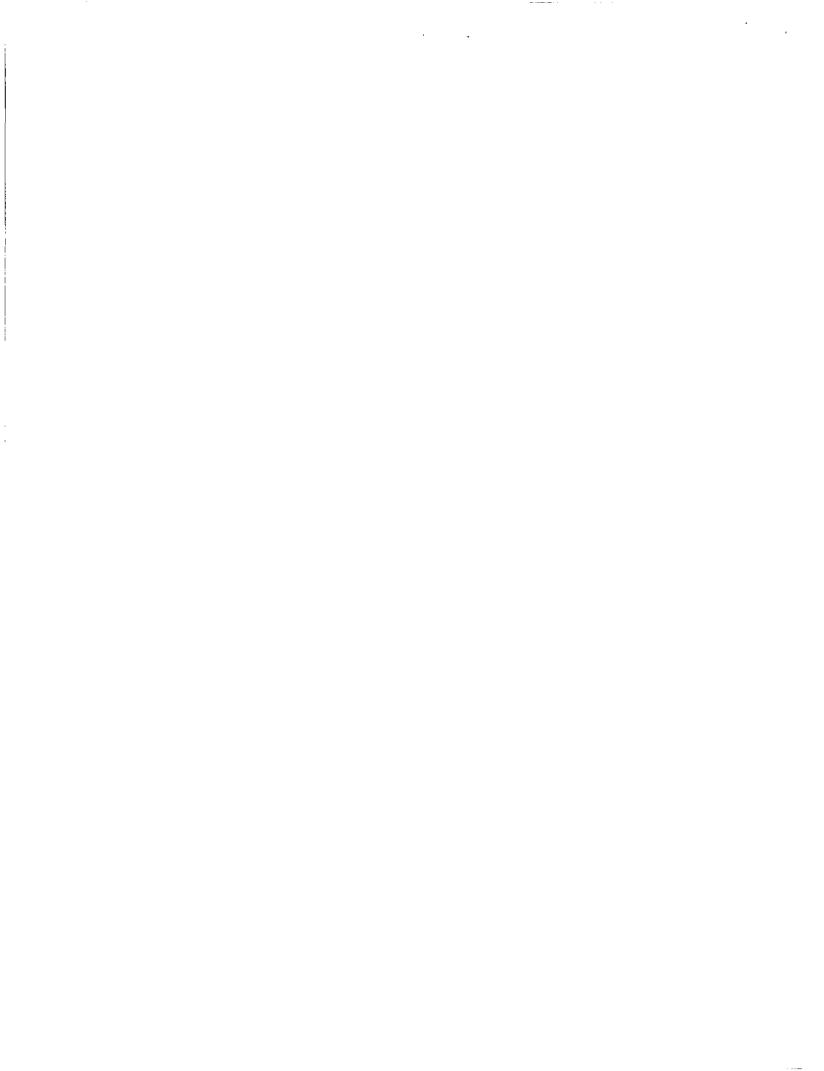
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FORM GM ASSISTA MARKON BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR U.S. ENVIRONMENTAL ENTER: PROTECTION AGENCY US ATTURE DE CHARLOTTE NO ATTUR SITE NAME: 1997 Hazardous Waste Report A.C. St., P. SEC INICIDI 1918, 6, 212, 7, 1915, 7, EPA ID NO: WASTE GENERATION FORM AND MANAGEMENT GM 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. A. Waste description (page 12) 17.77 PETROLEUM NAPHTHA -B. EPA hazardous waste code DOISH DOIGHT C. State hazardous waste code (page 13) (page 12) D1010181 Do: 40: D. SIC code F. Source code G. Point of H. Form code L RCRA-radioactive mixed E. Origin code ; (page 13) (page 14)measurement (Pa⊊e 14) (page 14) (page 13) System Type (0.14)12 0 12 1 والالحوق լի F#T I E I A. Quantity generated in 1997 Sec. II C. Old this site do any of the following to this waster treat on site. S. UOM īΛ [時點] 縣道湖。 (page 15) dispose on site, recycle on site, or tight arge to a sewer/POTW? (page 15) (page 15) 11.0.9.7.6 0 Density LLL C 1 lbs/gal C 2 sq DI 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 Quantity treated, disposed, or recycled On-site process system type Quantity treated, disposed, or recycled (page 16) on site in 1997 (page 16) (page 16) on site 'n 1997 (page 16) M 1 1 [X<u>1 | 1 | 1</u> ٠., Sec. III A. Was any of this waste shipped off site in 1997 for treatment, cisposal, or recycling? (page 17) ♠ 1 Yes (CONTINUE TO BOX 8) = 2 No (FORM IS COMPLETE) ŢĘ, B. EPA ID No. of facility waste was shipped to C. System type 본. Yotal supplify shipped in 1967 (page 17) D. Off-site availability shipped to (p. 17) ##de (page 17) WICID (0.7.9, 0.6,0,0,5,9) 11:0:9:7:6 0 181 144 L 111 B. EPA ID No. of facility waste was shipped to E. Tatal quantity shipped in 1997 (page 17) Site 2 C. System type O. Off-site availability  $T_{i}$ shipped to (p. 17) coc# (page 17) (X) \_\_\_\_( <u>~</u> . . Site 3 B. EPA ID No. of lacility waste was shipped to C. System type D. Off-site availability 量。Tatal quantity shipped in 1997 (page 17) (page 17) shipped to (p. 17) code (page 17) Comments:



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BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR SITE NAME: US AIDLIDUS SOU CHARLOTTE NO ARACE WICIDI (91816) 212171 (91517) EPAID NO:



### U.S. ENVIRONMENTAL PROTECTION AGENCY

1997 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

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S <del>ac</del> . 11	A. Quantity generated in 1997 (page 15)  L. L. L. L. L. L. L. L. L. L. L. L. L. L	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 sewenPOTW7 (page 15)  If 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)  X2 No (SKIP TO SEC. III)
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BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME: US ANDRES ED CHARLOTTE NO ARROR

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U.S. ENVIRONMENTAL PROTECTION AGENCY

1997 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

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D. SIC c (page 13	( Origin code   1   1	F. Source code (page 14) - LAIO 7	G. Point of measurement (p. 14)	H. Form tode (page 14) [3] & O	I, RCRA-radioactive mixed (page 14)
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Site 3	B. EPA ID No. of facility waste was shipped to (page 17)	C. System type shipped to (p. 17)	D. Off-site availab		antity shipped in 1997 (page 17)

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BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME:

5030 HANGAR PD CYARLOTTE NO 27368

EPAID NO: WICIDI (91816) 212171 (91517)



U.S. ENVIRONMENTAL PROTECTION AGENCY

1997 Hazardous Waste Report

FORM **GM** 

⊕. C#-site availability |

다. C#-site availability

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WASTE GENERATION AND MANAGEMENT

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E. Total quantity shipped in 1997 (page 17)

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B. EPA ID No. of facility waste was shipped to

5. EFA ID No. of facility waste was shipped to



BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR U.S. ENVIRONMENTAL PROTECTION AGENCY Min Z SITE NAME: 115 <u>Airunus</u> 1997 Hazardous Waste Report 5000 HANGAR BY CHARLETTE NO 29008 WICODI 9816 227 195171 EPA ID NO: WASTE GENERATION FORM AND MANAGEMENT <u>;</u> **GM** 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. A. Waste description (page 12) あり SPENT CHEMICAL OXYGEN GENERATORS C. State hazárdous weste code (page 13) 1200015 L1 L1 B. EFA hazzrdous waste code 原元清 (Page 12) Ū. \$i€ cade F. Source code G. Paint of H. Formicade I. RCRA-radioactive mixed 8. Origin code 111 (page 14) (page 13) (page 14) measurement (page 14) 政治公 (sage 13) System Type (p. 14)LA 15 .9: (B:31/16) 峚 £81.1.1.1 Ш Sec. II C. Did this site do any of the following to this waste: treat on site, が開発 A. Quantity generated in 1997 B. UCM dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) (page 15) (page 15) 11/1/00 Density = 1 lbs/gal = 2 sg ± 1 Yes (CONTINUE TO OF-SITE PROCE25 \$1/\$TEM t) 노 2 No (SKIP TO SEC. III) ON-SITE PROCESS SYSTEM 1 ON-SITE PROCESS SYSTEM 2 On-site process system type Quantity treated, disposed, or recycled On-site process system type. Quantity treated, disposed, or recycled. . . on site in 1997 (page 18) (pece 16) on site in 1997 (page 16) (¢a¢e 16) [#1 + | L 11. A. Was any of this weeks shipped off site in 1997 for treatment, dispessif, or recycling? (page 17) ≱1 Yes (CONTAUE TO BOX B) # 2 No (FORM IS COMPLETE) Site 1 3. EPAID No. of faculty waste was shipped to C. System type D. Off-site availability 夏. Total opendry spicope in 1997 (page 17) snicoed to (p. 17) (page 17) code (page [7) <u> [NICIDI 1918] OIT 1421 (132</u> <u>, , , , , , , , /,/ ,0,6, ,0,</u> E. Total guantity snipped in 1997 (page 17) Site 2 B. EPA ID No. of facility Waste was shipped to C. System type D. Off-site availability (page 17) snipped to (p. 17) code (page 17)  $\{M \vdash j \mid j = j \}$ 77.0 B. EPA ID No. of feality waste was shipped to Site 3 C. System type D. Off-site availabuity 生. Total quantity shicged in 1997 (page 17) (page 17) snigged to (p. 17) coda (page 17) (<u>H) [ ] </u> Comments:



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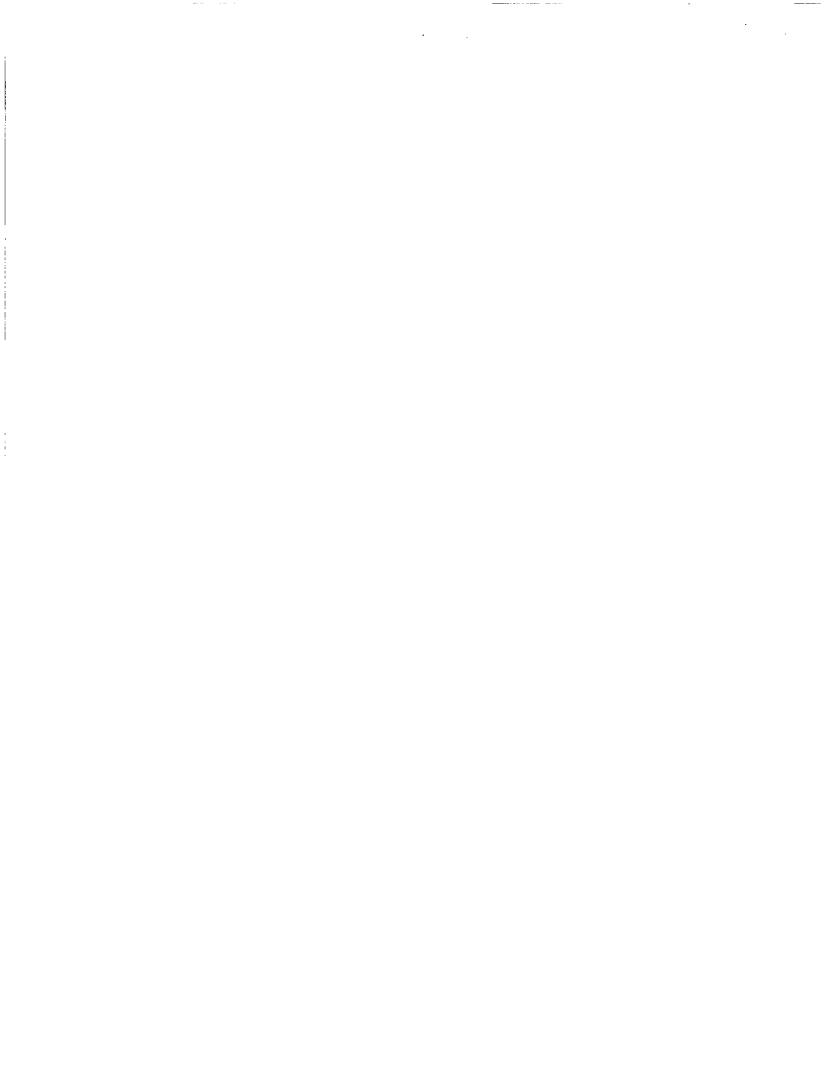
#### U.S. ENVIRONMENTAL PROTECTION AGENCY

1997 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

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المراجعة ال FORM GM ž SEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR U.S. ENVIRONMENTAL ENTER: PROTECTION AGENCY US Airways SITE NAME: 1997 Hazardous Waste Report 5620 HANGAR PD CHAPLETTE NO 2330B WICIDI (9816) 212171 1915171 WASTE GENERATION FORM AND MANAGEMENT GM 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. A. Waste description (page 12) , , PHOSPHORIC ACID PINSE WASTE B. EPA hazardous waste code C. State hazardous waste code (page 13)  $\underline{\mathbb{D}}$ (page 12) D. SIC code G. Point of H. Form code 1. RCRA-radioactive stunct E. Origin tode | († F. Source code (page 13) (page 14) (page 14) measurement (cage 14) を対象 (page 13) System Type 14:5.12 (p. 14) $(A_1 + A_2 + A_3)$ (3110151 иZs [25] [ ] A. Quantity generated in 1997 C. Did this site do any of the following to this waste: treat on site, ∋. UQM W. N. Ш (page 15) dispose on site, recycle on site, or discharge to a sawer/POTM? (page 15) (page 15) Density [\_\_\_] 11 12/6/010 0 □ 1 lbs/gal □ 2 sg = 1 Yes (CONTINUE TO ON-SITE PROBESS SYSTEM 1) "XZ No (SKIP TO SEC. III) ON-SITE PROCESS SYSTEM 1 CHISTE PROCESS SYSTEM 2 Cn-site process system type On-site process system type. Quantity treated, disposed, or recycled Quantity treated, disposed, or recycled on site in 1997 (page 16) (tage 16) (##3t 15) on alte in 1997 (page 16) (M) | 1  $\{\underline{M}: 1 = 1, \dots, 1\}$ 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 5) □ 2 No (FORM IS COMPLETE) B. EPA ID No. of facility waste was shipped to 5/(2 ) C. System type 다. Cff-site availability 筆、下otal quantity patesed in 1997 (1979 17). (#8<sub>6</sub>#9\_17) snipped to (p. 17) etcə (paga 17). 1-1 CIDI 191810 18-14-2011 13-21 1 360C O 3. EPA ID No. of lacility waste was snipped to Site 2 E. Total quentry snippled in 1997 (Bage 17) D. Officite availability. G. System tyde '±ago 17) sada (paga 17) snigpēd to (p. 17) F-73 B. EFAID No. of facility waste was shipped to Site 3 Off-site availability. E. Total quantity sniched in 1997 (page 17). C. System type shicoed to (p. 17) code (page 17) -4-

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#### NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

JAMES B. HUNT JR. GOVERNOR

March 28, 2000

SHORT FORM COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY

DOCKET # 2000-081

BILL HOLMAN SECRETARY

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

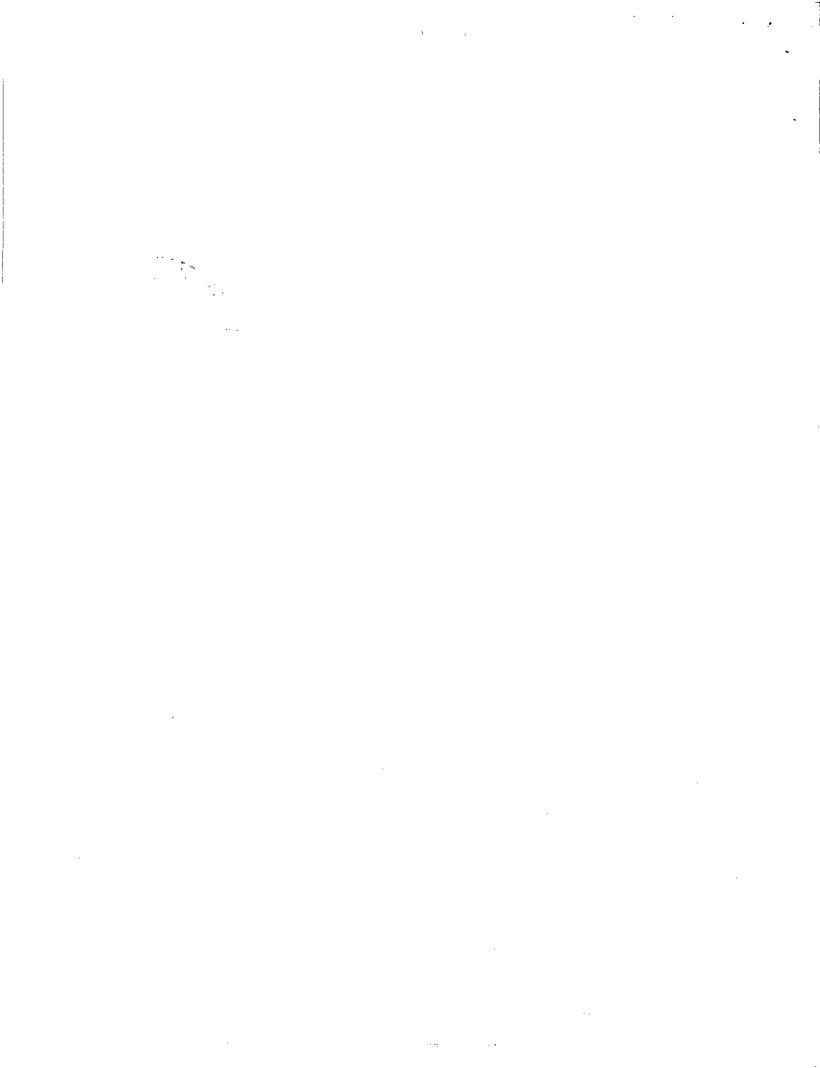
DIRECTOR ...

US Airways, Inc. Re: NCD 986 227 957

Dear Mr. Cookey:

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.

- US Airways is a corporation registered to conduct business in North 1. 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.
- 40 CFR Part 262, adopted by reference at 15A NCAC 13A .0107, contains standards and requirements applicable to generators of hazardous waste.
- 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



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):

- 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.
- 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 a; 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

- 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.
- 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 Mecklenburg County Health Director

Kris Lippert, EPA Region 4

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.

Bv:

William L. Meyer, Director Division of Waste Management

Date: 3/29/01

# 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 Zo day of March, 2000.

William & Meyer

William L. Meyer, Director

Division of Waste Management

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

Name/ID: <u>US Airways/NCD 986 227 957</u>
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)
Quantity of waste involved_4-55-gallon containers
2. Toxicity of waste involved <u>D001, D007, F001, F002, F003, F004, F005</u>
3. Is human life or health potentially threatened? yes X no
Distance to residences 2 miles east of the facility
Number of people involved 1500 employees
Media for exposure: air $\underline{X}$ groundwater $\underline{J}$ surface water $\underline{J}$ direct contact $\underline{X}$
4. Are other organisms potentially threatened? yes _ no X
Media for exposure: air X ground water surface water direct contact X
5. Are any environmental media potentially threatened? yes X no_
air X groundwater _ surface water _ soil
6. Is the regulatory program adversely affected? yes X no
Harm Cell: Major X 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 $\underline{\times}$ significant $\underline{-}$ in compliance except for cited violation $\underline{-}$
Deviation cell: Major x 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: \$ 1,000,00 to \$ 5,500.00
Penalty amount chosen: \$ 2,750.00
Per Week Assessment: \$
Remarks: \$2,750,00 was chosen as the penalty amount due to the potential adverse effect
US Airways is imposing on its employees and the environment by storing hazardous waste in

containers that are not closed.

US Airways, Inc. NCD 986 227 957 Docket #2000-081

# Part III. Penalty Adjustment (optional)

	Per	centage change	Dollar Amount
1.	Good faith efforts to comply/ lack of good faith:		
2.	Degree of willfulness/neglect:		
3.	History of noncompliance/		<del></del>
	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>
5. 6. 7,	Adjusted per-week penalty (amount fi	rom Part II)	
7,	Number of weeks of violation		
8.	Multi-week penalty (line 6 x line 7)		
9.	Economic benefit of noncompliance ( worksheet)	attach separate	
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)	
Rem	arks:		
Com	pliance History : A 25% was adde	d due to the fact t	that US Airways was cited for not
<u>keepir</u>	<u>io containers closed in an NOV dated 1</u>	1/3 <u>0/99.Docket #</u>	2000-037.
Signer	i vinj	Date: 3/28	1/20
_,=,		—	

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

	<u>US Airways/NCD 986 227 957</u>
Regulatio	n Violated: 40 CFR 262.41(a), adopted by reference at 15A NCAC 13A .0107
Parf I. De 1. Qua 2. Tox 3. Is he Dist Num Med 4. Are Med 5. Are air_	gree or Extent of Harm (actual or potential) antity of waste involved unknown icity of waste involved D001, D007, F001, F002, F003, F004, F005 uman life or health potentially threatened? yes X no ance to residences 2 miles east of the facility aber of people involved 1500 employees dia for exposure: air groundwater surface water direct contact other organisms potentially threatened? yes no dia for exposure: air ground water surface water direct contact any environmental media potentially threatened? yes no groundwater surface water soil er regulatory program adversely affected? yes X no
Harm Cel	l: Major _ Moderate Minorx
	US Airways failed to submit its blennial report for 1997.
	Part II. Deviation from Regulations
	se of noncompliance with overall regulations: intial $\underline{x}$ significant $\underline{\ }$ in compliance except for cited violation $\underline{\ }$
Deviation	cell: Major <u>x</u> Moderate Minor
<u>13A .0107. ı</u>	: 40 CFR 262.41(a) adopted by reference as adopted by reference at 15A NCAC requires a generator, who ships any hazardous waste off-site to a treatment.

MATRIX CELL RANGE: \$100.00 to \$660.00

Biennial Report by March 1 of each even numbered year.

Penalty amount chosen:

\$660.00

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:		
2. 3.	History of noncompliance/		
	compliance;	<u>+50%</u>	\$ <u>300.00</u>
4.	Other unique factors:		
4. 5,	Adjusted initial penalty (amount fi	om Part II	\$ <u>600,00</u>
5. 7.	Adjusted per-day penalty (amour	t from Part II)	
7.	Number of days of violation		
₿.	Multi-day penalty (line 6 x line 7)		
∋.	Economic benefit of noncompliar worksheet)	ce (attach separate	
10.	Total (lines 5 + 8 + 9)		
11.	Ability to pay adjustment		
12.	Total Penalty Amount:		\$ <u>900.00</u>
	(may not exceed \$25,000 per day	y of violation)	

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

Compliance History:

Signed: WSM

Date: 3/28/0)





# NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

ASHEVILLE REGIONAL OFFICE

Division of Waste Management Hazardous Waste Section

February 2, 2000

JAMES B. HUNT JR. GOVERNOR

WAYNE MCDEVITT SECRETARY

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**Memorandum** 

To: Doug Holyfield

Compliance Branch Head Hazardous Waste Section

From:

Jesse W. Wells 4

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.

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	Submittal Information	Initial By- D	ate -	Corrected By- Date -
FACILITY INFORMATION:	RCRA Comp.		,	(
EPA ID Number:	Section:	<del> </del>	.//	/ <u>-</u> / `
NIC10191816121217191517	Received: Entered/	<del>_</del>		
	Returned:		<u>-//                               </u>	
Facility Name: MS AIRWA	<u>/</u> S	. C	ity: <u></u>	HAPLOTTÉ
EVALUATION DATA: New:		/ Delete		: Required)
Agency: Mo. Date	2 00	Type:  C E E   C S E	Con Dat	trol Numbera Entry Personnel
Evaluation Comments: (74) 1 : Hekei NOV /3	su <del>co = Dock</del> .	er#2000	037	
2 = FACILITY NOT IN CO	MOLLANCE WITH N	OV DOCKET#20C	0-827	
SNC DETERMINATION: If this fill in this block. (NOTE: The SNY/SNN evaluation car	s evaluation SNC determ a also be su	resulted : inations a bmitted la	in a SNC re SNY/S ter on a	determination, NN evaluations. separate form.)
Facility is (Check one a SNC (SNY evaluation		<i>/</i> .		ination:
or- - no longer a SNC (SNN		Same as above ev	a).:	- or -
VIOLATION DATA: New: #	•		ete:	
# Agency: SI Type: 61P	= <del>-</del> -	idy) I/I/I	/ 3101/	
Priority: Branch: Return	Oll Pers	on: 10219	19101112 N	Data Entry)
Reg. 15  R  Domplia:		016 / 019	100 M	- Actual  / [8/0] / [0]0]
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#2 Agency: S Type: 61P		<del>-</del>	711217171	class:
Priority:   Branch:	Dete (n Determi	`	\$5728g	Data Entry)
Complia Complia	to Sçi	ol6     O o	   0	- Actual
/	ription (30)		34(n)(4) 1	
Comment (72): No ANNUM	<del></del>	ducted for	5 emplox	
#3 Agency:   S   Type:   G P	Dereina		/ <u>  3 0 </u>  /   <u> </u> 5	G  G  Class:
Priority: Branch: Return	12 1	on: <u>0219</u>	J Ni	mber
Return . Complie Reg. <u>[SIR]</u> Reg. Desc	nce: [0]/]/[	0161/0101	[0]1 2.34/a)/4	1/12/01/10/09/W ) ref 40 CFR 265.31
Comment (72): <u>Releases</u>	of hazardou	•		ONTAINERS IN COMPLIANCE

\*\*\* 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: Dat	e: Month	Day Year	Seg.# (Data Entry)
Person: Branch: Penalty Data		l. Prev.	
Proposed:   ]	Payme	ents:	Date Paid:
\$ 1 1 1 1 1 1 1 1 1	\$ [ ] ]		
Enforcement Comments: 1: Hoker A	<del>⊬.1350.e0</del> -	DOLKET A 30	<del>90-037</del>
2 = Facility NOT in	COMPLIANCE	WITH NOV DOCKET	1 2000-037
. Cite violations ad	ldressed h	y this action	n below -
VIOLATION DATA: New:		Change: _/_	Delete:
Agency: S Type: 6:PIT	Date (1 Determ	ned: [/#/]/[	Seg. (Data Entry)
Priority: Branch: 0	/Pers	10121/	Number
Reg. SR Reg. Descrip	==  0 1 /	neduled   <u>0 0 <sup>/</sup> 0 0 </u> ): <u>40</u>	
Comment (72): 13 Swellik 4	, ,	n conformer we	REPEAT
#3 Agency: S Type: 6/R/R			3101/1919 Class:
Priority: Branch: 0	/ Per		Seg. (Data Entry) Number
Return to Compliance	Sci               : =	neduled  0 6 / 0 0	Actual
Type: DIA Reg! Descrip			REPEAT
	Pheir Most		WI KEPORT. ONS A-D. WOLATION
Agency: Type: [   1 ]	Date (1 Determ	ined:	Seg. (Data Entry)
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Reg. Compliance Type: Reg. Descri		<u>                                     </u>	
Comment (72):			
#_ Agency: Type:	Date (1 Determ	mdy) ined: //	Class: Seg. (Data Entry)
Priority: Branch: Estura to	!	son:	Number
Return to Compliance Reg.     Reg. Descrip	≅: <u> </u>		
Comment (72):			

Yes

\*\*\* 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:	Month D	ay Year	Seg.# (Data Entry)
Person: Branch: Penalty Data	Firs Wess	ures:	
Proposed:  \$	1) Paymen 5	ts: 	Date Paid:
\$ 1 1 1 1 1 1 1 1 1	\$		
Enforcement Comments: 1: //ckbr- (74)	Adv 135000	Dm.Key # 2000	9 <del></del>
2: Facility No	TIN COMPLIANCE W	14 NOV DOCKET &	2000-037
Cite violations	s <b>addresse</b> d by	this action	below -
VIOLATION DATA: New:		Change: 1/	Delete:
Agency: S Type: 6	Date (md	Yd: 1/1/1/13	ol/1919 Class:   Seg. (Data Entry)
Priority: Branch: Return		on: [0]2]9]	Number
Reg. [5 [K] Reg. Des	ence: <u>[0]/[0</u> cription (30):	16 / 00 0 1 40 CFR 762.341	(c)(,)(i) 1ef. 40 CFR 265,173(a
Comment (72): 1.3 Safe//	le accumulation	conformer were	OBSEINED OPEN. NICLATION
#5 Agency: 5 Type: 61	ZIRI Date (mo Determin	¥à: <u>V1/</u> 1/ <u>13</u>	101/1919 Class:   Sec. (Data Entry)
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Comment (72):			

Submittal Initial Corrected Information By- Date - By- Date -
FACILITY INFORMATION:   RCRA COMD.
EPA ID Number: Section:
WICID191816121217191517   Received:
Returned:
Facility Name: #S: AIRWAYS City: CHARLOTTE
EVALUATION DATA: New: 🛩 Change: 🗸 Delete: ( === : Required)
Agency: Mo. Day Year Type: Control Number   S  Date:
Evaluation Comments: (74) 1: Hekef NOV 735460 - Docker # 2000-037
2 : FACILITY NOT IN COMPLIANCE WITH NOV DOCKET # 2000-837
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 leter on a separate form.)
Facility is (Check one)  Date of determination:
or no longer a SNC (SNN eval.) - above eval.: - / / /
VIOLATION DATA: New: Change: V Delete:
# Agency: S Type: 61PIT Date (mdy) 111 / 310 / 1919 Class: Determined: 111 / 310 / 1919 Class:
Priority: Branch: Of Person: O219 00 112 Seq. (Data Entry)  Return to Scheduled Acqual
Reg.  5 R  Reg. Description (30): 40 CFR 262.34(800) 00 (100)
COMMENT (72): FACILIAN NOT CONDUCTING WEEKIN THE SPICE STANCE
#2 Agency: SI Type: [6 P T] Date (mdy) [/ X 6 3 D]/19191 Class:
Priority:   Branch:
Return to Scheduled Actual
Reg.   S R  Reg. Description (30): 40 CFR 262 34(a)(4) ref. 40 CFR 265.16(c)
Comment (72): No ANNUAL TRAINING CONDUCTED FOR 5 employers. IN COMPHINE
#3 Agency:  S  Type:  GIP T  Date (mdy)
Priority:   Branch:  0 1  Person:  0 2 9  Number
Return to Scheduled Actual
Reg.   SIR   Reg. Description (30): 40 CFR Z62.34/a)(4) ref. 40 CFR Z63.31

# PENALTY COMPUTATION CERCELIST

Facil:	ity Name/ID:	US AIRWAY	15 1	JCD 986	227 957	
ADDRE!	ss: <u>5020</u>	HANGAR ROAD,	CHARLOTTE	N.C. 7	8219	,
1. 1	: Number of empl	oyees at the	facility	. 150	o employees	
2. 1	Number of resi	dents in the	area of	the faci	lity.	UNKNOWN
3. 1	Distance to re	esidents.	Approx.	? miles	[A12 poor	Duke - EAST of FACIL
4. 1	Source of faci	lity's potab	le water	supply.	MUNIC	ipal
5. 5	Source of pota industries in	ble water sug the area of	pply for the facil	resident	s and/or	other
	List all viola 40CFR 262-34(c)(j	_		cility:		
7 (	40 CFR 262.40 (a)					
<i></i>		······································		<del></del> -	<del></del>	
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,		<del></del>	<u>.</u> .	<u>.                                    </u>	<del></del>	
-		<del></del>				

(OVER)

# SPECIFIC VIOLATION(S)

1. Unit(s) involved. Four field Contributes of Harakous waste.  2. Type of waste (waste code and constituents) FOUS FOUS FOUS DOIN 1007 FOUS FOUS DOIN 1007 FOUS FOUS FOUS FOUS FOUS FOUS FOUS FOUS	Regu	ulation violated: 40 CFR 7	62.34(c)(i)(i) ref. 40 CFR Z68.173(a)
2. Type of waste (waste code and constituents)   1003   1005   1006,   1005   1006,   1005   1006,   1005   1006,   1006   1006,   1006	_		
Squarity of waste 4.55 gallor contentes.  Describe area in which violation occured. 3-55 gallor contents, were horse or the HAV 1 AREA and 1-55 gallor contents was horse or the HAV 1 AREA and 1-55 gallor contents was horse or the part of the found support Area.  Specifics of violation. The hire contents that is found at the contents that is found in the part of th	2.	Type of waste (waste code	and constituents) FOO2 FOO3 FOO5 DOOL
2. Quantity of waste 4.55 sellow contends. 3-55 and contends were borned in the violation occurred. 3-55 and contends were borned in the plant of the formed support which were borned in the plant of the formed support which were borned in the plant of violation. At this contends were borned in the flant with the last the last of the flant of with the violation and the contends with its violation may have upoper passed in the contends of the support of the flant of the flant of impacted the environment(e.g. discolored soil, odors, etc.)  7. Date violation occurred? Thinks Not. 30,1999 - EPRONT Than See Section Date(s) of past violation? Not. 30, 1999 - NOT DATE of the plant of the flant of this violation in past? yes to Date(s) of past violation? Not. 30, 1999 - NOT DATE of the past of the plant of the past of t		0007 DOIB DO35, DA39, DO40, UZZ	.6.
**Note in the Park of the followed symbol Auto.  **Specifies of violation.** All this ordered into the Bay of the pure observed with the register of violation. All this ordered which, the Bay of the pure observed with the register of the carbane mind in Cole man observed with the left the facet in the register of the register of the carbane mind in Cole man observed with the left the facet in impacted the environment (e.g. discolored soil, odors, etc.)  **Describes of Continues are conserved classes of the violation and have applying classes.  **Date violation occurred?** Thindly NOV. 30,1939 ** Repeat - Tam. 20, 2000  **E. Ras facility been cited for this violation in past? yes to Date(s) of past violation? And 30, 1939 ** NOV. 100.000 ** Tam. 10, 1934 **  **Market of the Politics of this violation in past? yes to Date(s) of past violation? In 18, 10, 1939 ** NOV. 100.000 ** NOV.	З.		
Specifics of violation. An how combine hold in the Bay's deep were pissed with the real table of violation. An how combines hold in the Bay's deep were pissed with the real table of the combines hold in the land in the real table of the real table of the combines and the combines and the combines and the combines and the combines and the combines and the combines and control of the second and have appeared the environment(e.g. discolored soil, odors, etc.)  7. Date violation occurred? Thinkly NOV.30,1979 Expan - Tan. 20, 2000  8. Eas facility been cited for this violation in past? yes who was a part of the combines of past violation? And 10.30,1979 AND AND COLOR 1500 COLO. The color of the color of	4.	Describe area in which vio	lation occured. 3-55 get Contrivers were
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	₽.		

# SPECIFIC VIOLATION (S)

Recui	lation violated: 40 CFR 262.34(c)(i)(i) sef. 40 CFR 265.173(a)
1.	Unit (s) involved. FOUR OPEN CONTRINENS OF HALAROMS WASTE
2.	Type of waste (waste code and constituents) FOO3 FOO3 FOO5 DOOL
	DODT DOIS DO35, DA39, DO40, UZZ6.
3.	Quantity of waste 4-55 gallow containers
4.	Describe area in which violation occured. 3-55 gpd. Contrainers were
	NOTED IN the BAY 3 AREA and 1-55 gallow consumer was noted in the
-	print BOOTH area of the Ground Support AREA.
5.	Specifics of violation. The three continues Noted, of the Bay 3 Aren were observed
_	with the ring locks not societed and the container noted in GSE was observed with the lid of the finance in
6.	Readily observable evidence indicating this violation may have were not post
	impacted the environment(e.g. discolored soil, odors, etc.)
	Observations of containers not properly closed.
7.	Date violation occurred? Titally Nov. 30,1999 - Repeat - Jan. 20 2000
8.	Date violation occurred? <u>Tailally Nov. 30,1999 - Repear - Jan. 20, 2000</u> Has facility been cited for this violation in past? yes v no
ь.	Date(s) of past violation? Nov. 30, 1999 - Nov. DOCKET # 2000 - 037 JAN. 10, 1994-
	MON DOCKET # 94-074
	190V BOOKET 47 17-017
Remi	lation violated: 40 CFR 162.40 (a)
1.	Unit(s) involved. 1998 BRNNIN REPORT
2.	Type of waste (waste code and constituents) VARIOUS- Nicholes DOO/
	DOOD DOOS DOOL DOOT COOR DOIS DOST FOOD FOOD, FOOD, 4276
З.	Quantity of waste UNKNOWN - All HOZ WASTE SOMBRATED IN 1997
4.	Describe area in which violation occured. The facility failed to
	Submit their 1998 hAZArdons WASTE bildWIAT FEDORT, The report would
	document the grantity of haz waste generated in 1997.
5.	Specifics of violation. Quant the inspection to cary of the brending report
	could be produced, Applethon the STATE OR USEPA ROGION SE INAN a copy.
6.	Readily observable evidence indicating this violation may have
	impacted the environment (e.g. discolored soil, odors, etc.)
_	
7.	Date violation occurred? (INV. 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
	9_11 2_9_1.3
	lation violated:
1.	Unit(s) involved.
2.	Type of waste (waste code and constituents)
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6.	Readily observable evidence indicating this violation may have
	impacted the environment (e.g. discolored soil, odors, etc.)
7.	Date violation occurred?
8.	Has farility been cited for this violation in past? yes no
	Date(s) of past violation?

# PENALTY COMPUTATION CHECKLIST

Facil	Hame/ID: US AIRWAYS NCO 986 227 957
ADDRI	SS: SOZO MANGAR ROAD, CHARLOTTE, N.C. 28219
1.	Number of employees at the facility. 1500 Employees
2.	Number of residents in the area of the facility. WKNON
3.	Distance to residents. Applet 2 miles (Amplet Days)-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
6. /.	List all violations found at the facility:  40 CFR 767-34(c)(i)(i) ref. 40 CFR 765.173(a)
Z.	40 CFR 262.40 (a)
	<del></del>

(OVER)

# RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: US AIRWAYS 5020 Hangar Road, Charlotte, N.C. 28219 Location: 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, Type of Inspection: <u>CSE</u> Status: LOG Inspector(s): Joseph Parker - DENR Hazardous Waste Section Present at Inspection: <u>Dennis Watson - US AIRWAYS, Leigh Kiser -</u> 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 Approved Transporters ? ves Approved TSDF ? ves Manifests: Filled Out Correctly ? <u>ves</u> Signed Copies ? <u>yes \*</u> LDR Notification Attached ? ves The facility's 1999 and 1998 hazardous waste manifests were

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: <u>US AIRWAYS</u> EPA ID#: NCD 986 227 957 Inspection Date: Jan. 20, 2000 Safety-Kleen Systems, Inc. - ILD 984 908 202 Transporters: 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 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 <u>Compliance</u> 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,

Training Records:

Certified Training Documents Available? <u>Yes</u>
New Employees Since Last Inspection? <u>Yes, all new employees are</u>
trained within one month of their hire date.

Contingency Plan Implemented? <u>No</u> (If yes, was it adequate?) Agreements with Emergency Responders? <u>Yes, documentation provided</u>

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Page Three - RCRA Inspection Report

Facility Name: <u>US AIRWAYS</u>

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? <u>The facility has fire extinguishers throughout the facility with fire hoses.</u>

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

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Page Four - RCRA Inspection Report Facility Name: <u>US AIRWAYS</u> Inspection Date: Jan. 20, 2000 EPA ID#: NCD 986 227 957 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? <u>Yes</u> 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. 1-55 gallon container holding hazardous Waste Stream 4 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 During the reinspection secured. 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 During the reinspection secured. 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.

VIOLATION.

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Facility Name: <u>US AIRWAYS</u>

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.

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Facility Name: US AIRWAYS

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

#### 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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Page Seven - RCRA Inspection Report Facility Name: <u>US AIRWAYS</u> 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? <u>Yes</u> < 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. Closed? <u>yes</u> Aisle Space? <u>yes</u> Labeled? <u>yes</u>
Dated? <u>yes</u> Evidence of Release? <u>none observed</u> Containers: < 90 Days? <u>ves</u> Good Condition? <u>yes</u> 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.

 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: <u>US AIRWAYS</u>

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:

 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: <u>US AIRWAYS</u>

EPA ID#: NCD 986 227 957 \_\_\_\_ Inspection Date: <u>Jan. 20, 2000</u>

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.

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 resubmit 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.

In apector

(Date)

(Date)

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## **■ U·S AIRWAYS**

### 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.

LK/rw

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## **■ U·S AIRWAYS**

## 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, anached is a copy of recent state hazardous waste inspection of our Charlotte facilities. Please not 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.

Teigh Kiser

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#### 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

EPA ID#: NCD 986 227 957

WAYNE MCDEVITT SECRETARY

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**

#### 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.

#### 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 ATRWAYS 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)

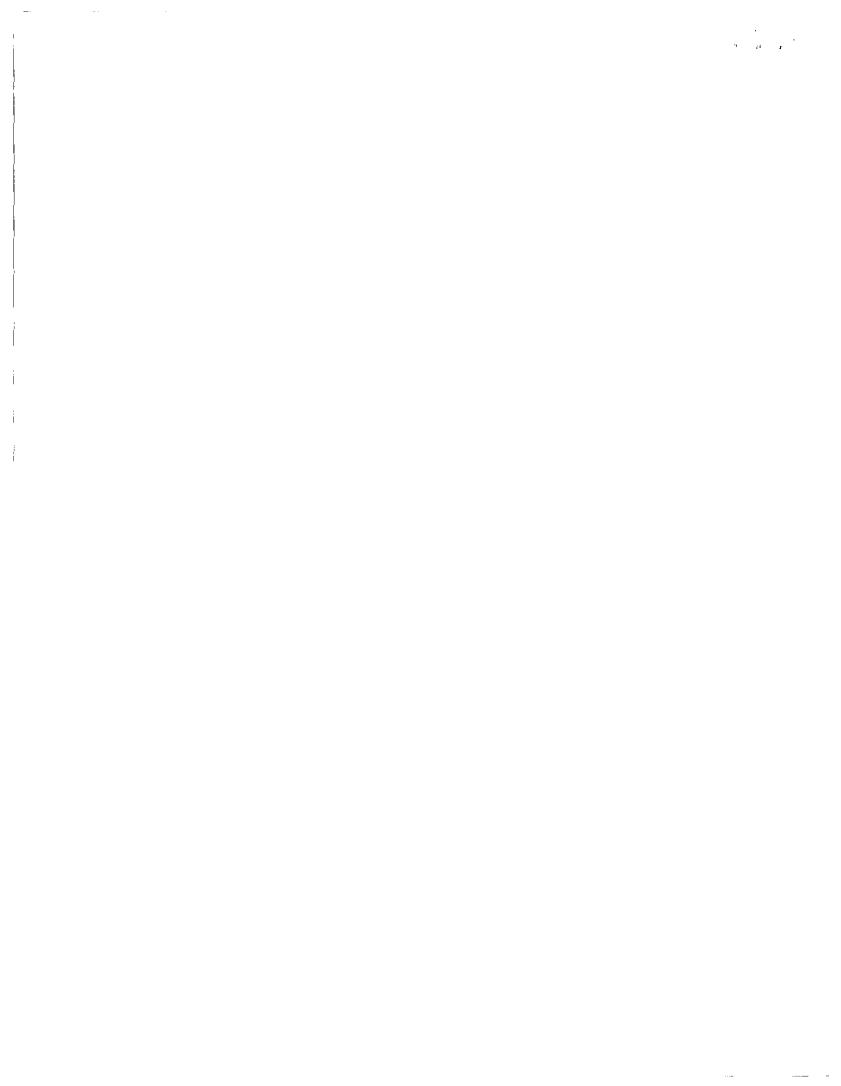
A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

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) 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.

(Recipient Signature)

cc: Jesse Wells central files

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#### RCRA INSPECTION REPORT

x = violation noted na = not applicable

Facility Name: US AIRWAYS 5020 Hangar Road, Charlotte, N.C. 28219 Mailing Address: P.O. Box 19368, Charlotte, N.C. 28219 Phone Number: (704) 359-2018 -EPA ID#: NCD 986 227 957 Contact/Title: Tim Cooksey, Dennis Watson Inspection Date: Nov. 38, 1999 Last Inspection: Jan. 8, 1998 \_\_\_\_\_ Type of Inspection: <u>CEI</u> Status: <u>LOG</u> Inspector(s): Joseph Parker - DENR Hazardous Waste Section Present at Inspection: <u>Dennis Watson - US AIRWAYS, Virgil</u> Misenheimer - US ATRWAYS, Tim Cooksey - US ATRWAYS, Bill Wheeler -US AIRWAYS Type of Business: <u>US AIRWAYS operates an aircraft maintenance</u> 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 Approved Transporters ? ves Approved TSDF ? ves Filled Out Correctly ? ves Signed Copies ? ves \* LDR Notification Attached ? ves Manifests: 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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Page Two - RCRA Inspection Report Facility Name: <u>US\_AIRWAYS</u> EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997 Safety-Kleen Systems, Inc. - ILD 984 908 202 Transporters: 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? <u>No</u> (If yes, was it adequate?)
Agreements with Emergency Responders? <u>Yes, documentation provided</u> 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.

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Page Three - RCRA Inspection Report Facility Name: <u>US AIRWAYS</u> Inspection Date: July 24, 1997 EPA ID#: NCD 986 227 957 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 walkietalkies. 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: <u>The facility has spill response carts</u> 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? <u>Annually</u> 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. 1-55 gallon container holding hazardous Waste Stream 4 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

secured.

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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.

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Page Five - RCRA Inspection Report

Facility Name: <u>US AIRWAYS</u>

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 wa

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	Identifi	i <b>ed?</b> Yes	š

< 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? <u>yes</u> Aisle Space? <u>yes</u> Labeled? <u>yes</u>

Dated? <u>yes</u> Evidence of Release? <u>none observed</u>

< 90 Days? <u>yes</u> Good Condition? <u>yes</u>

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Page Six - RCRA Inspection Report

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 werenoted 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 repacked 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 (Date)	CENTIFIED MAIL) Facility Contact	(Date)
Follow Up Inspection:		
Comments:		
Inspector (Date)	Facility Contact	(Date)

N 64 8

Region 4 Compliance Data Entry Form - Side -	(Rev. 8/97)	
Submittal Initial Information By- Date -	Corrected By- Date -	
FACILITY INFORMATION: RCRA Comp. Section: //	1 . ,	
EPA ID Number: Received: //	/-/- /	
NICID191816 2 2 7 9 5 7  Entered		
Facility Name: <u>U.S. AIRWAYS</u> City: <u>C</u>	HARLOTTE	
EVALUATION DATA: New: 📈 Change: Delete: (	=== : Required)	
Agency: Mo. Day Year Type: Con Dat [J] Date: J/J/3101/1919 CELT Dat L.]  Person: [0 2 9] Reason: []	trol Numbera Entry Personnel	
	·	
Evaluation Comments: (74) 1: INCRET NOV ISSUED - DOCKET # 2000 - 037	•	
SNC DETERMINATION: If this evaluation resulted in a SNC fill in this block. (NOTE: SNC determinations are SNY/STATE SNY/SNN evaluation can also be submitted tater on a	NN evaluations.     separate form.)	
Facility is (Check one)  - a SNC (SNY evaluation)  OI-	dination:	
- no longer a SNC (SNN eval.) - active eval.:	- or -	
VIOLATION DATA: New: Change: Delete:		
# Agency: S Type: 6/PIT Date (mdy) Date (13/0)	919] Class:	
Priority: Branch: 1011 Person: 10219	eq. (Data Entry)	
Reg. 14181 Compliance: [0]/[0]6]/[0]0] ] ]	Actual	
The state of the s	ef. 40 CFR 763, 179	
Comment (72): FACILITY NOT CONDUCTING WEEKIN INSPICTION		
#2 Agency: S Type: 61P1+1 Date (mdy) 1/1/1/13101/1	919 Class: 32 Cl	
Return to Scheduled	- Actual	
Reg.   S R  Reg. Description (30): 40 CFR 262.34(a)(4)	ef. 40 CFR 265.16(c)	
Comment (72): No ANNUAL TRAINING conducted for 5 employ	ers	
#3 Agency: [S] Type: [GIPIT] Date (mdy) [/1/]/[310]/		
Priority: Branch: OII Person: O219 No Return to Scheduled	eq. (Data Entry) umber [	
Reg.   5 R  Reg. Description (30): 40 CFR 762.34 (a)(4)		
	on tainees	

\*\*\* 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: Month Day Year  Date:	Seq. # (Data Entry)
Person:   Branch:   Poll. Prev.     Penalty Data   Measures:	
Proposed:	Date Paid:
Settled/Final: 2) \$[	
Enforcement Comments: 1: <u>licker Nov issueo - Docker # 2000-</u> (74)	- 037
· 2:	
Cite violations addressed by this action h	pelow -
VIOLATION DATA: New: Change:	Delete:
Agency: S Type: 16:PIT Date (mdy) 1/1/1/13'	Sec. (Data Entry)
Priority: Branch: 011 Person: 0219 Return to +- Scheduled	Number
Reg. [5 [R] Reg. Description (30): 40 CFR 762.34(c)	
Comment (72): 1.3 safellite accumulation containen were	observed open.
#5 Agency: 5 Type: 6-1818 Date (mdy) 1/1/310	O / [9] Class: Sec. (Data Entry)
Priority: Branch: 0// Person: 0/219	Number
Return to Scheduled Compliance: 0// 0/6 / 0/0   Reg. Description (30): 40 CFR 267.40	Actual
Type: OTA Reg. Description (30): 40 CFR 262.4.  Comment (72): No copy of Phos Most recover Bienwick	, -
#_ Agency:     Type:       Date (mdy)         /	n/m   m Class:m m
Priority:   Branch:     Person:	Seg. (Data Entry) Number
Return to Scheduled	Actual
Reg Compliance://	
Comment (72):	
#_ Agency: Type:     Date (mdy)     /     Determined:       /	Class: Seq. (Data Entry)
Priority: Branch: Person:	Number
Reg. Reg. Description (30):	
Comment (72):	

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\*\*\* 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) Seq.# (Data Entry) Agency: Month Day Type: Year Date: | | / | / | Ţ Person: | | | Poll. Prev. Branch: 1 Measures: Penalty Data Date Paid: Proposed: Payments: 2) Settled/Final: Enforcement Comments: (74) 1: SICKET NOV 155460-DOCKET # 2000-037 Cite violations addressed by this action below -VIOLATION DATA: New: Delete: Change: Agency: S Type: 6 PIT 1/1/1/13:01/19191 Date (mdy) Determinēd: Seq. (Data Entry) Priority: | Number -Branch: 1011 12 Person: 10/2/9/ -- Scheduled Actual Return to Compliance: |0|1|/|0|6|/|0|0| Type: UR Reg. Description (30): 40 CFR 762.34 safellife accumulation container Comment (72): 13 #5 Agency: ||S|| Type: Date (mdy) Determined: 1/1/1/13/01/19/91 Sea. (Data Entry) Priority: | Branch: |01/\_ Person: |0|219] Number Actual -- Scheduled Compliance: |0|1 / 016 / 010 Reg. ISIR Reg. Description (30): 40 Comment (72): No copy of Sheir Agency: || || Type: Date (mdy) Determined: Seq. (Data Entry) Priority:, ; Branch: | | Person: 4 Number Return to - Scheduled Compliance: 1 1/1Reg. Type: L Reg. Description (30): Comment (72): yderch: || Date (mdy) Determined: Type: Class: [ (Data Entry) Seq. Priority: | | Branch: | | Person: Number -- Scheduled -Actual Return to Compliance: 11/11/1 Reg. Description (30): Comment (72):

More violations for this enforcement action on other side ? Y€⊆ ΝΦ

Region 4 Compliance Data Entry Form - Si.
Submittel Initial Lourected Information By- Date - By- Date -
FACILITY INFORMATION: RCRA Comp. Section:
EPA ID Number:  Received:
NCD986227957 Entered:
Facility Name: <u>U.S. AIRWAYS</u> City: <u>CHARLOTTE</u>
EVALUATION DATA: New: V Change: Delete: ( === : Required)
Agency: Mo. Day Year Type: Control Number Data Entry Personnel
Person:  0 2 9  Reason:
Evaluation Comments: (74) 1: Incket NOV ISSUED - DOCKET # 2000 - 037 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) or- SNC (SNY evaluation) - or -
- no longer a SNC (SNN eval.) a te evel.://
VIOLATION DATA: New: Change: Devete:
# Agency: [S] Type: [GIPIT] Date (mdy) [3] /[3]0]/[9]9] Class: []
Priority:   Branch:  0   Person:  0 2 19   Number
Return to Scheduled Actual
Reg. 15 18 1 Compliance: 01/1/016/010 11/11/11
#2 Agency: S Type: 6/P/T Date (mdy) ////////////////////////////////////
Priority: Branch: 611 Person: 0219 Number
Return to Scheduled Actual   Compliance:  0 / / 0 6 / 0 0       /
Reg.   S R   Reg. Description (30): 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c)
Comment (72): No ANNUAL FRAINING conducted for 5 employees.
Agency:  S  Type:  G P T  Date (mdy)
Priority: Branch: Old Person: O219 Number
Reg.   5 R  Reg. Description (30): 40 CFR 762.34(a)(4) ref. 40 CFR 265.31
Comment (72): Releases of hazardous waste on 2 containers

# NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES MOORESVILLE REGIONAL OFFICE



# Waste Management Division Hazardous Waste Section

#### NOTICE OF VIOLATION

JAMES B. HUNTUR. Governor

To: US AIRWAYS

Docket #: 2000 - 037

5020 Hangar Road Charlotte, N.C. 28219 Insp. Date: Nov. 30, 1999

Facility Type: LQG

EPA ID#: NCD 986 227 957

WAYNE MCDEVITT SECRETARY

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

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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 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 second area, Ground Support Equipment the container. 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. 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) N.G. 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

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### RCRA INSPECTION REPORT

X = VIOLATION NOTED NA = NOT APPLICABLE

Facility Name: US AIRWAYS 5020 Hangar Road, Charlotte, N.C. 28219 Location: Mailing Address: P.O. Box 19368, Charlotte, N.C. 28219 Phone Number: (704) 359-2018 -EPA ID#: NCD 986 227 957 Contact/Title: Tim Cooksey. Dennis Watson Inspection Date: Nov. 8, 1999 Last Inspection: Jan. 8, 1998 \_\_\_\_ Type of Inspection: <u>CEI</u> Status: LOG 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: <u>US AIRWAYS operates an aircraft maintenance</u> 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 Approved Transporters ? <u>yes</u> Approved TSDF ? <u>yes</u> Manifests: Filled Out Correctly ? ves Signed Copies ? ves \* LDR Notification Attached ? ves 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).

corrected.

manifests were faxed by the TSD during the inspection. Violation



Page Two - RCRA Inspection Report Facility Name: <u>US AIRWAYS</u> EPA ID#: NCD 986 227 957 Inspection Date: July 24, 1997 Safety-Kleen Systems, Inc. - ILD 984 908 202 Transporters: 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: <u>US AIRWAYS</u> 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 walkietalkies, 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? <u>Annually</u> All Personnel Handling HW have Access to Alarm/Device? <u>Yes</u> 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 1-55 gallon container holding hazardous Waste Stream 6 waste liquid (D001, D007, F001, F002, F003, F004, F005) - In Compliance. 1-55 gallon container holding hazardous Waste Stream 4 waste solid (F002, D018) - noted as being open, without the ring lock secured. 1-55 gallon container holding hazardous Waste Stream 1 waste liquid (D001, F001, F002) - noted as being open, without the small bung cap secured in the container. 1-55 gallon container holding hazardous Waste Stream 5 waste solid (F002, F003, D007) - noted as being open, without the ring lock secured.

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Page Four - RCRA Inspection Report

Facility Name: <u>US AIRWAYS</u>

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.

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Page Five - RCRA Inspection Report

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?	Ves

< 55 Gallons? <u>Due to safety concerns</u>, 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? <u>yes</u> Aisle Space? <u>yes</u> Labeled? <u>yes</u>

Dated? <u>yes</u> Evidence of Release? <u>none observed</u>

< 90 Days? <u>yes</u> Good Condition? <u>yes</u>

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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.

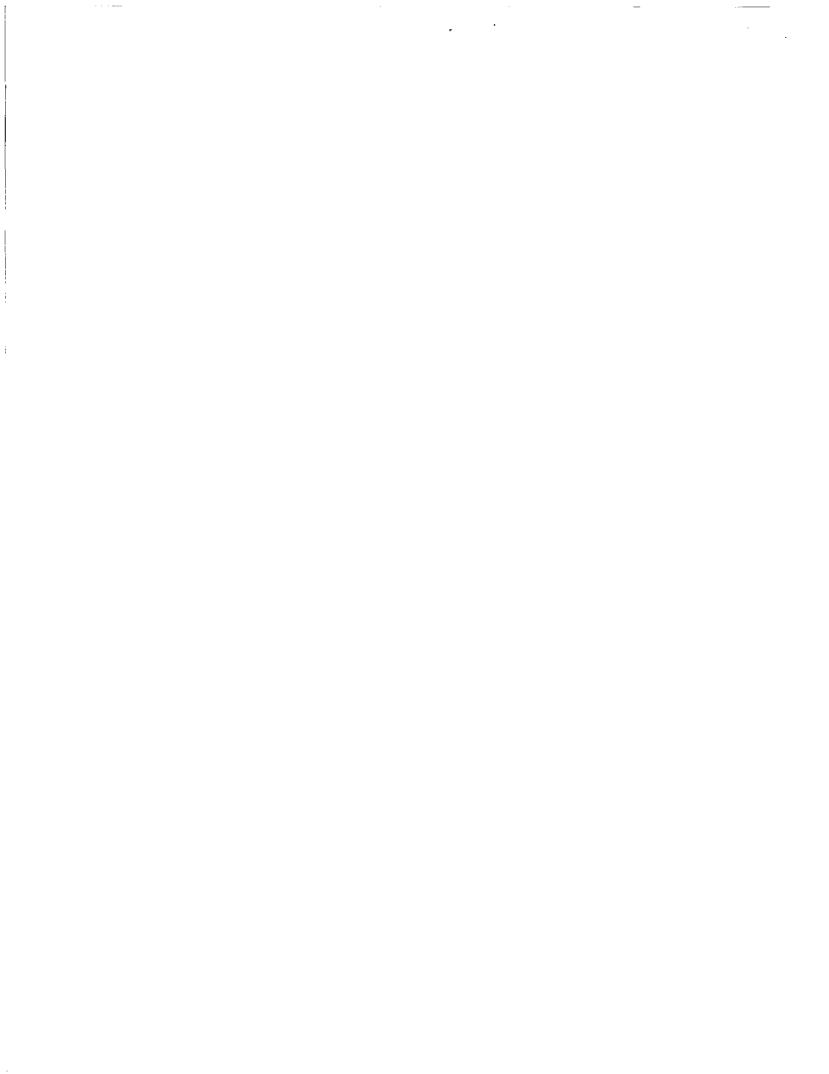
During the inspection, it was noted that the facility was not performing these inspections on a weekly basis. US AIRWAYS personnel failed to perform these required inspections between September 1, 1999 and September 14, 1999, and between October 18, 1999 and November 8, 1999. The facility must perform 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.

- 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 repacked 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.

And Mar Sp. 12-6-99	CENTIFIED MAIL) Facility Contact	
Inspector (Date)	Facility Contact	(Date)
Follow Up Inspection:		
Comments:		
Inspector (Date)	Facility Contact	(Date)

