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NORTHROP CORPORATION
ANAHEIM, CALIFORNIA

RCRA COMPLIANCE EVALUATION INSPECTION

REPORT

Prepared For

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	:	R09020
EPA Region	:	9
Site No.	:	CAD008289431
Date Prepared	:	September 7, 1990
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PRC No.	:	012-R09020
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NGSC-OCHA013556

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103

WARNING LETTER

Mr. Matthew Barenfeld
Northrop Corporation
500 East Orangethorpe Avenue
Anaheim, CA 92801

CERTIFIED MAIL NO. 595083
RETURN RECEIPT REQUESTED

Dear Mr. Barenfeld:

On July 11, 1990, a hazardous waste investigation was conducted by representatives of the Environmental Protection Agency (EPA) at Northrop Corporation in Anaheim, California, EPA Identification Number CAD008289431. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of Subtitle C of RCRA. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to correct the identified areas of noncompliance and to submit documentation of their correction to EPA within 30 calendar days of your receipt of this letter. Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests, and revised records. Where compliance cannot be achieved within 30 days, you must provide the reasons for the delay, a description of each corrective action planned, and a schedule on which each corrective action will be taken.

By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. EPA is also providing the State with notice that it intends to take appropriate enforcement action if the facility does not resolve the violations within the time specified above and the State does not take appropriate enforcement action. The State of California may notify EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may be punishable by civil and criminal actions, including penalties of up to $25,000 per day for each violation as provided by Section 3008 of RCRA.

EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentially claim.

Your response to this Warning Letter, due within 30 days of your receipt of this letter, shall be mailed to:

Ms. Jean Daniel
U.S. Environmental Protection Agency
1235 Mission Street
San Francisco, CA 94103

If you have questions related to technical aspects of the investigation report or this letter, please contact Jean Daniel at 415/744-1478.

Sincerely,

Karen Schwinn

Karen Schwinn
Chief
Waste Compliance Branch

Enclosure

cc: Bill Diekman, Orange County (w/ encl.)
Paula Rasmussen, DHS/TSCP, Region 4 (w/ encl.)
Don Johnson, DHS/TSCP, HQ (without encl.)

RCRA INSPECTION REPORT

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9

TOXICS AND WASTE MANAGEMENT DIVISION

WASTE COMPLIANCE BRANCH

Purpose :	RCRA Compliance Evaluation Inspection
Facility :	Northrop Corporation Anaheim, California
Facility Mailing Address :	500 East Orangethorpe Avenue Anaheim, California 92801
Facility EPA ID Number :	CAD008289431
Date of Inspection :	July 11, 1990
EPA Representatives :	Scott Wald, Geologist PRC Environmental Management, Inc. 415/543-4880
	Richard Vernimen, Environmental Toxicologist PRC Environmental Management, Inc. 415/543-4880
Facility Representatives :	Matthew Barenfeld Environmental Associate
Report Prepared By :	Richard Vernimen
Report Date :	September 7, 1990

Barbara Sootkoos
Work Assignment Manager

9-7-90
Date Approved

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1.0 INTRODUCTION

PRC Environmental Management, Inc., (PRC) received Work Assignment No. R09020 from the U.S. Environmental Protection Agency Region 9 (EPA) under Contract No. 68-W9-009 (TES 12). This work assignment calls for PRC to support EPA's enforcement of the Resource Conservation and Recovery Act (RCRA) by conducting compliance evaluation inspections (CEI) at 30 hazardous waste generator facilities in Southern California. Each CEI involves reviewing relevant facility information, conducting a site inspection, preparing an inspection report, and conducting informal enforcement.

On July 11, 1990, PRC conducted a CEI at Northrop Corporation's Electro-Mechanical Division (Northrop), located in Anaheim, California. The CEI evaluated the facility's compliance with applicable Federal regulations specified in 40 CFR Parts 260 through 270, that regulate generators of hazardous waste. The evaluation included completing a checklist developed by EPA specifically for hazardous waste generator CEIs (Appendix A).

This report summarizes the results of the inspection. Supporting documentation is provided in the appendices listed below:

Appendix A: RCRA CEI Checklist
Appendix B: Notification of Hazardous Waste Activity Form
Appendix C: Inspection Photographs

2.0 FACILITY BACKGROUND

The following sections describe the facility, its hazardous waste activities, and its regulatory status.

2.1 FACILITY DESCRIPTION

The Northrop main facility is located at 500 East Orangethorpe Avenue in a commercial and industrial area of Anaheim, California. Northrop formerly manufactured a variety of aerospace components for civilian and military customers. All manufacturing operations at Northrop have ceased and the facility is presently conducting closure activities, including removal of machine shop equipment and disposal of all hazardous wastes.

Northrop also operates a satellite facility (designated Building Y-19) at 1401 East Orangethorpe Avenue, which is located approximately three-quarters of a mile west (along East

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Orangethorpe Avenue) of the main facility. This facility is located in Fullerton, California, immediately north of the Anaheim city limit. The facility was formerly used for assembling electronic components. Like the main facility, this satellite facility has also ceased operations and is presently conducting closure activities.

The main facility consists of two primary buildings designated Y-1 and Y-2. Building Y-1 is an approximately 30,000 square foot building that formerly housed several operations including: (1) production machine shops; (2) metal plating shops; (3) painting shops; (4) quality assurance testing areas; and (5) tool manufacturing areas. Building Y-1 is vacant of all machinery and equipment, with the exception of the plating shop where several steel plating solution vats are still in place. Building Y-2 occupies approximately 20,000 square feet and formerly housed military aerospace research, development, and testing laboratories. A few of these labs are presently being used for aerospace electrical component testing.

Building Y-19 (the satellite facility) occupies approximately 20,000 square feet and primarily housed facilities for assembling printed circuit boards and other electronic components. Only one assembly station was being used during the inspection.

The facilities employed a total of approximately 2250 people in November of 1989. Currently the facilities have approximately 150 employees. The reduction in the work force is due to Northrop's impending closure of the facilities and the transfer of some of the Anaheim/Fullerton operations to Northrop's Hawthorne, California facility.

When conducting hazardous waste management activities, Northrop considers the main facility and Building Y-19 to be one single facility since they have only obtained an EPA ID number for the 500 East Orangethorpe (main) facility (EPA ID No. CAD008289431).

Northrop formerly operated a third separate facility located at 1541 Page Court in Anaheim (EPA ID No. CAD052837531). This facility manufactured artillery ammunition and was closed in April 1989.

2.2 REGULATORY STATUS

Northrop submitted their first of two Notifications of Hazardous Waste Activity forms (Notification) as a hazardous waste generator on August 14, 1980. The initial Notification indicated that Northrop generated hazardous waste from nonspecific sources only (F001, F005, F007, F017). A subsequent Notification, submitted June 22, 1981, expanded Northrop's listing of hazardous waste generated to include commercial chemical product hazardous wastes (P016, P041,

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P098, U032, U080, U103, U134) and non-listed (characteristic) hazardous wastes (D000, D001, D002). Both of these Notifications listed 500 East Orangethorpe Avenue, in Anaheim, as the facilities' address. A separate Notification was not submitted for the nearby satellite facility (Building Y-19) in Fullerton.

2.3 HAZARDOUS WASTE ACTIVITY

Northrop's most recent Notification (June 22, 1981) listed the facility as a generator of the following hazardous wastes:

Hazardous Waste	Hazardous Waste No.
Spent halogenated solvents	F001
Spent non-halogenated solvents	F005
Spent cyanide plating bath solutions from electroplating solutions	F007
Paint Wastes	F017
Dichloromethyl ether	P016
Diethyl-p-nitrophenyl phosphate	P041
Potassium cyanide	P098
Chromic acid H_2CrO_4, calcium salt	U032
Dichloromethane	U080
Dimethyl sulfate	U103
Hydrofluoric acid	U134
Characteristic wastes	
· ignitable	D001
· corrosive	D002
· EP toxic	D000

Currently, due to the termination of Northrop's manufacturing activities and the planned closure of the facility, hazardous waste generation activities consist of accumulating all hazardous wastes remaining on-site and preparing them for off-site disposal.

Hazardous waste is primarily being generated from closure activities at the main facility's plating shop. These closure activities include transferring spent plating solutions and sludges from the plating vats into 55-gallon drums for off-site disposal. The following plating wastes are being generated:

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Hazardous Waste Name	Hazardous Waste No.
Spent cyanide plating bath solutions	F007
Filter cake w/ heavy metals	TCLP metals
Waste acid solutions	D002
Waste alkaline solutions	D002

Other hazardous wastes being accumulated at the main facility include 1,1,1-trichloroethane (1,1,1-TCA, F002), paint filters (TCLP metals, D001), and crushed 55-gallon drums that previously contained acids (D002). Also, the facility is lab packing a variety of laboratory chemicals for off-site disposal.

The satellite facility is generating small amounts (less than 1 gallon per day) of 1,1,1-TCA from a small (one person) printed circuit board project. Two 55-gallon drums of waste 1,1,1-TCA have been accumulated at the satellite facility's hazardous waste accumulation area. According to Northrop's facility representative, Matthew Barenfeld, these drums will be transported to the main facility's accumulation area prior to their disposal off-site.

3.0 INSPECTION OBSERVATIONS

Observations made during the walk-through inspections of the satellite and main facilities are described below in Section 3.1. PRC's attempts to obtain applicable hazardous waste management documents from Northrop are described in Section 3.2.

3.1 FACILITY INSPECTION

The following areas at the Northrop facilities were inspected: (1) satellite facility work station; (2) satellite facility hazardous waste accumulation area; (3) main facility plating shop; and (4) main facility hazardous waste accumulation area. In addition, vacant work areas of both facilities were inspected. These areas include former work stations where hazardous wastes were previously generated.

3.1.1 Satellite Facility Work Station

Hazardous waste generation at the satellite facility was limited to one work station in Building Y-19. A single employee at this work station is working with printed circuit boards. Small quantities (less than 1 gallon per day) of 1,1,1-TCA are generated at the work station. Used solvent is accumulated in a small container that is emptied into a 55-gallon waste 1,1,1-TCA accumulation drum located in the satellite facility's hazardous waste accumulation area.

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3.1.2 Satellite Facility Hazardous Waste Accumulation Area

The hazardous waste accumulation area at the satellite facility is located immediately in back of Building Y-19. The area consists of a concrete pad measuring approximately 25 by 30 feet, and is subdivided into seven separate areas by 6-inch high concrete berms. Three of these bermed area are designated for hazardous waste storage, three are used for chemical product storage, and the remaining area is occupied by a raised sump. This accumulation area is surrounded by a chain-link fence, and is cover by a metal canopy. All appropriate warning signs and safety equipment are present.

The hazardous waste accumulation area contained two 55-gallon drums of waste 1,1,1-TCA, and several chemical product drums. All drums were in good condition. One of the 55-gallon drums of waste 1,1,1-TCA was marked with an accumulation date of July 5, 1989 (371 days on-site). The second drum's accumulation date was marked June 27, 1990 (15 days on-site). A photograph taken of the drum's hazardous waste label did not show the accumulation date clearly. According to Mr. Barenfeld, these drums of waste 1,1,1-TCA are transported to the main facility's hazardous waste accumulation area before being manifested off-site.

3.1.3 Main Facility Plating Shop

The plating shop in the main facility's Building Y-1 contains approximately thirty 200-gallon steel vats that formerly comprised the plating line. According to Mr. Barenfeld, plating solutions from most of these vats were transferred to 55-gallon drums which are collected in the hazardous waste storage area prior to shipment off-site. Approximately six of the vats still contained plating solutions at the time of the inspection. The majority of these plating wastes are waste acid and alkaline solutions (D002).

3.1.4 Main Facility Hazardous Waste Accumulation Area

The main facility's hazardous waste accumulation area is located in the south central region of the facility and is designated structure Y-11. The structure consists of an approximately 1500-square foot concrete pad that is surrounded by approximately 12-feet high walls constructed of plywood and aluminum. A steel and aluminum canopy is constructed over the concrete pad and its surrounding walls. The north side of the accumulation area is designated for accumulation of corrosive wastes. Fifty-five gallon drums of solvents and lab packs are accumulated in their respective bermed sections on the south side of the accumulation area.

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Approximately 39, 55-gallon steel drums containing waste acid solutions was present in the north side of the accumulation area. These drums were labeled appropriately and appeared to be in good shape. However, these drums were not arranged to maintain adequate aisle space for unobstructed movement of fire, spill control, and decontamination equipment in an emergency (Appendix C, Photograph No.1).

Approximately 14, 55-gallon drums containing waste 1,1,1-TCA were present in a bermed section of the southeast corner of the accumulation area. Three lab-pack drums were placed in a bermed section of the southwest corner of the accumulation area. The drums were properly labeled and appeared to be in good shape.

Two steel roll-off bins (approximately 500-cubic feet capacity each) were located just outside the hazardous waste accumulation area structure (Appendix C, Photograph No. 2). One contained crushed acid waste drums (unrinsed). The second bin contained heavy metal laden filter cake. Both bins were properly marked and placarded.

According to Mr. Barenfeld, alkaline wastes are disposed of in a Class I landfill outside of California. Acid wastes and 1,1,1-TCA are recycled off-site. Heavy metal laden filter cake is landfilled at the Chemical Waste Management, Inc. Class I landfill in Kettleman Hills, California. The crushed acid waste drums are also taken to the Kettleman Hills facility.

3.2 DOCUMENT REVIEW

The inspection team requested the following documents for review:

1) Hazardous Waste Worker Training Plan
2) Hazardous Waste Worker Training Record
3) Hazardous Waste Area Inspection Log
4) Results of Waste Analyses
5) Contingency Plan
6) Biennial Reports
7) RCRA Hazardous Waste Manifests
8) Land Disposal Restrictions Notifications and Certifications
9) Facility Closure Plan

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Mr. Barenfeld explained that since the Anaheim facility is closing, all hazardous waste management records are stored at Northrop's Hawthorne, California facility. The inspectors made arrangements with Mr. Barenfeld to have these documents sent to them as soon as possible.

When the documents were not received after 30 days, PRC contacted Kalim Butt, Mr. Barenfeld's supervisor, and Northrop's Environmental Control Manager. PRC inquired why the documents were not sent, and informed Mr. Butt that failure to provide the documents would be a violation of RCRA regulations. Mr. Butt claimed that Northrop's legal department required him to receive a written request for the documents from PRC. PRC explained that a written request was not required, since their RCRA inspection authority permits inspectors to obtain and review hazardous waste management documents as part of the RCRA CEI. In addition, the documents should have been available on-site for the inspectors to review. Mr. Butt stated that he understood and would have the documents delivered promptly. However, the documents were not delivered as of September 6, 1990.

3.3 STATUS OF PREVIOUS VIOLATIONS

No outstanding violations or orders against the facility were identified from review of EPA and Orange county files.

3.4 DISCUSSION WITH FACILITY MANAGEMENT

Following the walk-through inspection, the inspection team held a brief meeting with Mr. Barenfeld to discuss their observations. The inspectors brought the following observations to Mr Barenfeld's attention:

- One 55-gallon drum of waste 1,1,1-TCA at the satellite facility had been on-site for 371 days, according to the drum's accumulation date
- 55-gallon drums of corrosive wastes at the main facility's hazardous waste accumulation area were not arranged to provide proper aisle spacing
- Hazardous waste management documents were not on-site and available for inspection

4.0 POTENTIAL VIOLATIONS

Potential violations of RCRA regulations are listed below. Each potential violation includes (1) reference to the specific paragraph and subparagraph of the RCRA regulations

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violated; (2) reference to the hazardous waste management unit and/or location of the potential violation; (3) description of how the regulatory performance standard was not met; (4) reference to photographs and/or other documents as appropriate to ensure that all potential violations cited are substantiated.

- Northrop failed to comply with the request made by duly authorized EPA representatives to supply copies of documents not available for review during the RCRA inspection. [Section 3007(a) of RCRA (42 U.S.C. 6927)]

- Northrop has not submitted a separate Notification of Hazardous Waste Activity for their satellite facility located at 1401 East Orangethorpe Avenue in Fullerton, California. [40 CFR Part 262.12(a)]

- The facility does not keep hazardous waste manifests on-site. [40 CFR Part 262 Subpart B]

- The facility does not keep copies of their biennial reports on-site. [40 CFR Part 262 Subpart D]

- The facility does not keep copies of their hazardous waste personnel training program on-site. [40 CFR Part 265 Subpart B]

- There was inadequate aisle space in the corrosives section of the main facility's hazardous waste storage area for unobstructed movement of fire, spill control, and decontamination equipment in an emergency (Appendix C, Photograph No. 1). [40 CFR Part 265.45]

- The facility does not keep copies of their Contingency Plan on-site [40 CFR Part 265 Subpart D]

- According to its accumulation date, one 55-gallon drum of waste 1,1,1-TCA in the satellite facility's hazardous waste accumulation area was on-site for 371 days (Accumulation date could not be read from the photograph taken of the drum label). [40 CFR Part 262.34(a)]

- The facility has not kept copies of appropriate land disposal restriction supporting data, including notices, certifications, and waste analyses [40 CFR Part 268.76(a)(3-6)]

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APPENDIX A
RCRA CEI CHECKLIST