



RCRA Compliance Inspection Report

AkzoNobel Coatings

Salem, Oregon

ORD009412602

July 18, 2023 – July 19, 2023

X Justin Young
Justin Young (Dec 21, 2023 07:30 EST)

Justin Young
EPA RCRA Inspector

X George Wieber
George Wieber (Dec 20, 2023 15:33 EST)

George Wieber
RCRA Inspector/Contractor

X Cameron Tanaka

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Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Section A: Basic Facility and Inspection Information

Facility Information

Handler Name: AkzoNobel Coatings

Handler ID Number: ORD009412602

Facility Contact(s)/Title: Rodney Smith/Health Safety Environmental and Security Manager
Ryan Oates/Site Manager

Facility Location Address: 1660 Cross St SE Salem, OR 97302

Facility Mailing Address: 1660 Cross St SE Salem, OR 97302

Contact Phone Numbers: 503-586-1170
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Contact Email Addresses: rodney.smith@akzonobel.com
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GPS Coordinates of Site: Latitude: 44.92495
Longitude: -123.02298

Inspection Information

Inspection Type: RCRA Focused Compliance Inspection (FCI)

Inspection Dates: July 18, 2023, to July 19, 2023

Arrival Time: 08:30 on July 18, 2023

Departure Time: 15:00 on July 19, 2023

Inspection Team: Justin Young (EPA HQ); George Wieber, Cameron Tanaka (Eastern Research Group, Inc. [contractors])

Section B: General Facility Information

Owner/Operator Information

The AkzoNobel Coatings (ANC) facility located in Salem, Oregon consists of one main production building, an administration building, a hazardous waste storage shed, a nitrocellulose shed, an outdoor storage area, a solvent tank farm, a pigment building, a tank washing building, a containment building, an R & D wood shop, and two product development labs. This description is based on their site diagram included in the facility's Contingency Plan, or Attachment 01. ANC owns and operates the facility, and the company also operates production facilities globally. ANC has its United States headquarters in Nashville, TN.

Site Location

The facility is in Salem, Oregon. A facility site diagram is included in the facility's Contingency Plan is included as Attachment 01.

Background and Activities

The facility is a large manufacturing facility that produces industrial/professional water-based and solvent-based wood coatings, including ultraviolet (UV) cured products. They specialize in low-VOC solvent-based coatings, such as acetone. ANC wood coating products are produced for industrial and professional use rather than consumer use. The facility's operations consist of making various batches of their wood coating products, repurposing off-spec products, and adjusting and testing formulas in their labs. They produce about 22 batches per day (with each batch ranging from 5 gallons to 6000 gallons) and an estimated 9,000 gallons of product per day and 2 million gallons of product per year. In 2022, they used approximately 1,000 formulas for their coatings. Their products are made to order, so they do not consistently keep stock or inventory. They use solvent for washing tanks and equipment and uses a solvent recirculation system. ANC uses acetone predominantly for washing vessels processing low-VOC coatings and they may use butyl acetate. Their labs produce small batches of coatings for testing and focus on solutions by adjusting formulas rather than inventing new ones. ANC purchased the 10-acre facility and began operations in 1965. ANC operates from 5 AM to 5 PM in one staggered shift from Monday to Friday. There are approximately 52 employees employed at the facility at the time of the inspection. More information from ANC on their background and activities is included as Attachment 02. Their industrial profile is included as Attachment 03.

Section C: Regulatory Information

Compliance History

The Oregon Department of Environmental Quality (DEQ) inspected the facility on March 14, 2022, and conducted an unannounced hazardous waste compliance evaluation inspection. The inspection identified a violation for failing to comply with 40 Code of Federal Regulations (CFR) 262.17(A)(5)(i)(C) by failing to mark an accumulation start date on a hazardous waste container. The inspection also identified a violation for failing to comply with 40 CFR 262.17(A)(5)(i)(B) by failing to indicate the hazards of the contents in a hazardous waste container. A notice of noncompliance was issued to ANC on March 27, 2022, and no formal enforcement action was taken. According to the Enforcement and Compliance History Online (ECHO) record for ANC, no formal enforcement actions have been taken in the past 10 years. In October 2020, they received a Base Program – Letter of Violation/Warning Letter for their Industrial Stormwater NPDES program. Inspections from 2014 until 2022 identified no violation of hazardous waste requirements.

Regulatory Status

ANC is classified as a large quantity generator (LQG) of hazardous waste. Additionally, ANC operates with a Stormwater NPDES 1200-Z general permit (ORR231057). ANC also has a minor Clean Air Act permit that expires on June 1, 2027 (24-9205-ST-01). They are not subject to 40 CFR Part 265 Subpart BB and therefore do not have an LDAR program.

In 2021, the facility reported generating 97.1 tons of hazardous waste on its Biennial Report.

Site Hazardous Waste Information

ANC operates one main manufacturing and warehouse building where large-scale manufacturing operations take place. This building has 4 sections, referred to as areas A, B, C, and D. Area A is the facility's tinting area, area B is for most of the facility's UV products, area C is where most water-based products are manufactured and includes some floor mixers, and solvent-based, water-based, and some UV products are manufactured in area D. They have a small QC lab in area B and a solutions lab in area A. They also have a fifth area (area E) in the main building that includes solvent lacquer tanks or conversion varnish from area A.

ANC's manufacturing operations produce hazardous waste including solvents, resins, and additives, such as silicon. They also manage p-toluene sulfonic acid (PTSA) waste, which they use as a catalyst, as D002 waste. It is disposed as a commercial chemical product (CCP) that is expired/unused. ANC manages the hazardous waste in approximately 17 satellite accumulation areas (SAAs), and one central accumulation area (CAA) for containerized hazardous waste. 55-gallon drums are the only type of hazardous waste containers used on site. Totes are generally only used for aqueous material. The facility collects their hazardous waste by recirculating their process lines for homogenization, filling lines to product containers, and adding 10-15 gallons of solvent to flush tanks, pumps, housings, and fill heads. ANC collects the solvent in a pail. The pail is then dumped into 55-gallon drums in SAAs. Their procedures for management and handling of wash solvent and hazardous waste generated by solvent parts washing is included as Attachment 04.

There is one CAA for containers managed on site. Most of the facility's hazardous waste comes from rinsing solvent-based tanks which is disposed of in 55-gallon drums in SAAs. The drums from SAAs are then brought to the hazardous waste shed, the CAA. ANC conducts weekly inspections of their CAA. Their weekly inspection log includes the following hazardous waste streams: dirty wash solvent, solid waste-dirty clean out/lab solvent sludge, off spec/obsolete/waste UV, solid waste-paint filters/miscellaneous, off spec/obsolete/waste paint catalysts, obsolete raw material/paint/stains/lacquers, and solvent rags. ANC generally ships about 70 55-gallon drums off site every 90 days. Their last shipment off site as of the inspection was on July 14, 2023. They also manage wipes and solvent rags as hazardous waste, and generally use wipes more than solvent rags. There are several parts washers throughout their production areas.

ANC also manages universal wastes. For their lamps, they are involved in an exchange program with a company that manages replacement lamps. Their batteries are collected in a drum near their hazardous waste shed. They also will periodically dispose of mercury containing equipment.

ANC utilizes Emerald Services Inc. (under ownership by Clean Harbors) as the hazardous waste transporter to take wastes off site. This was confirmed reviewing 2021 hazardous waste manifests. Clean Harbors picks up containerized wastes as needed. Operators are responsible for labeling and dating SAA drums that are transferred to the CAA. Mr. Smith helps make waste determinations for lab or off-specification materials as necessary. Mr. Smith typically uses SDS sheets to make these determinations.

Section D: Description of Inspection

Purpose of Inspection

EPA Region 10 identified ANC for a RCRA NCI inspection using the neutral scheme targeting list for the Hazardous Waste Air Emissions National Compliance Initiative developed by EPA's Waste and Chemical Enforcement Division (WCED). The purpose of the inspection was to determine the facility's compliance with RCRA, with a special focus on the applicability/requirements of Subparts AA, BB, and CC of 40 CFR Part 265.

Site Access

The inspection team met in the administration building parking lot and entered the building at 08:30 on Tuesday, July 18, 2023. EPA had contacted ANC to announce the inspection in advance. The inspection team checked in with Rodney Smith, Health Safety Environmental and Security Manager at ANC, in the lobby upon arrival. Shortly after the inspection team checked in, the inspection team received visitor badges and Mr. Smith accompanied the team to a conference room on site.

Inspection Entry and Opening Conference

In the conference room, we were joined by Ryan Oates (Site Manager). Justin Young from EPA and George Wieber from ERG presented their inspector credentials to ANC personnel and informed them that this was a routine EPA RCRA NCI inspection that would not cover all RCRA regulations but instead focus on RCRA air emission regulations. Cameron Tanaka also joined the inspection team as a supporting engineer from ERG. Mr. Young stated that ERG was supporting the inspection by collecting data relevant to RCRA air emissions regulations and core RCRA regulations. The objective of the data collection was to evaluate compliance with RCRA LQG and Subparts AA, BB, and CC requirements.

Mr. Young stated that data collection activities would include EPA Method 21 comparative monitoring of equipment potentially applicable to Leak Detection and Repair (LDAR) program requirements and hazardous waste containers, as well as emission screening using a Forward Looking Infrared (FLIR) camera. Mr. Young inquired about any safety requirements for the use of equipment that is not intrinsically safe in the process area. Mr. Smith stated that they have an intrinsically safe tablet that they will take photos with. Mr. Young explained ANC's right to claim confidential business information (CBI). ANC did not provide anything during or after the inspection that was claimed to be CBI. Any information claimed as potential CBI in documents provided to the inspection team was redacted to remove potential CBI information. Participants in the inspection for each day were recorded on attendance logs. This inspection report and its attachments represent the inspection team's observations/findings.

All photographs taken during the walkthrough and inspection are provided in Attachment 05. The photograph numbers in this report correspond to the number inside of Attachment 05.

Inspection Summary

July 18, 2023

Following the opening conference, Mr. Smith, with help from Mr. Oates, provided an overview of the facility's history, operations, safety culture, and hazardous waste management program. They gave the inspection team a safety orientation. The inspection team focused on hazardous wastes and equipment subject to RCRA Air regulations. Mr. Smith provided a detailed explanation of the way they use solvents at the facility and where their waste is stored. ANC provided piping and instrumentation diagrams (P&IDs), and facility layout diagrams for

equipment contacting hazardous waste solvents, which the inspection team reviewed. Mr. Smith, with help from Mr. Oates, provided a detailed description of each area and the types of products made in each area. In the afternoon (at approximately 14:30) inspectors conducted further process and records reviews, including reviews of ANC's contingency plan, manifests, inspection logs, waste profiles, pond drawings and trench system, pot wash drawing, and SPCC. ANC's SPCC/Spill Diagram is included as Attachment 06. The findings from the review of these records are described in detail in Section E.

After the review of these records, the inspection team departed the facility at approximately 15:10 on July 18, 2023.

July 19, 2023

On July 19, 2023, Mr. Wieber and Mr. Tanaka arrived at the facility at approximately 08:00 and calibrated the flame ionization detector on the Toxic Vapor Analyzer (TVA) 2020 for use in comparative LDAR monitoring. ERG calibrated the TVA 2020 using zero air and methane gas at 500 and 10,000 parts per million (ppm). The team conducted a bump test of the TVA 2020 after calibration to ensure the equipment was operating properly. All readings during the bump check were within 10 percent of the span gas concentrations. Mr. Wieber ensured that the FLIR camera was operating properly by observing visible fumes through the camera when a lighter was discharging butane under the camera. Mr. Wieber utilized the FLIR camera during the second day of the inspection. The inspection team conducted monitoring per EPA Method 21 at the facility with the TVA 2020. Mr. Wieber used the FLIR camera to scan for fugitive emissions from the facility's equipment throughout the inspection. Method 21 monitoring was primarily done by Mr. Tanaka with Mr. Wieber taking notes. Hazardous waste lines and other various pieces of equipment were monitored where accessible. At 08:45, the inspection team, along with Mr. Smith, Mr. Oates, and Bradd Brunkal, ANC's production manager, entered the facility and began their walkthrough of the process in Area A.

In Area A, the inspection team first viewed a 55-gallon drum of wash solvent that was about 2/3 full (see Photo 1 in Attachment 05). The drum was in good condition, closed, and it included hazardous waste labels identifying the hazards. Mr. Brunkal said that this wash solvent drum can last 4-5 months before needing to be disposed of. ANC indicated that there are 3 or 4 wash solvent drums in area A. The inspection team viewed a parts washer with solvent and two unlabeled and open buckets underneath it. ANC personnel indicated that when the parts washer is dirty, they drain the material into buckets and transfer the buckets to a SAA drum in Area B. The parts washer was not actively draining or being used at the time of the inspection. Mr. Tanaka monitored these buckets with the TVA 2020 and found no detectable emissions (NDE) above background. There were two adjacent drums, one being for wash water and the other being for wash solvent. A photo of the parts washer was taken as shown in Photo 2 in Attachment 05.

Next in Area A, the inspection team observed buckets approximately 5-gallon in size containing residual liquid, dirty PPE, and rags. The buckets were open and on the floor near operators. These operators stated that these buckets were "transfer buckets" or transfer pails that will be disposed of in the general trash at the end of the week. The operators stated that these buckets are not managed as hazardous waste. Mr. Tanaka monitored the buckets and found NDE above background. One of the buckets was labelled as "M410-R-20-372 Red N/P Monocolor" and the others were unlabeled. ANC personnel indicated that they may reuse the buckets as transfer pails. The buckets were in good condition. A photo of these transfer pails was taken as shown in Photo 3 in Attachment 05.

The inspection team observed a 5-gallon bucket with an open lid that contained waste PPE, rags, and stir sticks. The bucket was in good condition and was not labeled with a hazardous waste label. The bucket was an empty raw material pail from the batch process. Mr. Tanaka observed a maximum concentration of 3,609 ppm from this bucket, while the background concentration was 12.5 ppm. A photo of this bucket was taken as shown in Photo 4 in Attachment 05.

1. A maximum concentration of 3,609 ppm was observed using the TVA 2020 coming from the 5-gallon bucket in the front of the bottom of the cart from the perspective of the photo below.



{Photograph 4, Attachment 05}

ANC personnel indicated that they use designated pumps for different products such as clear lacquer or pigmented lacquer. The inspection team next observed an automated fill station that ANC cleans by flushing acetone through it and collecting the rinse material in a pail. This material is then transferred to SAA drums. There were two 55-gallon SAA drums in Area A located next to the mezzanine. One of the drums was designated for solids and the other was designated for wash solvent. Both of the SAA drums were clearly identified as hazardous waste and flammable with labels. The drums were closed and in good condition. The SAA was labeled with a sign indicating that it was an SAA. A photo of the SAA drums was taken as shown in Photo 5 of Attachment 05.

Next to the fill station, the inspection team observed a wash solvent drum in Area A with a loose metal lid without drum locking rings. The drum was in good condition and clearly labeled with a hazardous waste and flammable label, identifying the hazards. Mr. Tanaka observed a maximum concentration of 9,770 ppm from this bucket, while the background concentration was 11.1 ppm. A photo of this wash solvent drum was taken as shown in Photo 6 in Attachment 05.

2. A maximum concentration of 9,770 ppm was observed with the TVA 2020 coming from the wash solvent drum in the foreground of the photo below.



{Photograph 6, Attachment 05}

The inspection team then moved to Area B at approximately 10:00. They viewed the facility's UV tank. A nearby SAA drum of UV solid wastes included a hazardous waste label and the hazard was identified as flammable. The drum was in good condition, and it was closed. The inspection team also observed wash solvent drums and a staging area for portable diaphragm pumps. ANC had a color-coding system for different product types for these pumps. The inspection team observed two fill off stations (for loading product containers) near Area B's letdown tanks with one being a manual gravity feed and the other being pumped. There was an SAA closer to the letdown tanks adjacent to a parts washer, which was used for waste solids. An unlabeled open bucket under the parts washer was about 1/4 full of liquid. The bucket was in good condition. The parts washer was not actively draining or being used at the time of the inspection. The parts washer was clearly labelled as hazardous and flammable. ANC personnel indicated that they dump the solvent from this bucket into a 55-gallon SAA when the parts washer is dirty. Mr. Tanaka observed a maximum concentration of 984 ppm from this bucket, while the background reading was 15 ppm. A photo of this bucket and the parts washer was taken as shown in Photo 7 in Attachment 05.

3. A maximum concentration of 984 ppm was observed with the TVA 2020 coming from the bucket in the foreground of the photo below.



{Photograph 7, Attachment 05}

Next, the inspection team viewed ANC's manual pot wash. This included a clean solvent tank and a dirty solvent tank. The dirty solvent tank is approximately 330 gallons. ANC indicated that they recirculate solvent from the dirty solvent tank for multiple washes. On the bottom of the dirty solvent tank, there was a hard pipe with two valves and a cap, which drains to a 55-gallon SAA drum. The upper valve of this piping system was open. Mr. Tanaka monitored this piping and found NDE above background. The inspection team observed two 55-gallon SAA drums under the tanks, one being for UV wash and the other being for wash solvent. The drums were in good condition, closed, and they included hazardous waste labels identifying the hazards. ANC personnel explained that for UV product washes, they drain directly to the UV SAA drum, not to the dirty solvent tank. Mr. Brunkal mentioned that the last material going through the pump is always clean solvent to the dirty solvent tank. The piping on the dirty solvent tank is shown in Photo 8 in Attachment 05 and the two SAA drums under the tanks are shown in Photo 9 in Attachment 05. Mr. Tanaka also monitored the pump connections for diaphragm pump of the manual pot wash and found NDE above background. ANC personnel explained that the manual pot wash is not used as much as they are transitioning to using the Renzmann pot wash.

The inspection team observed the Renzmann pot washer. The current Renzmann pot washer schematics are included as Attachment 07. The inspection team observed two SAA drums adjacent to the Renzmann washer, one being used for wash solvent and the other for UV wash. Both of these drums were in good condition, closed, and they included hazardous waste labels identifying the hazards. ANC personnel indicated that the wash solvent SAA drum adjacent to the Renzmann washer accepts parts washer solvent from throughout the facility as well as residual products. A photo of these SAA drums was taken as shown in Photo 10 in Attachment 05. Mr. Tanaka monitored an open bucket under the Renzmann parts washer that contained residual fluid and observed a concentration of 1683 ppm. The bucket was not labelled and was in good condition. The parts washer was not actively draining or being used at the time of the

inspection. The parts washer was clearly labelled as hazardous and flammable. A photo of this bucket and the Renzmann parts washer was taken as shown in Photo 11 in Attachment 05.

4. A maximum concentration of 1,683 ppm was observed with the TVA 2020 coming from the bucket in the foreground of the photo below.



{Photograph 11, Attachment 05}

At the Renzmann outlet and pot wash, the inspection team observed clean and dirty solvent tanks. ANC personnel indicated that they recirculate wash solvent through the dirty tank. The inspection team observed that the outlet to a 55-gallon SAA drum is a hard-piped line with a valve and cap. This SAA drum was labelled as hazardous waste and wash solvent. The drum was in good condition and closed. A photo of this drum and the outlet of the Renzmann dirty solvent tank was taken as shown in Photo 12 in Attachment 05.

The inspection team also observed an open pan with liquid in it next to the Renzmann equipment. The liquid in the pan appeared to be drained from the Renzmann dirty solvent tank. Mr. Tanaka monitored this drip pan and observed a concentration of 30,000 ppm (3.0%), with a background concentration of 28 ppm. Three photos of this drip pan for the Renzmann filter were taken as shown in Photos 13-15 in Attachment 05.

5. A maximum concentration of 30,000 ppm was observed with the TVA 2020 coming from the drip pan in the photos below. The photo on the left shows Mr. Tanaka taking the measurement with the TVA 2020 and the other two photos show the drip pan.



{Photographs 13-15, Attachment 05}

Mr. Young observed material dripping from the filter at the outlet of the Renzmann dirty solvent tank and asked the ANC personnel what the cause of the leak was. Mr. Brunkal said that there was a leaking part and he explained that he had ordered a replacement for this part.

The inspection team moved on to Area C of the ANC facility. They observed tanks for latex and a wash solvent drum under the latex tank platform. The drum was labelled as hazardous waste and flammable and in decent condition. The wash solvent drum had a loose lid and Mr. Tanaka observed a concentration of 16,000 ppm (1.6%) coming from this drum, with a background concentration under 50 ppm. This drum is shown in Photo 16 in Attachment 05.

6. A maximum concentration of 16,000 ppm was observed with the TVA 2020 coming from the drum in the photo below.



{Photograph 16, Attachment 05}

The inspection team observed another parts washer with an empty collection bucket under it and the facility's East 2000 Tank for water-based primer before moving on to Area D.

In Area D, the team inspected ANC's West 2000 Tank and their West 1000 Tank for solvent primer. Mr. Oates explained that Ryan Warnock (Team Lead) said that ANC had not been flushing or cleaning the tanks between batches. He indicated that if they were to flush the tanks, the flushed material would be emptied into pails or totes then recycled into the next batch. The inspection team observed a parts washer under the mezzanine in Area D with an unlabeled open bucket underneath it that was approximately 1/3 full. The bucket was in good condition. The parts washer was not actively draining or being used at the time of the inspection. The parts washer was clearly labelled as hazardous and flammable. Mr. Tanaka observed a concentration of 6,800 ppm from this bucket, with a background concentration of 40 ppm. This bucket is shown in Photo 17 in Attachment 05.

7. A maximum concentration of 6,800 ppm was observed with the TVA 2020 coming from the bucket in the photo below.



{Photograph 17, Attachment 05}

The inspection team also observed a half full 55-gallon SAA drum adjacent to this parts washer that holds hazardous waste solids. The drum was in good condition, closed, and included hazardous waste labels identifying the hazards.

The inspection team moved on to Area E of the ANC facility, the mezzanine. They observed a 55-gallon SAA drum for hazardous waste solids that was about 20 percent full. The drum was closed and in good condition. This SAA drum had a hazardous waste label and an indication of the hazards. This drum is shown in Photo 18 of Attachment 05.

The inspection team then walked through the facility's Quality Control Lab. They observed a parts washer with an empty bucket underneath it. Robert Mosher (the lab's quality manager) explained that the Quality Control Lab tests products for gloss, viscosity, color, and other similar quality indicators. He said that they have the following SAAs in the lab: a 1-gallon can for lab solvent sludge, a 2-gallon can for solvent rags, filters, and other debris, and a 5-gallon pail of wash solvent under a counter. The inspection team observed that each of these SAAs had a hazardous waste label identifying the hazards and that they were closed and in good condition. A photo of the 5-gallon pail is included as Photo 20 of Attachment 05 and a photo of the parts washer with two containers is included as Photo 21 of Attachment 05. Both containers under the parts washer were open and not clearly labelled. The containers were in good condition. The parts washer was not actively draining or being used at the time of the inspection. The parts washer was clearly labelled as hazardous. The inspection team also observed a wash solvent can that was in use and Mr. Tanaka observed a concentration of 18,600 ppm, with a background of 9 ppm. The inspection team observed that this wash solvent can had a hazardous waste label identifying the hazards and that it was closed and in good condition. This in-process wash solvent can is shown in Photo 19 of Attachment 05. After this reading was taken, ANC personnel moved a brush that was propping the can open. After moving the brush, Mr. Tanaka found NDE above background from this can.

8. A maximum concentration of 18,600 ppm was observed with the TVA 2020 coming from the can on top of the counter in the photo below.



{Photograph 19, Attachment 05}

The inspection team then took a break for lunch and returned to the facility at 12:30 and began a walkthrough of ANC's Solutions Lab. They observed a parts washer with a closed bucket underneath it. They also observed an approximately 25-gallon SAA container near the parts washer that ANC personnel indicated was a step can for hazardous waste solids, such as PPE and rags. This container had a clear hazardous waste label identifying the hazards, and it was closed and in good condition. The inspection team observed another parts washer with a closed bucket underneath it. ANC personnel explained that the Solutions Lab SAA has two 55-gallon drums, one for solids and one for liquids. The inspection team observed that the solids SAA drum was nearly full and the liquids SAA drum was about 1/3 full. These drums were closed, in good condition, and clearly labelled with a hazardous waste label identifying the hazards. The SAA drums in the Solutions Lab are pictured in Photo 22 of Attachment 05. Mr. Oates and Mr. Mosher explained that the waste solids in the approximately 25-gallon SAA step can are transferred to the 55-gallon drum in the Solutions Lab SAA when it is full. In total, the Solutions Lab had 3 parts washers. Each of these parts washers was not actively draining or being used at the time of the inspection. The parts washers were clearly labelled with a hazardous waste label identifying the hazards. ANC personnel explained that when the wash for these parts washers is dirty, they empty it into a bucket and transfer that bucket into a 55-gallon drum in the Solutions Lab SAA. ANC personnel indicated that they go through the Solutions Lab on a monthly basis to dispose of inventory, and that the inventory is disposed of in the Solution Lab SAA drums. A picture of a parts washer with a bucket underneath it is shown as Photo 23 of Attachment 05 and a picture of the solids step can is shown as Photo 24 in Attachment 05.

The inspection team moved on to the water-based pot wash area, which was a building outside of the rest of the facility. ANC personnel explained that pots are power washed in this area and that they drain the effluent through a grate to the POTW. Their POTW Permit Issuance Rational from 2015 is included as Attachment 08. A photo of the water-based pot wash shed is shown as Photo 25 in Attachment 05. A photo of the settling pit/sump outside of the shed is shown as

Photo 26 in Attachment 05. ANC also explained that River City Environmental, a contractor, pumps out sludge from the sump approximately every month and that the sludge is managed as non-hazardous waste. The indicated that a third party performs the analysis of this sludge.

Next, the inspection team observed ANC's hazardous waste storage shed, or the CAA. The team observed 18 drums that were all composed of wash solvent. The oldest start accumulation date of these drums was 06/23/2023. All the drums were labelled visibly as hazardous waste and flammable liquid, and there was adequate aisle space in the CAA. The drums were all in good condition and closed. A photo of these CAA drums is shown as Photo 27 in Attachment 05.

The inspection team then moved onto the facility's dust collector. Mr. Mosher explained that they have performed analytical tests on the dust before and that they manage it as non-hazardous waste. An analysis of the dust from the dust collector is included as Attachment 09.

After the dust collectors, the team walked through the off-spec/rework material area. The inspection team observed six IBC totes, eight pallets of 5-gallon pails, and 18 55-gallon drums. The containers were all clearly labelled, in good condition, and closed. The team observed that some of the material was manufactured in 2022 and noticed an expiration date of 04/18/2023 for a water-based product. An overview picture of the pails is shown as Photo 28 in Attachment 05, and a closeup picture of the pails is shown as Photo 29 in Attachment 05. The inspection team then observed a larger set of containers accumulated for rework. The observed containers were all clearly labelled, in good condition, and closed. One of these containers, with a manufacture date of 11/13/2020, is shown as Photo 30 in Attachment 05. An overview of this larger set of rework containers is shown in Photo 31 and Photo 32 in Attachment 05. Mr. Young asked ANC personnel if they could provide an inventory of their rework containers. After the inspection, ANC provided a rework physical inventory and a rework inventory summary, which are included as Attachments 10 and 11, respectively. The rework physical inventory is the last physical count of the rework area and the inventory summary shows the total rework inventory and total scrapped containers each year since 2020. The inspection team also observed ANC's 40,000-gallon containment sump, which was empty. A picture of this sump is included as Photo 33 in Attachment 05.

The inspection team then returned to the conference room at approximately 14:15. The closing conference was then conducted at approximately 14:25 before the inspection team departed the facility at approximately 15:00.

Section E: Records Review

The inspection team reviewed ANC's records including their Contingency Plan, manifests, inspection logs, waste profiles, pond drawings and trench system, and pot wash drawing.

Contingency Plan

ANC maintains a RCRA Contingency Plan that includes facility background information, contingency plan requirements, emergency response actions and procedures, emergency responder arrangements, emergency coordinators, emergency response coordinators, emergency equipment, an evacuation plan, and a facility diagram. The inspection team noticed that they did not include a quick reference guide in their Contingency Plan.

ANC's Contingency Plan is included in Attachment 01.

Manifests

The inspection team reviewed the facility's manifests and ensured that they had maintained them for at least three years. Mr. Young reviewed their manifests from 2023 and half of 2022 while Mr. Tanaka reviewed their manifests from the other half of 2022 and 2021. Their manifests indicated that Clean Harbors manages their wastes and according to their 2021 manifests, Emerald Services Inc., under ownership by Clean Harbors, is the designated receiving facility. When necessary, Mr. Smith explained that he helps to make determination for laboratory or off spec materials. In these cases, the laboratory or quality personnel notify him of the requirement for him to make a determination, and he generally uses SDSs to make the determination. Mr. Smith also indicated that operators are responsible for labeling and dating SAA drums that are transferred to the CAA. The inspection team noted that one manifest from 2021 (manifest 017837899FLE) was outstanding with no TSDF signature.

Inspection Logs

ANC maintains weekly waste inspection forms used to record observations at the container CAAs and the SAA containers. Checklist items include checks that the correct containers are in good condition, that the area is clean and clear, that lids are closed tightly, that accumulation start dates are on the labels, that the labels are present and visible, that there is adequate aisle space, that there is a working fire extinguisher in the area. The number of drums of each type of hazardous waste stream is filled out along with the earliest accumulation start date of a drum with that type of stream.

An example of the weekly waste inspection log is included in Attachment 12. This example log is from 12/10/2021 and shows that the earliest accumulation start date for the obsolete raw material/paint/stains/lacquers waste stream was over 90 days before inspection, on 08/13/2023.

Training

The inspection team questioned ANC personnel about their RCRA training. Mr. Smith and Simone Busby receive 3rd party training from Environmental Resource Center, while other hazardous waste handlers receive training in-house. All their employees receive internal RCRA training annually. ANC keeps an excel sheet for tracking all their employees' training which the inspection team observed. No issues with this excel sheet were noted.

Areas of Concern

The presentation of areas of concern does not constitute a formal compliance determination or violation.

1. As mentioned in the Solutions Lab section of the inspection summary, they are transferring waste material from one SAA to another SAA in the Solutions Lab. Mr. Oates and Mr. Mosher explained that waste solids in their approximately 25-gallon SAA step can are transferred to a 55-gallon drum in the Solutions Lab SAA when it is full.

2. As mentioned in the off spec/rework material area section of the inspection summary, ANC has accumulated a significant amount of off-spec/rework material containers. This could be speculative accumulation as evidenced by the fact that some of the containers were expired and some were manufactured as early as 2020.
3. Under multiple parts washers throughout the facility, there were open buckets holding hazardous waste that resulted in high concentrations measured by the TVA 2020. These are described in more detail in the inspection summary, and an example is shown below.

A maximum concentration of 6,800 ppm was observed with the TVA 2020 coming from the bucket in the photo below.



{Photograph 17, Attachment 05}

4. ANC disposed of waste from certain parts washers into a SAA container not at or near the point-of-generation. As explained in the inspection summary, ANC personnel indicated that the wash solvent SAA drum adjacent to the Renzmann washer accepts parts washer solvent from throughout the facility as well as residual products.
5. As mentioned in the Contingency Plan section of Section E, ANC's Contingency Plan did not include a Quick Reference Guide, which is a potential area of concern if the Generator Improvements rule applies to ANC.
6. Their Renzmann and manual pot washer could potentially be subject to 40 CFR Part 265 Subpart BB. Specifically, there was a waste stream coming from their Renzmann pot washer that passed through a valve before being collected in a container.
7. Wash solvent drums that were in use had loose lids without drum locking rings and detectable emissions in several areas, such as in Area A below the mezzanine, as shown below. Other instances of this issue are described in more detail in the inspection summary.

A maximum concentration of 9,770 ppm was observed with the TVA 2020 coming from the wash solvent drum in the foreground of the photo below.



{Photograph 6, Attachment 05}

8. As mentioned in the inspection summary, the inspection team observed a leaking filter at the outlet of the Renzmann dirty solvent tank. Mr. Brunkal said that there was a leaking part and he explained that he had ordered a replacement for this part. The drip pan collecting the leaking material was monitored with the TVA 2020, a maximum concentration of 30,000 ppm was observed.
9. The inspection team observed detectable emissions on an open bucket of non-hazardous waste in Area A. The inspection team observed a 5-gallon bucket with an open lid that contained waste PPE, rags, and stir sticks. The bucket was an empty raw material pail from the batch process.

Aa maximum concentration of 3,609 ppm was observed using the TVA 2020 coming from the 5-gallon bucket in the front of the bottom of the cart from the perspective of the photo below.



{Photograph 4, Attachment 05}

10. As mentioned in Section E, one of the weekly inspection logs noted greater than 90 days of accumulation on a drum from 2021. This weekly inspection log is included as Attachment 12.
11. As mentioned in Section E, one of ANC's manifests from 2021 was outstanding and had no TSDf signature.
12. The inspection team observed approximately 5-gallon buckets containing residual liquid, dirty PPE, and rags. The buckets were open and on the floor near operators. These operators stated that these buckets were "transfer buckets" or transfer pails that will be disposed of in the general trash at the end of the week. The operators stated that these buckets are not managed as hazardous waste. The presence of residual material in these buckets could be a concern.

Closing Conference

The closing conference took place on July 19, 2023, at approximately 14:25. Attending from the facility were Mr. Smith, Mr. Oates, Mr. Mosher, Mr. Brunkal, Anthony Buller, Gunnar Power, and Simone Busby. Additionally, Anna Ros and Amy Harrison joined the meeting remotely.

Mr. Young, Mr. Wieber, and Mr. Tanaka were all present from the inspection team. A sign-in sheet for the closing conference is included as Attachment 13. The inspection team summarized the areas of concern identified during the inspection. Mr. Young explained the process moving forward and the timetable that the facility can expect for hearing back from the EPA and Region 10. In addition to the areas of concern, Mr. Young summarized additional documents that the inspection team would like to receive from ANC including the inspection photolog, the outstanding manifest, the inventory of rework material from the last few years. Mr. Young also requested a copy of the facility's production plan for the month of July, which is included as Attachment 14.

Mr. Young explained that the facility could respond to the areas of concern and notify EPA of actions to address issues identified. Mr. Young requested that responses be sent within two weeks following the inspection. Mr. Young identified himself as the primary point of contact for post-inspection responses, and Mr. Smith identified himself as the primary point of contact on ANC's end.

The inspection team concluded the inspection and left the facility on July 19, 2023.

Post-Inspection Facility Response

On July 28, 2023, Mr. Oates uploaded the requested information from the closing conference of the inspection to the File Transfer Protocol (FTP) site. The information has been incorporated into this report. In addition to providing the requested documentation, Mr. Oates also responded to several of the areas of concern discussed at the closing conference as outlined below.

For the area of concern regarding the transfer of waste material from one SAA to another SAA in the Solutions Lab (area of concern #1), a word document from Mr. Oates indicated that the small rag bin (the step can) has been removed. He explained that contaminated wipes go straight to the Solutions Lab's SAA drum for solids, and that the SAA locations map has been updated to account for this change. This explanation was uploaded in a Word document and is included as Attachment 15.

In response to the area of concern regarding the facility's parts washers having open buckets holding hazardous waste under them that resulted in high concentrations measured by the TVA 2020 (area of concern #3), the same word document addressing area of concern #1, included as Attachment 15, explained that since the inspection, their SOP for solvent parts washer waste management has been updated. This SOP is included as Attachment 04. According to Mr. Oates, all wash stations have been updated to the new standard, the updated SOP is in place, and labeled, sealed, and empty new buckets under the parts washers are in place as of July 28, 2023.

In response to the area of concern regarding wash solvent drums that were in use having loose lids and detectable emissions (area of concern #7), Mr. Oates explained in Attachment 15 that all wash solvent drums now have a sealed lid.

In response to the area of concern regarding the outstanding manifest from 2021 with no TSDF signature (area of concern #11), an explanation was provided on July 21, 2023. The explanation from Mr. Smith for the outstanding manifest is included as Attachment 16. According to this explanation letter, manifest 017837899FLE was created; however, nothing was shipped so there was no TSDF. ANC personnel reached out to their service representative (Clean Harbors) who could not locate a record of this manifest and therefore reached out to the Aragonite site in Grantsville, UT. The Utah site responded explaining that this manifest is not in their system and was never received, and that this manifest had a correction made by ANC staff. The Aragonite site does not believe this manifest shipped, as there were two similar profiles both classified as UN3175, Flam Solids, 4.1. The Aragonite site asked if it was possible that there was a miscount on manifest 017837899FLE and all of the 4.1 waste actually shipped on manifest 017837883FLE, Line 2. The Aragonite site insisted that if this waste was at their facility, it would have been identified, received, and bar coded. Mr. Smith reviewed this further with Ms. Busby and Ms. Busby explained that ANC had the drum on a pallet with other items, and the paperwork had been signed and her copy of the manifest given to her. However, as they were loading the driver noticed a dent in the drum that he felt was too large to make it safe to transport the drum. The drum was pulled from the shipment to be re-packaged for the next shipment. Ms. Busby signed the updated form but forgot to make notes on her copy of the manifest. Attachment 16 includes the initialed manifest by Ms. Busby with a zero indicating that

ANC did not ship this drum. Attachment 16 also includes the emails from the transporters and Ms. Busby, and the manifest of concern.

The facility did not respond to any of the other areas of concern.

AkzoNobel RCRA CEI Report_Signed

Final Audit Report

2023-12-21

Created:	2023-12-20
By:	Cameron Tanaka (Cameron.tanaka@erg.com)
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2023-12-21 - 12:29:56 PM GMT
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2023-12-21 - 12:30:26 PM GMT
-  Document e-signed by Justin Young (young.justin@epa.gov)
Signature Date: 2023-12-21 - 12:30:28 PM GMT - Time Source: server
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