

RCRA Inspection Report

1) Inspector and Author of Report

Mark Anthony Relon
Environmental Engineer
Phone: 404-562-9069
relon.markanthony@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Mann+Hummel Purolator Filters, LLC
(Purolator)
3200 Natal Street
Fayetteville, NC 28306

EPA ID#: NCD045917176
NAICS #: 336390 – Other Motor Vehicle Parts
Manufacturing

3) Responsible Officials

Michael Bryant
HSE Manager
michael.bryant@mann-hummel.com

4) Inspection Participants

Michael Bryant, Purolator
Doreen Paul, Purolator

Wes Hare, North Carolina Department of
Environmental Quality
Mark Anthony Relon, USEPA

5) Date of Inspection

July 10, 2023 9:00am

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; The North Carolina Solid Waste Management Law, N.C.G.S. § § 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119.

Pursuant to 15A NCAC 13A .0119(a) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

generating the waste, without a permit or without having interim status, as required by Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) to (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Mann+Hummel Purolator Filters, LLC’s compliance with the applicable requirements of RCRA and the corresponding North Carolina regulations. This was an EPA lead inspection.

8) Facility Description

Mann+Hummel Purolator Filters, LLC (hereinafter, “Purolator”) operates a motor vehicle parts manufacturing facility in Cumberland County, North Carolina. Access to the facility is controlled through a check-in front desk at the front entrance of their facility. The front desk clerk asked the purpose of the visit, requested sign in, and the contact requested relating to the visit.

General Facility Information:

- Legal owner of business: Mann & Hummel
- Legal owner of property: Mann & Hummel
- Square footage of occupied space: 864,000 square feet
- Acreage: 79 acres
- Operating shifts: Three 12-hour shifts – 24/7 operation
- Number of employees: Approximately 1000
- Water supply (municipal or well): Fayetteville PWC
- Municipal sewer/septic/ or on-site treatment on site: Fayetteville PWC
- Number of on-site water wells: None
- Groundwater monitoring wells on-site: Yes, approximately 31. In the early 2000’s a TCE investigation revealed groundwater contamination. Twelve vapor recovery wells are soon to be installed which are associated with the remediation project.
- Distance to closest off-site water well (within 1-mile or unknown): Unknown
- Closest private residence: Approximately 200 yards

The facility first notified as an LQG in February of 1990. In February of 2002 the facility dropped its generator status to SQG. Their latest notification as a SQG was on November 10, 2022. Hazardous wastes generated at the facility include, but are not limited to, the EPA waste codes D001 through D003, D005 through D009, D011, D035, F001, F003, F005, U011, U112, and U154. Purolator holds a Title V Air Permit #01757T19 and was issued on April 6, 2023, with an expiration date on October 31, 2023. The Title V Permit had a modification of including an additional oven within the operations. Purolator also holds a stormwater permit (#NC0023957) that was issued on July 1, 2021, and a DOT permit.

Mann + Hummel Purolator Filters, LLC (Purolator) has been manufacturing, marketing, and distributing filters since 1923. Ernest Sweetland and George H. Greenhalgh patented the first automotive oil filtration system. They called their invention “Purolator,” short for the words “pure oil later.” That same year, James A. Abeles converted a Twelfth Avenue garage in New York City to manufacture the product under a new company name; Motor Improvements, Inc. It was later renamed Purolator Products, Inc. and is now known as Purolator Filters NA LLC. The Fayetteville facility was started in 1967 and is the primary filter manufacturing facility for Purolator. Purolator manufactures more than 2,000 filtration part numbers for oil, air, and fuel filters used in automobiles, trucks, and heavy equipment.

Purolator has raw paper materials shipped to its facility, where it is then pleaded to create the air/oil filters. Ovens then cure the paper; the paper is cut for proper filter sizing and then put into cans or molds. The cans and molds containing the filter paper are then cured once more to properly seal the finished filter product.

Waste Streams Include:

Petroleum Distillates - D001

Petroleum Ether (used in testing) - D001

Mold Release – Heptane, Hydrocarbon Naphtha - D001

Isoparaffinic Hydrocarbons - D001

Flammable aerosols generated from empty aerosol cans - D001

9) **Previous Inspection History**

North Carolina Department of Environmental Quality (NCDEQ) has not conducted RCRA CEIs at the subject facility since August of 2015. No violations were found during the previous inspection.

10) **Opening Conference**

On July 10, 2023, EPA inspector Mark Anthony Relon, accompanied by North Carolina inspector Wes Hare, arrived at Purolator at approximately 9:00am. Doreen Paul, Safety Specialist, immediately received the inspectors. Doreen Paul, and the inspectors were joined by Michael Bryant, for the opening conference. The inspectors introduced themselves, showed their credentials to Doreen Paul and Michael Bryant, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Doreen Paul and Michael Bryant provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before facility representatives led the inspectors on a tour of the facility operations.

11) Inspection Observations

Test Lab

Purolator manages a satellite accumulation area (SAA) in their Test Lab for managing hazardous waste petroleum ether that is generated by lab testing. The inspectors observed two 4-gallon containers in this SAA. The containers were located in fume hoods, and they were equipped with a self-latching lid, which was closed. The containers were labeled hazardous waste Petroleum Ether and identified with an indication of the hazards of the contents. Although one 4-gallon container had a hazardous waste label, inspectors recommended facility personnel to replace the label due to most of the label being faded and illegible. Inspectors also recommended facility personnel to replace the other 4-gallon container's indication of the hazards of the contents due to it also being illegible. Facility personnel replaced the labels at the time of the inspection and have sent a photo through email on July 27, 2023, as proof of correction.

180-Day Storage Area/Central Accumulation Area (CAA):

Purolator manages a hazardous waste CAA in the 180-Day Storage Area. The area was identified with a sign which read "danger, hazardous waste storage." Purolator manages ignitable waste in this CAA, and the inspectors observed "No Smoking" signs.

The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

The inspectors observed one 55-gallon container in this CAA. The container was equipped with a drum cover lid, which was closed. The container was marked with an accumulation start date of June 5, 2023, labeled F003, F005, D001 hazardous waste "paint, inks, and thin," and identified with an indication of the hazards of the contents (Figure 1).

Inspectors also observed an emergency contact list posted next to their telephone (Figure 2).

12) **Records Review**

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since calendar year 2020. Hazardous waste manifest records show that D001 hazardous waste petroleum distillates, D001 hazardous waste flammable liquids are routinely shipped to Safety-Kleen Systems, Inc. (KYD053348108), and the most recent shipment was made on June 30, 2023.

Weekly Inspection Records:

The inspectors reviewed Purolator's available records of inspections of the hazardous waste CAA since calendar year 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about housekeeping, emergency communication, condition of containers, aisle space, etc. The checklist included a comprehensive list for the entire facility but did not include a sufficient amount of information pertaining to the CAA. Inspectors recommended facility personnel to include an additional checklist for the CAA. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log. No inspection records were provided for the week(s) of November 23, 2022 through January 16, 2023; January 16, 2023 through February 10, 2023; February 10, 2023 through March 1, 2023; March 1, 2023 through March 25, 2023; March 25, 2023 through April 7, 2023; April 14, 2023 through May 16, 2023; May 16, 2023 through May 26, 2023; June 1, 2023 through June 12, 2023; June 12, 2023 through June 23, 2023; March 18, 2022 through June 7, 2022.

Pursuant to [15A NCAC 13A .0107(a)] [40 C.F.R. § 262.16(b)(2)(iv)], which is a condition of the SQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

13) **Closing Conference**

The inspectors conducted the exit meeting at approximately 2:22pm with Doreen Paul and Michael Bryant. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Purolator agreed to provide new formatting for the weekly inspections, manifests, LDR records, Title V Air Permit, and photos of replaced labels. On July 14 and July 27, 2023, Michael Bryant provided new formatting for the weekly inspections, manifests, LDR records, Title V Air Permit, and photos of replaced labels in an email to Mark Anthony Relon and Wes Hare.

14) **List of Attachments**

Attachment 1 – Photo Log:

15) **Signed**

MARK ANTHONY RELON Digitally signed by MARK ANTHONY RELON
Date: 2023.09.18 14:47:08 -04'00'

Mark Anthony Relon
Environmental Engineer

16) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2023.09.18 14:56:11 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

2 Photos taken on: July 10, 2023

Photos taken by: Mark Anthony Relon

Photos taken with: Kodak PixPro Digital Camera

EPA Property Tag: SX9088

Appendix 1- Mann+Hummel Purolator Filters, LLC RCRA CEI Photographs

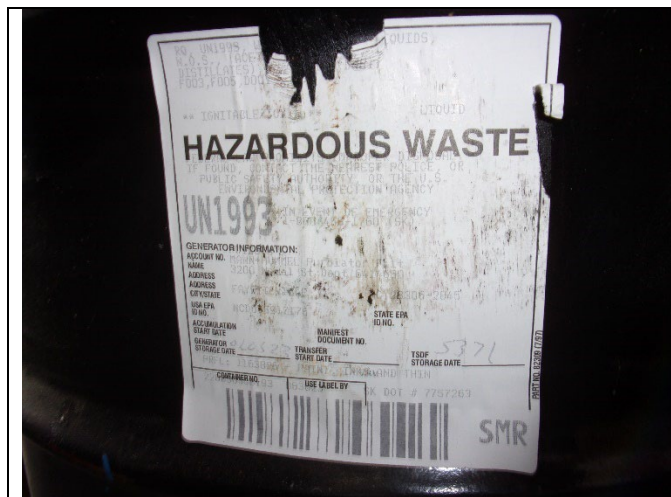


Figure 1: July 10, 2023, 10:45 AM 180-Day Storage Area/CAA
One 55-gallon container with hazardous waste label, accumulation start date, and indication of the hazards of the contents.

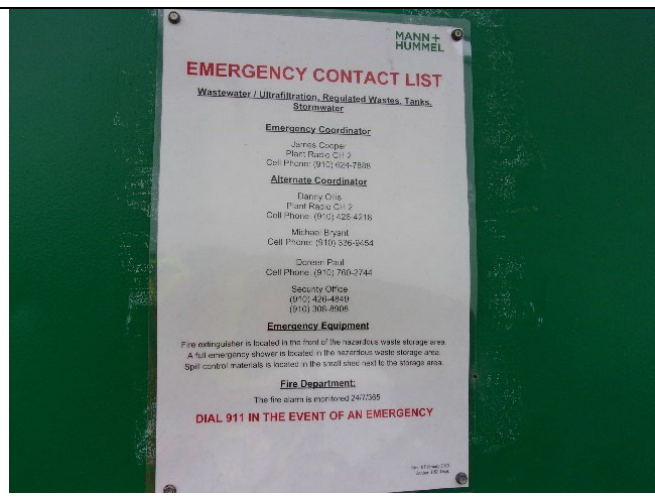


Figure 2: July 10, 2023, 10:51 AM 180-Day Storage Area/CAA
Emergency contact list posted in the 180-Day Storage Area.