

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Glasforms Inc. BLDG #6
3850 Pinson Valley Rd.
Birmingham, Alabama 35217
EPA ID No: ALR000053165

3) Responsible Officials

John Day, Regional EHS Manager
John.Day@Avient.com

4) Inspection Participants

Kayla Acosta, US EPA
Marlon McMillian, ADEM
John Day, Glasforms, Inc.
Joseph (Harry) Shaver, Glasforms, Inc.

5) Date of Inspection

November 02, 2021

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code–Annotated U.S.C.A. 6925 and 6927), 40 Code of Federal Regulation (C.F.R.), Parts 260 270, 273, 278, & 279. Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code §§ 22-30-1 et seq. 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rules 335-14-1 to 335-14-17 of the ADEM Admin. Code.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6) [40 C.F.R. § 262.16], A small quantity generator may accumulate hazardous waste on site without a permit or interim status, and

without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, or the notification requirements of section 3010 of RCRA, provided that all the conditions for exemption listed in ADEM Admin. Code r. 335-14-3-.01(6) [40 C.F.R. § 262.16] are met.

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1. [40 C.F.R. § 262.34(c)(1) (2016)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the 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 without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a) (2016)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(i)-(ii) [40 C.F.R. § 262.34(c)(1)(i)-(ii) (2016)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct a compliance evaluation inspection to determine Glasforms Inc. BLDG #6 (Glasform’s) compliance with the applicable requirements of RCRA and the corresponding ADEM regulations.

8) Previous Inspection History

The last RCRA CEI was conducted by ADEM on 01/15/2019 with no violations identified.

9) Facility Description

Glasforms is comprised of one corrugated metal building (Building #6). The facility has been in operation since 1998. The facility operates 24 hours a day, 7 days a week, with two 12-hour shifts Monday-Thursday. The facility currently has 184 employees. Glasforms also operates five separate buildings that are not contiguous to Building #6. Building #5 is registered with ADEM as a Very Small Quantity Generator (VSQG) of hazardous waste and Buildings #1-4 (EPA ID ALR000013128) is registered as a Large Quantity Generator (LQG) of hazardous waste.

Glasforms first notified as a Small Quantity Generator (SQG) of hazardous waste in 2012. They renotified as a LQG in 2013 and 2016 and again renotified as an SQG in 2016; and has remained an SQG ever since. The facility submitted their most recent notification in June 2021. Hazardous wastes identified in the report include: D001 and F003. The facility also generates universal wastes such as spent fluorescent bulbs. Glasforms operates under the NAICS Code: 326199 – All other plastics product manufacturing.

Glasforms manufactures pultruded rods, tubes, and custom profiles. Building #6 primarily manufactures larger profiles and fiberglass reinforced utility poles. Hazardous wastes consist primarily of spent acetone used in cleaning and resin waste (D001, F003). Glasforms’ operations include a pultrusion process where spools of fiberglass are pulled through a bath containing activated resin mixed with hardening agents. The resin-coated fibers are pulled through a heated

dye which molds the fiberglass into customized shapes and cures the resin. Products are then cut to desired lengths. Acetone is used when cleaning machinery and changing out the dye baths. Excess activated resin is removed from resin baths when maintenance is performed and placed into 55-gal drums referred to as “kickover drums” and moved to a “kickover shed” where they solidify and are then disposed of as non-hazardous waste. Waste profiles were available and reviewed for the kickover drums.

10) Opening Conference

On November 02, 2021, EPA inspector Kayla Acosta accompanied by ADEM inspector Marlon McMillian, arrived at Glasforms at approximately 12:30 p.m. Mr. John Day, Regional EHS Manager and Mr. Joseph (Harry) Shaver, Senior EHS Specialist received the inspectors. The inspectors had introduced themselves, showed their credentials, and explained the purpose of their visit earlier in the morning during the LQG inspection for Buildings #1-4. The inspectors described the anticipated use of a digital camera during the inspection, and 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.

Facility representatives provided an overview of the facility’s history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act’s classification of a “small business,” which is generally set by the Small Business Administration using the business’ SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspectors did not provide a copy of the agency’s information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Day and Mr. Shaver led the inspectors on a tour of the Facility operations.

11) Findings

Central Accumulation Area (CAA):

The 180-Day CAA is located in a shed right outside of Building #6. The CAA is accessed through a chain-linked fence which was locked when we approached. The inspectors observed the following hazardous wastes:

- One (1) 55-gallon drum of waste acetone. The container was closed and labeled with the words “Hazardous Waste” and marked with an indication of hazard. The drum was dated 09/23/2021. (Photos #1 and #2)

Kickover Shed:

The kickover shed is where excess resin is stored until completely solidified and then managed as non-hazardous waste. Non-hazardous waste manifests and waste profiles were requested and reviewed. No hazardous waste was observed in this area.

Building #6:

Building #6 contains pultrusion lines and a resin room which stores resin products. Resin is activated in the resin room. The resin room also has a satellite accumulation area (SAA). The inspectors observed the following hazardous waste in the resin room:

- One (1) 55-gallon SAA hazardous waste drum containing waste acetone. The container was closed and labeled with the words “Hazardous Waste” and marked with an indication of hazard. (Photo #3).

Records Review

Disposal Records:

Hazardous waste manifests were available for review going back to 2018. Original generator signed copy and final signed copy of manifests along with Land Disposal Restriction notifications were available for review.

Contingency Plan:

The actions that facility personnel should take in response to an emergency are described in the facility’s Hazardous Waste Contingency Plan which encompasses all Glasforms, Inc buildings (Buildings #1-6). It includes a list of emergency coordinators and contact information. Equipment list and capabilities addressed include fire response, spill response, and communication. The location of fire control equipment was included in the plan and identified on an evacuation map of the facility. The map also included the location of the CAA. The contingency plan also includes a Quick Reference Guide (QRG). Copies of the contingency plan with the QRG were submitted to emergency responders including the Birmingham Fire Department via email.

Employee training:

Training records for online hazardous waste training were available for review and are current.

Weekly Inspections:

Weekly container inspections were reviewed and appeared to be in order.

12) Closing Conference

An exit meeting was held at the end of the inspection with Glasforms staff to discuss preliminary conclusions and to go over any findings.

13) Inspection Findings

Based on the observations made during the inspection, Glasforms Inc. BLDG #6 appeared to demonstrate no deficiencies with RCRA requirements.

14) List of Appendices

Appendix 1 – Photo Log:

{3} Photos taken on: [11/02/2021]

Photos taken by: Kayla Acosta

Photos taken with: Olympus Tough Digital Camera

EPA Property Tag: S75903

15) **Signed**

KAYLA ACOSTA

Digitally signed by KAYLA
ACOSTA
Date: 2021.12.22 15:02:39
-05'00'

Kayla Acosta
Enforcement and Compliance Specialist

Date

Concurrence

ARACELI
CHAVEZ

Digitally signed by
ARACELI CHAVEZ
Date: 2021.12.22 15:16:59
-05'00'

Araceli Chavez
Chief
RCRA Enforcement Section

Date



Photo 1: 180-Day CAA



Photo 2: One (1) 55-gallon drum of waste acetone. The container was closed and labeled with the words “Hazardous Waste” and marked with an indication of hazard. The drum was dated 09/23/2021.



Photo 3: One (1) 55-gallon SAA hazardous waste drum containing waste acetone. The container was closed and labeled with the words "Hazardous Waste" and marked with an indication of hazard.