

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Schaeffler Group USA Inc.	Physical Address:
Mailing Address:	301 Hwy 1 S
308 Springhill Farm Rd	Cheraw, SC 29520
Fort Mill, South Carolina 29715-9784	EPA ID# SCD049128598

3) Responsible Officials

Mr. Brian Ratliff, Environmental Health and Safety Tech

4) Inspection Participants

Paige Kelly, Schaeffler Group	Tom Richmond, SCDHEC
Brian Ratliff, Schaeffler Group	Earle Watson, SCDHEC
Laurie Benton DiGaetano, USEPA	

5) Date of Inspection

August 19, 2020

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), South Carolina Hazardous Waste Management Regulations (SCHWMR) R.61-79, 260 through 270, 273, 278, & 279; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Schaeffler Group USA, Inc.'s compliance with the applicable requirements of RCRA and the corresponding SC DHEC regulations. This was an EPA lead inspection.

8) Facility Description

Schaeffler Group USA, Inc. (Schaeffler) is a global supplier of automotive and industrial

components. The company is headquartered in Fort Mill, South Carolina, and operates two manufacturing facilities in Cheraw, South Carolina. The subject Cheraw facility, located at 301 South Highway 1, was built in 1964. The facility has historically operated under the NAICS # 332291 for Ball and Roller Bearing Manufacturing, and Schaeffler currently manufactures needle bearings, cages, shells and other components here under this NAICS code. The facility has approximately 1,000 employees, and operations run 24 hours per day seven days per week.

The subject facility has continuously operated as a large quantity generator (LQG) of hazardous waste for over 30 years. Schaeffler first notified as an owner and the operator of the facility in 2005. The quarterly report data submitted by Schaeffler indicates that the following hazardous wastes were generated at the facility during calendar year 2018: D001 spent Isopar-K solvent (oil) from removing spent liquid, D001 spent shot blast from metal forming, and D001 / D002 / D007 waste chromium trioxide from discarding chemicals.

Mr. Ratliff explained that the facility is in the process of upgrading technology and replacing old washer units that have historically been used to clean oil and grime from manufactured parts and pieces using Isopar-K solvent. These washer units generate a used oil and spent solvent waste stream that has been managed as D001 spent Isopar-K solvent (oil) from removing spent liquid. According to Mr. Ratliff, the new washer units are designed to use the Isopar-K solvent more efficiently and the waste oil/solvent liquid generated in the new units will not exhibit the characteristic of ignitability. At the time of the inspection, Schaeffler had replaced one of the two old washer units. As part of the project of installing the new washer unit, Schaeffler sampled liquid waste generated from both the old and new washer units and determined that the flash point of waste samples ranged from 159° F to 171° F, above the 140° F mark set forth in the definition of ignitable waste liquids. As a result, Schaeffler ceased managing liquid waste generated in either washer unit as D001 hazardous waste as Schaeffler determined the waste to be a non-hazardous waste.

According to the quarterly reports submitted for 2020, Schaeffler shipped approximately 3,200 pounds (1,452 kilograms) of hazardous waste off-site during the first quarter (January, February and March of 2020) and 2,400 pounds (1,088 kilograms) of hazardous waste off-site during the second quarter (April, May and June of 2020). Although it appears that the facility may potentially now be generating between 100 and 1,000 kilograms of hazardous waste each month, Schaeffler's most recent re-notification to SCDHEC indicated that the facility is operating as an LQG of hazardous waste. As a result, the regulatory requirements cited in this CEI report are for accumulating hazardous waste on-site under the conditions for exemption listed in 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (the "LQG Permit Exemption").

If the facility determines that Schaeffler is generating between 100 and 1,000 kilograms of hazardous waste each month, Schaeffler may wish to submit a re-notification pursuant to 25 S.C. Code Ann. Regs. 61-79.262.18(d)(1) [40 C.F.R. § 262.18(d)(1)] and accumulate hazardous waste on-site under the conditions for exemption listed in 25 S.C. Code Ann. Regs. 61-79.262.16 [40 C.F.R. § 262.16] (the "SQG Permit Exemption").

9) **Previous Inspection History**

SCDHEC's three most recent RCRA CEIs at the subject facility were conducted on 08/19/2008, 04/18/2012, and 04/11/2016. Three or more violations of universal waste management, hazardous waste container management or hazardous waste recordkeeping requirements were cited during each CEI. SCDHEC issued a warning letter to the facility following each CEI, and the facility returned to compliance within a matter of days each time.

10) **Findings**

On August 19, 2020, the EPA inspector Laurie Benton DiGaetano, accompanied by SCDHEC inspectors Tom Richmond and Earle Watson, arrived at the Schaeffler facility at approximately 9:45 a.m. Ms. Paige Kelly, Environmental Health and Safety Specialist, immediately received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. Mr. Brian Ratliff, Environmental Health and Safety Technician, joined the inspection participants and led the inspectors on a tour of the Facility operation with Ms. Kelly.

Assembly Roll Washer Units: The inspectors observed one 55-gallon drum attached to the old washer unit (Photo #1) and another attached to the new washer unit in the K2K department. Mr. Ratliff noted that the waste generated by the old washer unit was managed as D001 spent Isopar-K solvent (oil) from removing spent liquid until the recent analytical testing confirmed that the flashpoint of the liquid waste is above 140° F for the characteristic of ignitability. The liquid waste accumulation drums were closed and labeled as non-hazardous used oil. Mr. Ratliff explained that the contents of these drums will be pumped to the on-site oil water separator. The separated water will be treated in the on-site wastewater treatment system and the used oil will be picked up by Nobel Oil. Mr. Ratliff also noted that the old washer unit is scheduled to be phased out and replaced within the next 2-3 weeks.

Finger Follower Heat Treat Area: The inspection participants observed the shot blast unit in the Finger Follower Heat Treat Area. Mr. Ratliff explained that employees use a bucket to scoop spent shot blast media from the unit and accumulate it in the designated SAA next to the unit. The inspectors observed one 55-gallon blue poly drum in the SAA (Photo #2). The drum was covered with an unlatched lid sitting on top of the drum. The waste identification label on the drum identified the contents as hazardous shot blast media blast generated by Department S-16 (Photo #3). The drum was not labeled with an indication of the hazards of this material.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(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 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 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 25 S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 25 S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 25 S.C. Code Ann. Regs. 61-79.262.15(a) [40

C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

The inspectors observed one 55-gallon red metal drum on a portable secondary containment unit in the Finger Follower Heat Treat Process Area (Photo #4). This drum is used to accumulate used oil pumped from the bottom of the process unit. The waste identification label on the drum identified the contents as hazardous used oil generated by the Safed #6 De-Oiler machine in Department S-16 (Photo #5). According to Mr. Ratliff, this drum contains non-hazardous used oil, and it was mis-labeled as hazardous.

Press Department: Schaeffler personnel use a CUDA aqueous parts washer for cleaning tools in the Press Department. The parts washer uses solvent 142 and it is serviced on-site. Spent solvents are immediately removed from the facility during service, and they are neither accumulated nor stored on-site as a waste.

Hacking Maintenance Area: Schaeffler personnel use a parts washer sink for cleaning tools in the Hacking Maintenance Area. The parts washer uses solvent 142 and it is serviced on-site. Spent solvents are immediately removed from the facility during service, and they are neither accumulated nor stored on-site as a waste.

Maintenance Area: Schaeffler personnel use two large parts washer sinks in the Maintenance Area. Spent solvents are immediately removed from the facility during service of the units, and they are neither accumulated nor stored on-site as a waste.

The inspectors observed one large battery on a wooden pallet near the parts washer units (Photo #6). The battery appeared to have leaked onto a piece of cardboard. Personnel stated that the battery came out of a tool cart in the Press Department last week, and it was staged here to be picked up when the new battery is delivered. The battery was not labeled as universal waste.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.9 [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 total of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(a)(1) [40 C.F.R. § 273.13(a)(1)], a SQHUW must contain any universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each universal waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

Contractor Storage Room: Schaeffler accumulates and stores universal waste in an outbuilding known as the Contractor Storage Room. The inspectors observed one box labeled used miscellaneous batteries dated 06/04/2020. The inspectors also observed two boxes of used 2-foot fluorescent lamps dated 08/01, and 01/04/2020; one box of used 8-foot lamps dated 03/08/2020; and four boxes of used 4-foot lamps dated 02/01/2020, 03/29/2020, 06/01/2020, and 07/01/2020 (Photo #s 7 and 8). The boxes were each labeled “used bulbs.” On the floor beneath the shelving, the inspectors observed loose and broken used fluorescent lamps (Photo #s 9 and 10).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a SQHUW must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)(2) [40 C.F.R. § 273.13(d)(2)], a SQHUW must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container or package in which such lamps are contained clearly with one of the following phrases: “Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”

The inspectors also observed one used battery on the floor next to the shelving unit (Photo #11). The battery was not labeled as universal waste.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each universal waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

Hazardous Waste Central Accumulation Area (CAA): Schaeffler manages one CAA for storing hazardous waste at the facility. The area is equipped with an emergency shower and eyewash station, with an overpack drum and spill kit, and with a fire extinguisher and no smoking sign.

According to Mr. Ratliff, the floor drains lead to an emergency holding tank in the wastewater treatment (WWT) system area, so that the material can be evaluated before pumping it into the WWT system or shipping it off-site.

Mr. Ratliff stated that the facility shipped hazardous waste off-site on Monday, and the inspectors did not observe any containers of hazardous waste in the CAA during the inspection. The containers observed in this area by the inspectors included twenty-two 55-gallon drums labeled used oil, one 55-gallon drum labeled non-RCRA grease oil trash, and four totes labeled used oil coolant from grinders.

Hazardous Waste Manifest Records: The inspectors reviewed all available hazardous waste manifest records for shipments of hazardous waste sent from the facility since January 2018. Records indicated that Schaeffler shipped D001 hazardous waste flammable solid, inorganic (manganese) to Clean Earth of Calvert City (KYD985073196) in February, April, June and August of 2020; shipped D001 hazardous waste flammable liquid (naphtha) to Univar Solutions (NCD061263315) in November and December 2019 and in February 2020; shipped D001 / U154 waste methanol to GRR Sumter (SCD036275626) in March 2020; shipped D001 hazardous waste flammable solid, inorganic (manganese) to AES Environmental (KYD985079196) in April, May, August, September, October, and December 2018, and in January, April, June, August, September, November, and December 2019; shipped D001 / D002 waste flammable liquids, corrosive (isopropanol, nitric acid) to AES Environmental (KYD985079196) in February 2019; and shipped D001 waste flammable liquid (naphtha, normal hexane) to Nexeo Solutions (NCD061263315) in August, September, October, and December 2018, and in January, February, April, June, July, August, and September 2019.

Each hazardous waste identified on the manifest records as accompanied with the associated land disposal restriction form, but several manifests did not include the final copy, which should have been signed and returned by the destination facility. The following manifests were missing this signed returned copy, and no exception records for the missing manifests were included with the manifest records: manifest 019630736JJK sent to Clean Earth of Calvert City (KYD985073196) on 02/21/20; manifests 017489599JJK (04/17/18), 017489743JJK (05/31/18), 019630072JJK (09/06/18), 019630364JJK (12/12/18), 019630478JJK (01/22/19), 019636080JJK (02/21/19), 019636227JJK (04/05/19), and 019630542JJK (12/27/19), which were sent to AES Environmental (KYD985079196) on the dates indicated in parenthesis; and manifests 019630073JJK (09/06/18), 019630240JJK (10/30/18), 019630365JJK (12/12/18), and 019636377JJK (06/04/19), which were sent to Nexeo Solutions (NCD061263315) on the dates indicated in parenthesis.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(1) [40 C.F.R. § 262.42(a)(1)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(2) [40 C.F.R. § 262.42(a)(2)], a

generator of 1,000 kilograms or greater of hazardous waste in a calendar month must submit an Exception Report to the Agency if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Contingency Plan: Schaeffler Group maintains a comprehensive Contingency Plan to cover Plants 1-6 in South Carolina. The plan lists the name, shift, position, work phone, and 24-hour phone numbers for the facility's RCRA Emergency Response Team members, including the EHS Technician, who is identified as the Emergency Response Coordinator. The plan describes the response procedures to take in the event of a hazardous waste spill, but not the procedures to take in the event of a fire or explosion. The plan includes an emergency evacuation diagram, which also identifies the locations of fire extinguishers available throughout the facility, and it includes an inventory of items to be contained in each one of eight spill kits and identifies where those spill kits are located; however, this list of emergency response equipment does not include a physical description of the equipment or a brief outline of its capabilities.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.261(a) [40 C.F.R. § 262.261(a)], and is a condition of the LQG Permit Exemption, the contingency plan must describe the actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.261(e) [40 C.F.R. § 262.261(e)], and is a condition of the LQG Permit Exemption, the contingency plan must include a list of all emergency equipment at the facility where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan was last updated on 10/08/2019, but the records provided following the inspection indicate that it was last provided to the Cheraw Fire Department, Ambulance Service, Police Department, Sheriff's Department, Highway Patrol, General Chesterfield Hospital, Marlboro Park Hospital, and the County Emergency Response Coordinator in 1998. The plan did not include a quick reference guide.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)],

which incorporates 25 S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a generator is required to submit a copy of the contingency plan and all revisions to all local emergency responders. This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a generator that is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders or, as appropriate, the Local Emergency Planning Committee.

Hazardous Waste Training: Job titles, job descriptions, and the names of employees filling those positions were provided for personnel with RCRA hazardous waste management responsibilities. Annual RCRA training records indicated that these employees completed the required RCRA training in 2017, 2018 and 2019.

Weekly Inspections: The inspectors reviewed records of weekly inspections of the hazardous waste storage area for the past three years. The records did not include the time that the weekly inspection was performed, which is required by state regulations.

11) **Out-Briefing**

The inspectors conducted the exit meeting with Mr. Ratliff and Ms. Kelly. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

12) **Conclusion**

Based on the observations made during the inspection, Schaeffler Group USA Inc. appeared to be deficient with the following requirements:

- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.261(a) [40 C.F.R. § 262.261(a)], and is a condition of the LQG Permit Exemption, the contingency plan must describe the actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.261(e) [40 C.F.R.

§ 262.261(e)], and is a condition of the LQG Permit Exemption, the contingency plan must include a list of all emergency equipment at the facility where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a generator is required to submit a copy of the contingency plan and all revisions to all local emergency responders. This document may also be submitted to the Local Emergency Planning Committee, as appropriate.**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a generator that is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders or, as appropriate, the Local Emergency Planning Committee.**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(1) [40 C.F.R. § 262.42(a)(1)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(2) [40 C.F.R. § 262.42(a)(2)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month must submit an Exception Report to the Agency if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each universal waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(a)(1) [40 C.F.R. § 273.13(a)(1)], a SQHUW must contain any universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.**

- Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a SQHUW must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)(2) [40 C.F.R. § 273.13(d)(2)], a SQHUW must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container or package in which such lamps are contained clearly with one of the following phrases: “Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”

13) **Signed**

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

Date

Concurrence

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Date



Photo 1: 55-gallon drum attached to the old assembly roll washer unit. The drum is labeled as non-hazardous used oil.



Photo 2: 55-gallon blue poly drum in the spent shot blast media SAA. The ring is not latched to secure the lid on top of the drum.

Schaeffler Group USA Inc.
RCRA CEI Photographs
Laurie Benton DiGaetano, EPA



Photo 3: 55-gallon blue poly drum in the spent shot blast media SAA. The waste identification label identifies the material as hazardous shot blast media blast.



Photo 4: 55-gallon red metal drum in the Finger Follower Heat Treat Process Area. The drum is used to accumulate used oil pumped from the bottom of the Safed #6 De-Oiler machine.



Photo 5: 55-gallon red metal drum in the Finger Follower Heat Treat Process Area. The waste identification label identifies the material as hazardous used oil, but Mr. Ratliff explained that the container of non-hazardous waste oil was mis-labeled.



Photo 6: Large battery taken from a tool cart in the Press Department. Staged in the Maintenance Area. The battery appeared to be leaking, and it was not labeled as universal waste.



Photo 7: Boxes of universal waste observed in the Contractor Storage Room.



Photo 8: Boxes of universal waste observed in the Contractor Storage Room.



Photo 9: Broken glass from fluorescent bulbs located on the floor beneath the shelving unit holding universal waste in the Contractor Storage Room.



Photo 10: Broken glass from fluorescent bulbs located on the floor beneath the shelving unit holding universal waste in the Contractor Storage Room.



Photo 11: One used battery located on the floor next to the shelving unit in the Contractor Storage Room.