

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Hickory White Case Goods	<u>Mailing Address:</u>
9 Lenoir Rhyne Blvd	P.O. Box 189
Hickory, North Carolina 28602	Hickory, North Carolina 28603

EPA ID# NCD003217536

3) Responsible Officials

William Smith, Vice President of Operations

4) Inspection Participants

Kim White, Hickory White	Nick Guglielmi, NCDEQ
William Smith, Hickory White	Laurie Benton DiGaetano, USEPA

5) Date of Inspection

May 25, 2021

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), Title 15A of the North Carolina Administrative Code (NCAC), Chapter 13; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

Pursuant to 15A NCAC 13A .0102(b) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

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 generating the waste, without a permit or without having interim status, as required by 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (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(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 15A NCAC 13A .0119(b) [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.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Hickory White Case Goods’ compliance with the applicable requirements of RCRA and the corresponding NCDEQ regulations. This was an EPA lead inspection.

8) Previous Inspection History

NCDEQ has conducted seven RCRA CEIs at the subject facility since 2009. NCDEQ issued a ticket notice of violations (TNOV) on 08/29/2014 and another TNOV on 03/20/2017 to resolve violations observed during the 07/24/2014 and 01/30/2017 CEIs, respectively. No violations were observed during the remaining CEIs since 2008. On 05/13/2019, NCDEQ conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA’s requirements.

9) Facility Description

Operations at the subject facility started in 1902 when the Hickory Manufacturing Company began making wooden bedroom furniture at this location. In 1988, the Hickory Manufacturing Company joined forces with the White Furniture Company, and they consolidated operations at the subject facility as the Hickory White Company. Hickory White became a subsidiary of the Sherrill Furniture Company in 1997, and currently operates approximately five furniture manufacturing plants in Hickory, North Carolina and the surrounding area.

The subject facility is located on a 13-acre tract of land in Hickory, North Carolina. It includes one primary manufacturing building, which occupies approximately 471,186 square feet. The Hickory White Company (“Hickory White”) manufactures household wood case goods and occasional furniture under the NAICS Code 337122 for Non-Upholstered Wood Household Furniture manufacturing at this location. The facility has approximately 200 employees, and operations run on one shift, five days per week. Hickory White has been operating as a large quantity generator (LQG) of hazardous waste at this location for well over thirty years. The company most recently notified as an LQG of hazardous waste as part of the biennial report on 01/13/2020. The only hazardous waste identified in the report was D001 / F003 / F005 hazardous waste flammable liquid (acetone / toluene).

The on-site manufacturing process begins by rough milling wooden slabs and machining specific parts and panels, which are sanded and assembled to create an unfinished piece of furniture. Unfinished pieces

are transferred from the Cabinet Room to the Finishing Room, where employees apply wood finishes to the pieces using spray booths, paint brushes, and/or rags. The Finishing Room houses a total of 21 spray booths for applying wood finish products such as paint, stain and/or sealer. At time of the inspection, one of the booths was used only for storage and not for finishing operations. Six of the spray booths are located along the outer wall of the Finishing Room, and individual pieces are brought to these booths for finishing applications. An automated track carries furniture pieces past the series of fourteen remaining spray booths, which are staged in the center of the Finishing Room. Furniture pieces are placed onto rectangular platforms, which are slowly carried along the automated track. The track continuously runs during finishing operations, snaking back and forth along the process line and passing by each of the on-line spray booths. Furniture pieces traveling along the line are accompanied by instructions that indicate which of the finishing products should be applied to the piece as it travels past the spray booths.

Lacquers and thinners are pumped from 3,000-gallon tanks to a pump attached to the Finishing Department. Select finishes are pumped directly from 55-gallon drums in the Pump House to the individual spray booths in the Finishing Room. Each morning, liquids in the spray lines are recirculated in order to clear the lines and prepare them for use. When it is necessary to clean the lines for a color change or other event, clean solvent is pumped through the recirculation line and accumulated in a 55-gallon drum at the Pump Room hazardous waste satellite accumulation area (SAA) where it is managed as D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene).

Although some material is pumped directly from 55-gallon drums in the Pump House to the individual spray booths in the Finishing Room, most of the 69 available colors are applied using 5-gallon buckets at specific spray booths in order to avoid the need to clean the entire spray line and generate significant waste from flushing the entire line. Spray lines at each booth must still be cleaned between color changes, and the spent solvents generated by cleaning the spray booth lines are initially accumulated in a 5-gallon bucket at the associated spray booth. Supervisors evaluate this material daily and determine if it can be used as “backing stain” on hidden portions of the furniture which do not require a specified finish. If the supervisor determines that spent solvents in a 5-gallon bucket are not suitable for use as backing stain, employees pour the material into a 55-gallon drum at the Finishing Room hazardous waste SAA where it is managed as D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene).

The spray booths are equipped with reusable filters, which are swept and washed approximately once each week. Hickory White manages two solvent dip tanks in the Wash Off Area for cleaning furniture and these booth filters. Virgin solvent is placed into the first dip tank, which is a shallow tank holding approximately 100 gallons of liquid. This solvent is used to strip finish from furniture pieces that do not meet quality control specifications, so that the piece can be returned to the Finish Room. Once the bare wood of the piece has been exposed, the piece returns to the finishing line for reworking. Solvent in the first dip tank eventually becomes too contaminated for continued use for furniture stripping. The spent solvent is then drained from the first dip tank and transferred to the second, deeper tank where it is used to clean reusable booth filters. Dirty booth filters are soaked and cleaned in the second dip tank. Spent solvent generated in the second dip tank is periodically drained from the unit and accumulated in a 55-gallon drum at the Wash Up Area hazardous waste SAA where it is managed as D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene).

Hickory White manages one hazardous waste central accumulation area (CAA) on a covered concrete pad located just outside of the manufacturing building. Full 55-gallon drums of hazardous waste are transferred from the SAAs to this area for storage until they are shipped off-site. Hickory White also stores 55-gallon drums of universal waste aerosols and excluded solvent contaminated wipes in this general area. Used aerosol cans generated throughout the facility are accumulated as universal waste (UHW) in a 55-gallon drum located in the Finishing Room. When this drum is full, it is brought to the CAA for storage until it is shipped off-site. Hickory White also generates solvent contaminated wipes

from wiping stains in the Finishing Room and cleaning pieces of furniture in the Wash Off Area. The facility has contracted with Kleen-Tech Services Corporation, to pick up, launder, and return rags as part of the Solvent Contaminated Reusable Wipe Exclusion.

10) **Opening Conference**

On May 25, 2021, EPA inspector Laurie Benton DiGaetano, accompanied by NCDEQ inspector Nick Guglielmi, arrived at the subject Hickory White Case Goods facility at approximately 9:30 a.m. Ms. Kim White, Environmental Manager, immediately received the inspectors. Ms. White and the inspectors were joined by Mr. William Smith, Vice President of Operations, for the opening conference and inspection tour. The inspectors introduced themselves, showed their credentials to Ms. White and Mr. Smith, and explained the purpose of the visit.

Ms. White and Mr. Smith provided an overview of the facility's history and current operations during the opening conference. The EPA inspector noted 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, but the inspection participants did not determine whether or not the company meets this classification. The EPA inspector did not provide a copy of the agency's information sheet for small businesses, but this sheet can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The inspectors 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. The inspection participants also discussed the anticipated use of a digital camera, the health and safety protocols, and the required personal protective equipment before Ms. White and Mr. Smith led the inspectors on a tour of the facility operations.

11) **Findings**

Finishing Room SAA, Excluded Wipes and UHW: The facility tour began in the Finishing Room, where the inspectors observed employees applying wood finishes to furniture pieces using spray booths, paint brushes, and/or rags. Hickory White manages one hazardous waste SAA for accumulating spent solvents in this area. The inspectors observed one 55-gallon drum, which was labeled D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene), identified with flammable liquid and toxic DOT hazard placards, and dated 05/21/2021. The drum was closed, and it was in good condition. Facility personnel indicated that, on average, it takes a couple days to fill one 55-gallon drum in this SAA.

The inspectors also observed one 55-gallon drum for accumulating rags that have been used to wipe stains and finishes that have been applied to the furniture pieces. A lid was sitting on top of the drum, and the drum was labeled excluded solvent contaminated wipes.

The inspectors observed one 55-gallon drum for accumulating used aerosol cans in the Finishing Room. The drum was closed, labeled universal waste aerosols, and identified with a flammable gas DOT hazard placard.

Wash-Off SAA: Hickory White manages two solvent dip tanks in the Wash Off Area for cleaning furniture and booth filters. The inspectors observed both solvent dip tanks during the facility tour. Each tank was equipped with a hinged lid to provide access to the tank as needed. Virgin solvent is placed into the first dip tank where it is used to strip finish from furniture pieces. Spent solvent generated in the first tank is periodically transferred to the second dip tank where it is used to clean booth filters. Spent solvent generated in the second tank is accumulated as hazardous waste in the Wash-Off SAA. The inspectors

observed one 55-gallon drum in this SAA. The drum was closed, labeled D001 / F003 / F005 hazardous waste flammable liquids, and identified with flammable liquid and toxic DOT hazard placards.

Oil Room: Hickory White manages both waste oil and virgin oil in a small room located outside of the production area. Waste oil is generated from maintenance activities performed on various machines throughout the facility. The track that is used to carry furniture pieces through the Finishing Room generates an oil and grease waste, which is heavily contaminated with dirt and debris. This waste is not managed as used oil for recycling, but as a waste oil sent for disposal. The inspectors observed three 55-gallon drums of waste oil in this room during the inspection. All drums were labeled as nonhazardous dirty oil / track sludge. One drum had open bungs on the lid.

The inspectors also observed an open-top 5-gallon bucket just inside the door to the Oil Room. The bucket was a little over ½ full of an unknown blue-ish liquid. Facility personnel stated that someone must have brought the bucket to this area, and the contents might be waste oil.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Pump Room SAA: Select finishes are pumped directly from 55-gallon drums in the Pump House to the individual spray booths in the Finishing Room. When it is necessary to clean the lines for a color change or other event, approximately 15 gallons of clean solvent is pumped through the recirculation line and accumulated in the Pump Room SAA. The inspectors observed one 55-gallon drum in this SAA. The drum was closed with a latched funnel, labeled D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene), identified with flammable liquid and toxic DOT hazard placards, and dated 05/25/2021.

Hazardous Waste Central Accumulation Area (CAA): Hickory White manages one hazardous waste central accumulation area (CAA) on a covered concrete pad located just outside of the manufacturing building. Hickory White manages ignitable waste in this CAA, and the inspectors observed a “No Smoking” sign on the wall in this area. The area is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; a fire alarm pull station; a telephone capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and automatic sprinklers.

The inspectors observed ten 55-gallon drums in one corner within the designated hazardous waste CAA. Nine of these drums were labeled D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene) and identified with flammable liquid and toxic DOT hazard placards. All of these drums were marked with an accumulation start date, and the oldest drum was dated 04/16/2021. The last drum was labeled nonregulated waste flammable solids (nitrocellulose) and identified with a flammable solid DOT hazard placard.

The inspectors also observed two 55-gallon drums in another corner of this area. The drums were closed, labeled universal waste aerosols, and identified with a flammable gas DOT hazard placard. According to the records provided during the inspection, the facility sent three shipments of universal waste aerosols to Environmental Enterprises (OHD083377010) since October 2020, and the most recent shipment of universal waste aerosols was sent on 03/15/2021.

Finally, the inspectors observed eleven 55-gallon drums labeled excluded solvent contaminated wipes staged on the ground next to the secondary containment area. Nine of these drums were staged together just outside to the secondary containment. These drums appeared to contain clean rags that had been returned by Kleen-Tech for use at the facility. Several of the rings used to secure lids to drums were bent out of shape and poorly fitted to the containers. Another drum was located alone near the chain link fence. This drum appeared to be full of dirty solvent wipes ready for shipment to Kleen-Tech. The ring used to secure the lid to the drum was bent out of shape and poorly fitted to the container. The last drum was located near the ramp leading into the secondary containment. This drum appeared to be partially (about ½) full of dirty solvent wipes. The drum lid was sitting loosely on top of the container. Facility personnel explained that dirty solvent wipes pose a combustion hazard and cannot be left inside overnight. At the end of each workday, personnel place the dirty rags into 55-gallon drums and bring the drums to this area to be staged outside overnight.

Contingency Plan: The actions that facility personnel should take in response to an emergency are described in the HWS Company, Inc. dba Hickory White, a Division of Sherrill Furniture Co. Hazardous Waste Generator Contingency Plan, which was last updated on 01/13/2021. The plan describes actions facility personnel must take in response to an emergency and the arrangements agreed to with the Hickory Fire Department, the Hickory Police Department, the Frye Regional Medical Center, and the Catawba County Emergency Services. The plan lists the name and emergency telephone number for the primary and secondary emergency coordinators, and it includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, automatic sprinkler systems and alarms, emergency eyewash and shower units, alarm pull stations, and spill control equipment. The plan also includes an evacuation plan for personnel.

Although the contingency plan was updated on 01/13/2021, copy of the plan was most recently submitted to the Hickory Fire Department, the Hickory Police Department, the Catawba County Emergency Services, and the Frye Regional Medical Center on 04/07/2017. According to facility personnel, the only change made to the contingency plan following the 04/07/2017 submission was an update to the list of supervisors at the facility. However, the current contingency plan also included a quick reference guide, which was not submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, an LQG that is amending its contingency plan must, at that time, submit a quick reference guide of the contingency plan to the local emergency responders.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; a street map of the facility in relation to surrounding businesses, schools and residential areas; and the name of the emergency coordinator(s) and emergency telephone number(s). The quick reference guide does not include a map of the facility showing where hazardous wastes are generated, accumulated, and treated and routes for accessing these wastes; the locations of water supply; or the identification of on-site notification systems.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, the quick reference guide must include: (4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (6) the locations of water supply; and (7) the identification of on-site notification systems.

Training Records: The inspectors reviewed facility job descriptions and employee names that were provided for employees with hazardous waste management duties. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. Ms. Kim White, the Emergency Coordinator and training instructor, attended the NCDEQ hazardous waste generator workshop on 05/21/2020 and 05/13/2021. The inspectors reviewed records of employee hazard communication, hazardous waste management and disposal, hazmat and fire extinguisher training completed on 09/25/2017, 09/25/2018, and 09/27/2019. The hazardous waste training planned for 10/06/2020, was canceled due to COVID shut-down, lower employee attendance rates, social distancing protocols, and decontamination requirements. The next training is scheduled for 06/15/2021.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part.

Waste Manifest Records: The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 01/01/2019. Hazardous waste manifest records show that a shipment of D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene) is sent to Clean Earth Environmental (ALD981020894) once every one-to-two months. Volumes of hazardous waste range between six and twenty-one 55-gallon drums, with an average of 13 drums per shipment. The most recent shipment contained fifteen 55-gallon drums of D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene) sent to Clean Earth Environmental (ALD981020894) on 05/05/2021. Hazardous waste manifest records also included one shipment of one 55-gallon drum of D001 / F003 / F005 waste flammable liquid (toluene / acetone) sent to GRR Sumter (SCD036275626) on 01/26/2021.

Solvent Contaminated Wipes: Hickory White provided records documenting the frequency of shipments of solvent-contaminated wipes being sent off-site for laundering or dry-cleaning. Shipments of excluded solvent contaminated rags are sent to Kleen-Tech in Morganton, North Carolina. The facility did not provide documentation of the name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day time limit in 40 C.F.R. § 261.4(a)(26)(ii) is being met; or a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(v)(A), (B), and (C)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that generators maintain at their site the following documentation at their site: name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day accumulation time limit in 40 C.F.R. § 261.4(a)(26)(ii) is being met; and description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.

Inspection Records: Hickory White provided records of inspections of the hazardous waste CAA as far back as 2011. The inspectors reviewed the available records of inspections of the CAA, the Finishing Room SAA and the Wash-Off Tank SAA between 12/17/2018 and 05/24/2021. 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 drum integrity, drums closed, all waste inside drums, drum label and date, aisle space, and spill control

equipment. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection.

12) Closing Conference

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

13) Inspection Findings

Based on the observations made during the inspection, Hickory White was apparently deficient with the following RCRA requirements:

- Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(v)(A), (B), and (C)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that generators maintain at their site the following documentation at their site: name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day accumulation time limit in 40 C.F.R. § 261.4(a)(26)(ii) is being met; and description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.
- Pursuant to Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, an LQG that is amending its contingency plan must, at that time, submit a quick reference guide of the contingency plan to the local emergency responders. The quick reference guide must include: (4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (6) the locations of water supply; and (7) the identification of on-site notification systems.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part.

14) Signed

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

Concurrence

Araceli B. Chavez
Chief
RCRA Enforcement Section