

RCRA Inspection Report

1) Inspector and Author of Report

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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

Hydro Extrusion USA, LLC
2905 Old Oakwood Road
Gainesville, GA 30504

EPA ID#: GAD981238199
NAICS #: 331318 – Other Aluminum Rolling,
Drawing, and Extruding

3) Responsible Official

Don Leamon
Health, Safety, & Environmental Manager
Don.Leamon@hydro.com

4) Inspection Participants

Don Leamon, Hydro Extrusion USA, LLC
Kaleb Saxion, Hydro Extrusion USA, LLC
Laura McGaha, Hydro Extrusion USA, LLC
Sara Porter, Georgia Environmental Protection Division (GAEPD)
Kayla Acosta, U.S. Environmental Protection Agency (USEPA)
Paula Whiting, USEPA
Daniel McCay, USEPA

5) Date of Inspection

May 18, 2023, at 9:00 am

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; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66

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.

[Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (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 (CEI) to determine Hydro Extrusion USA, LLC’s (known hereinafter as “Hydro Extrusion” or “the facility”) compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

According to their website, Hydro is an industrial company that develops natural resources into products and solutions. The company is involved in a broad range of market segments such as aluminum, energy, metal recycling, renewables, and batteries. The company started in 1905 and has 140 locations worldwide. Hydro Extrusion in Gainesville, GA provides extrusion, machining, fabrication, and finishing services. The facility also provides in-house extrusion paint lines.

Hydro Extrusion specializes in aluminum extrusion for commercial and residential doors and truck trailers. Aluminum is brought to the facility in trailers. Aluminum then goes through an extrusion machine to be cut into the desired shape. The extruded aluminum is then placed in an oven for hardening. After the oven, the extruded aluminum is either complete or it goes through one of two painting lines (depending on the customer request). Extruded metals that are to be painted are placed on rollers and moved to the paint lines where the extruded metals are hung up on overhead conveyors and go through a washing process before getting painted. There are two paint lines, one powder line (currently being retrofitted to be an automated line) and one wet line. Rinse water from the powder line goes to the facility’s onsite wastewater treatment plant (WWTP). After painting, the metals are placed in a paint oven for drying and hardening.

The facility is approximately 375,000 square feet in size and is comprised of one production plant building. Hydro Extrusion employs approximately 200 employees and operates two 12-hr

shifts seven days a week. The facility has controlled access through a gated entry operated by a security guard.

The facility has been operating as a large quantity generator (LQG) of hazardous waste since 1990 when it was under different ownership as Indal Extrusion. In 2009 the facility changed ownership and registered under a new name, Sapa Extruder, Inc., and in 2018 the facility changed ownership and became Hydro Extrusion USA, LLC. The facility submitted its most recent notification of hazardous waste activity along with its biennial report on March 1, 2022. Hazardous waste generated onsite include the following EPA waste codes: D001 (paint-related waste and paint-booth filters), D002 (sodium hydroxide waste and corrosive waste), D007 (chromium waste), D035 (methyl ethyl ketone), F003, and F005 (solvent waste), and F019 (filter cake waste). The facility also generates used oil and universal waste: batteries, mercury lamps, and aerosol cans. The facility has a wastewater treatment plant to treat wash water from the powder paint line. The treated water is discharged to the city of Gainesville's Public Owned Treatment Works (POTW).

The Facility has a wastewater treatment permit with the city of Gainesville, Permit No. 0046 which expires on December 31, 2025. The facility also has a Title V air permit with GAEPD, permit No. 3354-1390075-V05-0. The Title V permit application was sent in February of this year for permit renewal. The facility also has an NPDES Permit issued by GAEPD, permit No. GAR050000, with an expiration date of May 31, 2027.

9) **Previous Inspection History**

GAEPD has conducted one RCRA CEI at the subject facility between 2018 and 2023 and found five violations during that inspection.

On January 10, 2018, GAEPD conducted the most recent RCRA CEI at the subject facility which resulted in five apparent RCRA violations identified. The facility returned to compliance with an informal enforcement action dated February 19, 2018. The following five violations were identified:

- 40 C.F.R. 273.B - Standards for Universal Waste Management: Standards for Small Quantity Handlers: 40 C.F.R. 273.14(a) Each battery, or a container in which the batteries are contained, must be labeled or marked clearly with Universal Waste—Battery(ies) or Waste Battery(ies) or Used Battery(ies).
- 40 C.F.R. 273.B - Standards for Universal Waste Management: Standards for Small Quantity Handlers: 40 C.F.R. 273.14(e) Each lamp or container in which lamps are contained must be clearly labeled or marked with Universal Waste Lamp(s) or Waste Lamp(s) or Used Lamp(s)
- 40 C.F.R. 273.B - Standards for Universal Waste Management: Standards for Small Quantity Handlers: 40 C.F.R. 273.13(d)(1) Lamps must be in containers that are structurally sound, adequate to prevent breakage & compatible; containers must remain closed and lack evidence of leakage, spillage or damage that could cause leakage.
- 40 C.F.R. 262.A - Standards Applicable to Generators of HW: General: 40 C.F.R. 262.15 Satellite accumulation area (SAA) requirements: up to 55 gal. of hazardous waste or 1 qt. acutely hazardous waste at point of generation; provisions which must be complied with; procedure of quantity.

- 40 C.F.R. 262.A - Standards Applicable to Generators of HW: General: 40 C.F.R. 262.17(a)(5)(i)(c) Date each period of accumulation begins is marked and visible on each LQG container.

10) **Opening Conference**

On May 18, 2023, EPA inspector Kayla Acosta, accompanied by Paula Whiting and Daniel McCay of USEPA's Laboratory Services & Applied Science Division, and GAEPD inspector Sara Porter, arrived at Hydro Extrusion at approximately 9:00 am. Don Leamon, Health Safety, & Environmental Manager immediately received the inspectors. Don Leamon, and the inspectors were joined by Kaleb Saxion, for the opening conference. The inspectors introduced themselves, showed their credentials, 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.

Don Leamon 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**

Universal Waste Storage 1:

The universal waste storage is kept in the Press 5 Area (part of the extrusion process area). The inspectors observed the following (Photos 1-4):

- One (1) cubic yard cardboard box labeled Electronic Waste, closed, and dated 08/03/22
- One (1) 2-gallon container labeled Universal Waste Batteries, closed, and dated 04/24/23
- One (1) 2-gallon container labeled Universal Waste Mercury-containing Equipment, closed, and dated 06/21/22
- One (1) cubic yard cardboard box labeled Universal Waste - Lamps, closed, and dated 05/12/23

Several feet away from the universal waste storage area was a closed 5-gallon red container labeled "Oily Waste Can" (Photo 5). These containers are used to hold used oily rags. It was recommended to the facility staff to label these containers with the words "used oil rags" or "used oily rags" so that it is made clear that only rags containing used oil are placed in these containers. On 05/23/2023 Laura McGaha, Southeast Regional Environmental Systems Engineer for Hydro Extrusion sent an email to the inspectors with a photo of the red can with a new "oily rags" label.

Maintenance Area:

The maintenance area contains tools and parts that are used to maintain machinery and equipment inside the facility. There is an Aramark Towel Manager station where soiled towels (just containing dirt) are collected, and clean towels can be retrieved (Photo 6). No hazardous waste was observed in this area.

Universal Waste Storage Area 2:

Near to the extrusion preparation area is a second universal waste storage area. Universal waste aerosol cans are stored in this area. The inspectors observed one (1) cubic yard cardboard box labeled Universal Waste – Aerosol Can(s), dated 05/12/23, and partially open (Photo 7). The container had a lid on it, but the lid was not properly fitted and placed on top of the box to securely close it. It did not appear that anyone was adding or removing universal waste from the container. Facility representatives could not access the area at the time of the inspection to properly secure the lid due to it being a hot work area where maintenance was being conducted with overhead machinery several feet away from the universal waste storage area.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. §40 C.F.R. 273.13(e)], a small quantity handler of universal waste must manage universal waste aerosol cans in a way that prevents releases of any universal waste or component of a universal waste to the environment.

On 05/23/2023, Laura McGaha sent an email to the inspectors with a photo of the container securely closed (Photo 30).

Extrusion Press:

Next to an extrusion press machine was a 350-gallon, double-walled above ground storage tank (AST) for used oil (Photo 8). Used oil is generated from pits under the extrusion press which is then pumped into the AST. The AST was labeled with the words “Used Oil” and appeared in good condition with no signs of leaks or deterioration. There was also another Aramark Towel Manager station. No hazardous waste was observed in this area.

Paint Line 3 – Powder Line:

Paint line 3 is currently down since it is currently being retrofitted to be an automated paint line. Extruded metals go through a washer before getting painted. The wash water is sent to the WWTP. Paint from the Powder Line has been analyzed by Pace Analytical and was determined to be non-hazardous. The analytical report dated October 20, 2020, was reviewed during the records review. No hazardous waste was observed in this area.

Paint Line 2 – Wet Line with a (SAA):

There are four paint booths for the wet line, two paint booths per side with a paint room in between for the operator to oversee painting operations. Electronics are not allowed in this area; therefore, photos could not be taken with the digital camera. The paint room has a red can for rags but was not labeled to indicate if the rags were new or used. Facility representatives stated these rags are new rags and that used solvent-contaminated rags are disposed of with paint-

related waste in a hazardous waste container. The inspectors recommended labeling the red container to indicate that it contains only new rags.

The paint booths have a positive pressure system where emissions are directed to a thermal oxidizer. The positive pressure inside the paint booths and the thermal oxidizer are under 24/7 monitoring. The extruded metal goes through the paint booths by way of the overhead conveyor while residual paint and paint sludge is diverted into hazardous waste drums. The facility manages a SAA in each paint booth for hazardous waste generated here including paint still bottoms, paint line flushing waste, and paint booth filters. The inspectors were only able to enter one side of the paint booths since the other two paint booths were actively in-use.

There are seven (7) hazardous waste drums per each side (two paint booths per side). Each side contains the following hazardous waste satellite containers:

- Four (4) 55-gallon drums for paint still bottom waste (two drums are actively collecting dripping paint sludge while the other two drums were empty ready to swap places)
- Two (2) 55-gallon drums for flushing waste
- One (1) 55-gallon drum for used paint booth filters shared between the two booths

The drums that were in view inside the active paint booths had hazardous waste labels and marked with an indication of hazard. Most of the hazardous waste drums appeared to be closed. Two (2) 55-gallon drums for still bottoms that were actively collecting paint sludge had lids with holes in them.

The inspectors were allowed to enter the two paint booths on the other side of the paint room. Here the inspectors observed four (4) 55-gallon drums of hazardous waste still bottom, labeled “Hazardous Waste and marked with an indication of hazard”. One drum for each paint booth was in position to actively collect still bottoms while the two drums were empty. The four drums had the same type of lid with an open hole for collecting paint sludge (Photo 9) taken by GAEPD with an iPhone on airplane mode).

Facility representatives explained that dripping paint from the paint booths and paint sludge is constant and so the paint sludge is continuously pouring into the drums which is why the containers collecting paint sludge (still bottoms) have holes in them. Once full, employees replace the lids with one that completely seals the container and is then moved to the central accumulation area CAA.

The SAA Permit Exemption requires hazardous waste containers to be closed at all times unless the facility is actively adding or removing hazardous waste from an open container. The two (2) 55-gallon drums in the paint booths that were not in-use did not appear to be collecting paint sludge (Photo 9).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. 262.15(a)(4)] a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.

Since the facility operates 24/7, an employee should be monitoring the paint sludge entering the hazardous waste drums and replace the lids with holes with a completely sealed closed lid when

paint sludge appears to no longer be depositing into the drum. Although the paint booths are equipped with an air emission control device, hazardous waste containers are required to be properly closed at all times unless adding or removing waste.

At this point during the inspection, Laura McGaha, joined the inspection.

Just outside of the paint booth area and paint room was an SAA. The inspectors observed the following:

- One (1) 55-gallon drum of paint debris solids (filters), labeled “Hazardous Waste”, the drum was closed, and marked with an indication of hazard (Photo 10)
- One (1) 55-gallon drum of paint debris solids (filters), labeled “Hazardous Waste”, marked with an indication of hazard, and slightly open (Photo 11)
- One (1) 5-gallon container of solvent rags (managed as hazardous waste). The container was closed, with no label, and no indication of hazard (Photo 12).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)] a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.

Facility representatives immediately retrieved a ring for the drum and properly secured and closed the drum.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. §262.15(a)(5)(i)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (i) The words “Hazardous Waste”.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. §262.15(a)(5)(ii)], which is a condition of the SAA permit exemption, a generator must mark or label its container with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Paint Mix Room and SAA:

Paint products are mixed here. There is a Clean Planet Chemical Xylene recovery unit that recovers xylene solvent from the flushing of paint lines (Photo 13). Clean Planet services the machine on a monthly basis. The paint mix room is also connected to the thermal oxidizer. The inspectors observed the following waste:

- Two (2) 5-gallon red cans for oily rags that were closed.
- Two (2) 55-gallon drums of paint line flushing (from two different paint lines), properly closed, labeled “Hazardous Waste”, and marked with an indication of hazard (Photo 14)

- One (1) 55-gallon drum of waste sludge (still bottom), labeled “Hazardous Waste”, marked with an indication of hazard, and not securely closed with a drum ring (Photo 15).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)] a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.

Facility representatives immediately retrieved a ring for the drum and properly secured and closed the drum.

Central Accumulation Area (CAA) for Drum Waste:

This CAA is located outside on the southeast side of the facility right next to the WWTP. This CAA is used to store hazardous waste in drums. The facility manages ignitable waste in this CAA, and the inspectors observed a “No Smoking” sign at the entrance of the CAA (Photos 16 and 17). The CAA is equipped with an internal communications 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 and spill control equipment; and it is equipped with water to supply water hose streams.

The inspectors observed 17 55-gallon drums of hazardous waste (Photos 18 and 19). Drums had adequate aisle space to inspect each drum and were all properly closed. The drums were all labeled “Hazardous Waste” with EPA waste codes and content information. The drums were all marked with an indication of hazard for flammability. Every drum was marked with an accumulation start date, with the oldest accumulation start date being 05/11/2023.

Wastewater Treatment Plant:

The facility treats wash water from the powder paint line. Treated water goes to Gainesville POTW. The WWTP is also equipped with portable fire extinguishers and spill control equipment. Hazardous waste filter cake generated from the filter press is added to a roll off container that is moved to a CAA for roll offs once full. Since the roll off container is over 55-gallons, the container cannot be treated as an SAA.

The inspectors observed one (1) roll off container with hazardous waste filter cake actively being added to it (Photo 20). The container was labeled “Hazardous Waste” with a Class 9 label and no start accumulation date. Facility representatives were educated on the container being a CAA container and not a SAA since it is over 55-gallons of hazardous waste. The inspectors also explained that the Class 9 DOT Placard indicates a miscellaneous hazardous material which does not indicate the hazard (flammable, corrosive, reactive, or toxic).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. §262.15(a)(6)(i)], a generator who accumulates either acute hazardous waste listed in § 261.31 or § 261.33(e) of this chapter or non-acute hazardous waste in excess of the amounts listed in 40 C.F.R. 262.15(a) of this section at or near any point of generation must do the following: (i)

Comply within three consecutive calendar days with the applicable central accumulation area regulations in § 262.16(b) or § 262.17(a).

The facility representatives added a start accumulation date of 05/18/2023 to the roll off container accumulating filter cake (Photo 21) and will be managing it as a 90-day CAA container from now on.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)(B)], an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704);

Facility representatives immediately placed a Toxic placard on the roll off container (Photo 21).

CAA for Roll Off Containers:

This CAA is located outside on the southwest side of the facility and near the WWTP. The facility manages filter cake waste in roll off containers from the WWTP in this area. The CAA is equipped with portable fire extinguishers and spill control equipment; and it is equipped with water to supply water hose streams. At the time of the inspection there were two (2) empty roll off containers that had recently been delivered.

Used Oil Storage Area 1:

Used oil is stored on the east side of the facility in a concrete containment pad. Universal Environmental Services takes the used oil for recycling. Aramark launders used oily rags. No hazardous waste was observed in this area. The inspectors did observe the following waste (Photos 22-24):

- 3000-gallon AST labeled “Used Oil”
- Two (2) 350-gallon ASTs labeled “Used Oil”
- One (1) 55-gallon drum of oil absorbents that was not labeled. The inspectors requested that the facility label the drum “Used Oil Absorbents” so that the contents of the drum are clearly known and displayed on the drum.

Used Oil Storage Area 2:

There is a second used oil storage area on the northeast side of the facility where the facility stores oily water in 250-gallon totes. The inspectors observed two (2) 250-gallon totes labeled “process water” (Photo 25). The inspectors recommended that the facility label the containers as “oily water” if oil and water are the only contents in the totes. No hazardous waste was observed in this area. On 05/23/2023, Laura McGaha sent an email to the inspectors with a photo of the containers re-labeled (Photo 26).

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated in June 2018. The plan describes 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. The plan describes arrangements agreed to with the local police department, fire department, local hospital, and the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators; however, it needs to be updated since one of the emergency coordinators no longer works at the facility.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.263(d)], the contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) The list of emergency coordinators changes.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

Documentation showing arrangements with local authorities was not available for review at the time of the inspection but was later submitted electronically on May 23, 2023. A copy of the June 2018 Contingency Plan (and its quick reference guide) was most recently submitted to the Hall County Emergency Management Agency, Gainesville Fire Department, Gainesville Police Department, and Northeast Georgia Medical Center on June 27, 2018.

The QRG 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; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s). The QRG also needs to be updated to show the most current emergency coordinators.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262(b)] requires an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262(b)].

Training Records:

The inspectors reviewed facility job descriptions and employee names for employees signing the hazardous waste manifests and employees handling hazardous waste. Each position description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Training records contained a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions. The inspectors reviewed records of employee hazardous waste training completed in 2020-2023.

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 May 2020. Hazardous waste manifest records show that D001 (paint-related waste and paint-booth filters) and F003 and F005 (solvent waste) is routinely shipped to Giant Resource Recovery Atalla, Inc. (ALD070513767) in Atalla, AL. D002 (sodium hydroxide waste and corrosive waste) is routinely shipped to Tradebe Treatment & Recycling of TN (TND000772186) in Millington, TN. F019 (filter cake waste) is routinely shipped to Chemical Waste Management (EPA ID ALD067138891) in Emelle, AL. The most recent shipment was made on 05/11/2023.

Weekly Inspection Records:

The inspectors reviewed the facility's available records of inspections of the hazardous waste CAAs since May 2020. The inspection log includes a checklist to record the number of containers, observations about leaking containers, and condition of containers. 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.

Waste Profiles:

Waste profiles were available for review and are kept in an electronic database. Once waste profiles expire, the waste stream will be re-analyzed.

Air Emission Records:

As part of their Title V permit, the facility conducts quarterly audits on their thermal oxidizer. The Thermal oxidizer is monitored on a daily basis. Monthly records were available for review for the thermal oxidizer. Quarterly audits and performance testing are conducted by Alliance Technical Group. The last quarterly audit was conducted on March 14, 2023. The paint booths are tested twice a year to ensure a 0.07 differential pressure is being maintained to divert emissions to the thermal oxidizer.

13) Closing Conference

The inspectors conducted the exit meeting with Don Leamon, Kaleb Saxion, and Laura McGaha. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

Facility representatives agreed to submit proof of arrangements with local authorities for the June 2018 QRG and contingency plan once located. In an email sent on May 23, 2023, Laura McGaha provided signature verifications for Hall County Emergency Management, Gainesville Fire Department, Gainesville Police Department, and Northeast Georgia Medical Center who received the QRG and contingency plan on June 27, 2018.

The email also contained photos (Photos 27-30) of the drum missing a label for used oil absorbents, the red containers of used oily rags with new labeling to specify the containers are just for used oil rags, a photo for the red container in the Paint Room labeled “New Rags Only”, and a photo of the cubic yard box of universal waste aerosol cans with the lid properly secured on it.

Facility representatives agreed to update the QRG and contingency plan with the current emergency coordinators and notify the inspectors once the updated QRG and contingency plan has been submitted to the local authorities.

14) List of Appendices

Appendix 1 – Photo Log:

15) Signed

KAYLA ACOSTA

Digitally signed by KAYLA
ACOSTA
Date: 2023.07.10 09:37:12 -04'00'

Kayla Acosta
Physical Scientist

16) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ
Date: 2023.07.11 10:26:02 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Appendix 1 – Photo Log

[#30] Photos taken on: May 18, 2023

Photos taken by: Kayla Acosta

Photos taken with: Canon PowerShot Elph 180

EPA Property Tag: S/N 902063018726



Photo 1: One (1) cubic yard cardboard box labeled Electronic Waste, closed, and dated.



Photo 2: One (1) cubic yard cardboard box labeled Universal Waste - Lamps, closed, and dated.



Photo 3: One (1) 2-gallon container labeled Universal Waste Batteries and one (1) 2-gallon container labeled Universal Waste Mercury-containing Equipment. Both containers were dated and closed.



Photo 4: Universal Waste Storage Area 1.



Photo 5: 5-gallon red container labeled “Oily Waste Can”.

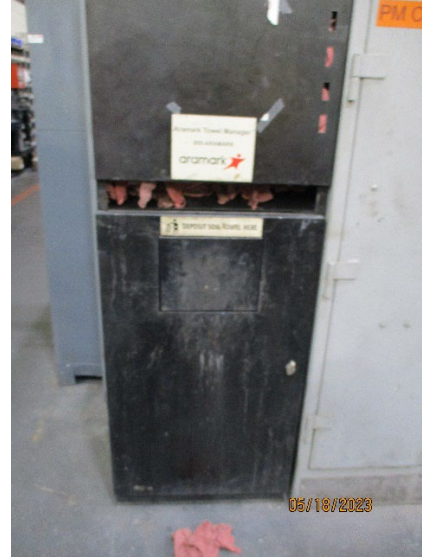


Photo 6: Aramark Towel Manager Station for soiled rags (just containing dirt).



Photo 7: Universal Waste Storage Area 2 for used aerosol cans. Container was labeled “universal waste”, with a start accumulation date, but slightly open.



Photo 8: 250-gallon double-walled AST labeled “Used Oil”.



Photo 9: 55-gallon drum of paint sludge/ still bottom actively collecting paint sludge. Container is labeled “Hazardous Waste” with an indication of hazard.



Photo 10: One (1) 55-gallon drum of paint debris solids (filters), the drum was closed, labeled “Hazardous Waste” and with an indication of hazard.



Photo 11: One (1) 55-gallon drum of paint debris solids (filters), drum is slightly open, labeled “Hazardous Waste”, and with an indication of hazard.



Photo 12: One (1) 5-gallon container of solvent rags, container was closed, no label, no accumulation start date.



Photo 13: Clean Planet Chemical Xylene Recycler.



Photo 14: Two (2) 55-gallon drums of paint line flushing (from two different paint lines), properly closed, labeled “Hazardous Waste”, and marked with an indication of hazard.



Photo 15: One (1) 55-gallon drum of waste sludge (still bottom), labeled “Hazardous Waste”, marked with an indication of hazard, and not securely closed with a drum ring.

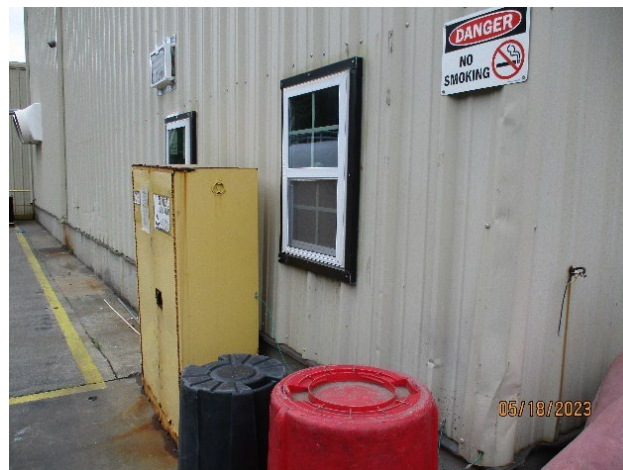


Photo 16: CAA entrance for drum waste.



Photo 17: Spill kitt in CAA for drum waste.



Photo 18: (18) 55-gallon drums of hazardous waste in the CAA for drum waste.



Photo 19: Hazardous waste drums in CAA for drum waste.



Photo 20: Filter cake being added to hazardous waste roll off container in WWTP.



Photo 21: New toxic placard added to roll off container of filter cake since Class 9 placard does not indicate the hazard content.



Photo 22: Used Oil Storage Area 1



Photo 23: 350-gallon AST labeled "Used Oil" in Used Oil Storage Area 1.



Photo 24: Container of oil absorbents in Used Oil Storage Area 2. Inspectors requested a label for the container.



Photo 25: Used Oil Storage Area 2 for oily water. Inspectors recommended re-labeling the containers to “Oily Water” instead of process water.



Photo 26: Containers of oily water with new labels.



Photo 27: Label placed on absorbents with used oil.



Photo 28: New label specifying designated containers are for oily rags only.



Photo 29: New label for red container in Paint Room (in between paint booths) for new rags only.



Photo 30: Universal waste aerosol cans with lid properly secured onto cubic yard box.