

RCRA Inspection Report

1) Inspector(s) and Co-author(s) of Report

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2) Facility Information

Milliken & Company Magnolia Finish Plant
157 New Milliken RD. and 164 New Milliken RD.
Blacksburg, South Carolina 29702
EPA ID# SCD047559570

3) Responsible Officials

Lee Slusher, Director of Corporate Environmental
Marshall Mills, EHS Specialist Magnolia Plant
Rob Wallace, Environmental Manager Allen Plant

4) Inspection Participants

Lee H. Slusher, Milliken & Company
Debra Bassnight, Milliken & Company
Marshall Mills, Milliken & Company
Rob Wallace, Milliken & Company
Laurie Benton DiGaetano, U.S. EPA
Kayla Acosta, U.S. EPA
Christopher M. Cusack, SCDHEC
Alaina K. Holst, SCDHEC

5) Date of Inspection

March 30, 2021

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; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

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. 61-79.262.17 [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. 61-79.273.9 [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.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Milliken & Company’s compliance with the applicable requirements of RCRA and the corresponding SC DHEC regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

SCDHEC has conducted one RCRA CEI at the subject facility between 2014 and 2021 and found no violations during those inspections.

On August 13, 2014, SCDHEC conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA’s requirements.

9) **Facility Description**

Milliken & Company Magnolia Finishing Plant (Milliken Magnolia), a subsidiary of Milliken & Company, is a campus divided into two manufacturing plants, the Magnolia Plant and the Allen Plant. Both the Magnolia Plant and the Allen plant are RCRA regulated facilities under the same EPA ID SCD047559570. The Magnolia Plant is a textile dyeing and finishing plant which receives rolls of poly cotton mix that go through a process of preparation, dyeing, and finishing. The Allen Plant is a chemical manufacturing plant that specializes in making chemical additives.

The Allen Plant is in the process of separating itself from the Magnolia Plant and registering as a Large Quantity Generator (LQG) with its own EPA ID number. The Magnolia Plant has approximately 350 employees and operates twenty-four (24) hours a day, seven (7) days a week, with three (3) shifts. The Magnolia Plant encompasses 75 acres. The Allen Plant has approximately 195 employees and 223 full-time contractors, operates twenty-four (24) hours a day, seven (7) days a week, with four (4) shifts. The Allen Plant encompasses 20 Acres. Milliken Magnolia has a guard gate which allows for controlled access to the Magnolia and Allen plants, with fencing surrounding the property.

Milliken Magnolia first notified as a small quantity generator (SQG) of hazardous waste at this location in 1995. Between June 2013 and January 2014, and again for approximately one month in January 2017, Milliken Magnolia notified as a large quantity generator. At all other times between 1995 and 2017, Milliken had notified as an SQG. On March 1, 2017, Milliken Magnolia re-notified as an LQG of hazardous waste and has been operating as an LQG at this location since then.

Milliken Magnolia most recently notified as an LQG of hazardous waste as part of the biennial report on January 1, 2019. Hazardous wastes identified in the report include: D001 / F005 / F003 paint / paint related material, D002 / D007 / D009 / D011 spent COD vials, D001 / F003 waste flammable solvent, D001 / F003 / F005 spent non-halogenated solvent absorbent, D001 / F003 flammable liquid non-halogenated, D001 / D002 / F003 flammable liquid toxic corrosive, D001 flammable liquid toxic, D001 / D003 / D008 flammable solid toxic organic, D001 allyl chloride, D001 / D002 / U404 triethylamine, D001 / D002 waste corrosive liquid acidic inorganic, D002 waste corrosive liquids oxidizing, D001 / U154 waste flammable liquids, D001 waste allyl bromide, D001 waste surfactant, D001 / D002 NSA spill cleanup, D001 waste isopropanol, D002 waste hydrochloric acid, D001 waste bromobenzene, and D001 / F003 waste solids containing flammable liquids. Milliken Magnolia operates under the NAICS Code 313310 for Textile and Fabric Finishing Mills and under 325199 for All Other Basic Organic Chemical Manufacturing.

The Magnolia Plant is part of the company's Textile Division. The plant specializes in manufacturing finished textile goods through textile preparation, dyeing and curing. Fabrics are made of natural and synthetic fibers and received in rolls prior to the preparation process for dyeing. The rolls of poly cotton mix textiles are received at the plant by common carrier via box truck, tractor trailer, tanker truck and rail car. Fabrics are dyed by being sent through a thermo fixation process, which allows colorants to be chemically reacted or reduced, then dried. Finishing equipment finishes fabrics with a nip pad and vacuum application, tender dry, and

oven cure process. The facility utilizes various face-finishing techniques to modify the surface of the fabric to meet client specifications. Soaps and left-over dye are sent to the wastewater treatment plant (WWTP) on Milliken Magnolia property. The WWTP is shared by both the Magnolia Plant and the Allen Plant and is run by a third-party utilities group. The WWTP generates a sludge which is sent to a cement kiln and used as a filling material. The bulk of waste generated at the facility is wastewater which goes to the WWTP and is comprised of leftover dyes, finishing chemicals, cleaning chemicals, and soaps.

Site utilities are owned and operated by Milliken and Company's Blacksburg Utility Co-op which is co-located with Milliken Magnolia and includes production of plant process water and steam, as well as treatment of all plant wastewater and serves the Magnolia Plant and Allen Plant, a Chemical Division plant also located on the greater Milliken property.

The Allen Plant is part of the company's Chemical Division and manufactures additives and colorants for plastics. Chemicals are stored indoors and in outdoor bulk tank farms in the central portion of the site. Industrial activities include chemical manufacturing for plastic additives and colorants and chemical unloading / loading and storage. Ancillary activities include covered hazardous waste storage area and contractor's equipment and staging. The following are manufactured products: Creative Colorants - washable and food-grade consumer products, DispersiTech™ - thermoset plastic, Liquitint® - non-staining water soluble, Reactint® - colorants for polyurethane, Millad® – clarifier for polypropylene plastic.

10) **Opening Conference**

On March 30, 2021, EPA inspectors Laurie Benton DiGaetano and Kayla Acosta, accompanied by SCDHEC inspector Christopher Cusack, arrived at the Milliken & Company Magnolia Finishing Plant at approximately 9:45 a.m. Inspectors completed a COVID-19 questionnaire and were screened for temperature. Mr. Marshall Mills, Environmental, Health and Safety Environmental Specialist, immediately received the inspectors. Mr. Mills and the inspectors were joined by Mr. Lee Slusher and Ms. Debra Bassnight for the opening conference. The inspectors introduced themselves, showed their credentials to Mr. Mills, Mr. Slusher and Ms. Bassnight, and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection, and discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim. Electronics were not allowed throughout the Allen Plant facility walk through for safety; therefore, Mr. Wallace who is the Environmental Manager for the Allen Plant, took photos using a protective cover on a cellular phone and provided the photos to the inspectors via email.

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

SCDHEC inspector, Alaina Holst, joined the inspection participants during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Mills, Mr. Slusher and Ms. Bassnight led the inspectors on a tour of the Facility operations.

11) **Findings**

Magnolia Plant

Prep Area: Rolls of Poly cotton mixed textiles are received and brought into the facility to be prepped for dyeing. There are three prep lanes designated for the fabrics to be washed in soaps with hydroxide to remove size and caustic solution to swell fabric to prepare for the dyeing process. Spent caustic soda is collected and reused. Lint waste, which is non-hazardous, is collected and sent out for incineration. No hazardous waste was observed in this area.

Dye Department: There are a total of five dye lanes for coloring the fabric. The dye has been determined to be non-hazardous. This area is equipped with floor drains. Any spilled dye is collected in the drains and goes to the WWTP. The color control center is where dyes are pumped out of totes and mixed in tanks. Mixed dye is then pumped into control units at the dye lanes. Next to the color control center is the Dye Lab where the dyes are all tested for bacteria growth and viscosity. No hazardous waste was observed in these areas.

Snake Pit: This area is where empty totes are washed and triple rinsed. The wash water goes into the snake pit drains which lead to the WWTP. No hazardous waste was observed in this area.

Finish Lanes: There are three lanes where finishing chemicals are added onto the fabrics such as flame retardant and water repellent. The finished textiles undergo a quality assurance before being prepared for shipment. No hazardous waste was observed in this area.

Supply Room: Universal waste (UW) batteries are stored here (Photos 1-4). The following UW was observed:

- Four (4) 5-gallon containers labeled “Universal Waste Used Batteries” closed and all dated 9/11/20

Pen 1 - Just inside Plant 2 Chemical Dock: This area is not a designated Hazardous Waste Central Accumulation Area (CAA); however, Mr. Mills explained that due to the designated CAA being full this area was being used as a hazardous waste storage area. (Photos 5-11). This area was equipped with a fire pull station, fire extinguisher, and spill response equipment. This area did not contain proper secondary containment, or any signage to indicate it is a CAA. The floor also appeared to be cracked. The following hazardous wastes were observed:

- Ten (10) 55-gallon drums labeled “Hazardous Waste Paint - Waste Blasting Media - D008”, closed and all drums dated 3/26/21
- One (1) 250-gallon plastic tote labeled “Hazardous Waste – Blasting Media and Paint Waste – D008”, closed and dated 3/26/21

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. 61-79.262.251 [40 CFR § 262.251], and is a condition

of the LQG Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Designated CAA in Dock Area: The CAA is located in a covered area and on a concrete pad. It is divided into nonhazardous and hazardous waste storage (Photos 12-18). The CAA is equipped with a spill kit. Hazardous waste containers are stored on top of portable secondary containment units. The following containers were observed in front of the CAA:

- One (1) 55-gallon drum labeled “Universal Waste Non-PCB Ballasts” closed and dated 1/28/21
- One (1) 55-gallon drum labeled “Universal Waste Lamps” closed and dated 6/21/20
- One (1) 55-gallon drum labeled “Universal Waste Lead Acid Batteries” closed and dated 9/22/20
- One designated hazardous waste satellite accumulation area (SAA) with one (1) 55-gallon drum labeled “Hazardous Waste Broken Bulbs – Mercury” closed and elevated with a locked latched lid.

In the CAA, the following hazardous wastes were observed:

- Six (6) 55-gallon drums labeled “Hazardous Waste Toxic FR Mix - D004, D007”, closed, all contained DOT toxic hazard placard, and all dated 3/1/21
- One (1) 55-gallon drum labeled “Hazardous Waste Aerosol – D001” closed, contained DOT flammable hazard placard, and dated 2/11/21

Crystal-Clear Parts Washer with 35-gallon drum is recycled by Crystal-Clear.

The CAA is identified with signage that reads “Caution Hazardous Waste Storage Area”. Operators carry radios and the facility has a plant-wide alarm system. The emergency coordinator is summoned by radio.

Storage Area for Fluorescent Bulbs: Storage shed was labeled used “fluorescent bulbs”. Six (6) boxes of fluorescent bulbs were observed inside the storage shed. All boxes were labeled Universal Waste lamps (Photo 19). The inspectors observed four (4) 8-ft boxes and two (2) 4-ft boxes. All boxes were closed. The oldest accumulation start date was 10/20/20.

Just outside of the storage area for fluorescent bulbs was one (1) 55-gallon drum labeled “Universal Waste Lamps”, which was closed and dated 9/30/20 (Photo 20).

SAA: Next to the maintenance building is a SAA for managing waste paint.

- One (1) 55-gallon drum with a locked, latched funnel lid, and on secondary containment. Labeled “D001 Hazardous Waste Used Paint” with flammable liquid DOT hazard placard (Photos 21 and 22).

Oil Room: This enclosed room stores lubricants and oils. The following wastes were observed:

- One (1) 55-gallon drum of used oil rags and absorbent, closed and properly labeled
- Three (3) 55-gallon drums of used oil with locked funnel lid. Small bung open on one used oil drum (Photo 23).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.279.22(b)(3), containers and aboveground tanks used to store used oil at generator facilities must be closed to prevent spillage or contamination from precipitation.

Disposal Records:

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

D002 / D007 / D009 / D011 waste corrosive liquid, acidic, inorganic (sulfuric acid, chromium, mercury, silver) to Heritage Environmental Services IND093219012 shipped on 10/08/2018 and 06/11/2018

D002 / D007 / D009 / D011 waste corrosive liquid, acidic, inorganic, sulfuric acid to Heritage Environmental Services IND093219012 shipped on 11/28/2019

Contingency Plan – Magnolia Plant: The actions that facility personnel should take in response to an emergency are described in the facility’s Hazardous Waste Contingency Plan, which was last updated on 04/13/2020. The Quick Reference Guide (QRG) included emergency coordinator contacts, a site map, and facility map with spill kits, oil storage, and muster points. Hazardous waste lists were included. Equipment list and capabilities include: Personal protective equipment (PPE), fire response, spill response, communication. SAAs and where the wastes are generated are included on the map. Emergency responders are listed as the Blacksburg Volunteer Fire Department, Buffalo Fire Department, and Blacksburg Police Department. Proof that copies of the contingency plan were sent to local emergency responders were not available for review.

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 must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

The contingency plan did not list water resources for water supply. For example, regarding fire hydrants for emergencies.

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)(6) [40 C.F.R. § 262.262(b)(6)], and is a condition of the LQG Permit Exemption, a large quantity generator that is otherwise amending its contingency plan must submit a quick reference guide (QRG) of the contingency plan to the local emergency responders . The QRG must include the locations of the water supply (e.g. fire hydrant and its flow rate).

The facility map in the contingency plan did not identify the CAA in Pen 1.

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. 61-79.262.263(c) [40 C.F.R. § 262.263(c)], and is a

condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended whenever the facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.

Employee training / Annual training: Training records and certifications observed for Marshall Mills, Stacie Neal, Jennifer Wilson. Marshall Mills completed Lion Technology RCRA Hazardous Waste Management Online Course on 03/19/2020 and J.J. Keller RCRA Hazardous Waste Generator Training on 03/04/2021.

Weekly Inspections: Weekly inspections were reviewed for 2020 and 2021. The time that inspections were conducted was not recorded for the following inspection dates: 8/21/20, 9/11/20, 9/18/20, 10/9/20, 10/16/20, 10/23/20, 10/30/20, 11/13/20 and 3/29/21.

Allen Plant

Mr. Rob Wallace, Environmental Manager of the Allen Plant advised us that cameras and jewelry must be removed before the facility walk-through of the Allen Plant. Mr. Wallace took inspection photos for the inspectors using an iPhone with a special protective case. Photos of the inspection were emailed to the inspectors on April 27, 2021.

Warehouse 1: The facility has four light manufacturing units. ClearTint™ is a product that is manufactured as a compound colorant with polyethylene / polypropylene to create a plastic pellet. Pellets that come out as the wrong size or shape get recycled.

An aerosol can puncture device was observed with a 55-gallon drum labeled Hazardous Waste - Paint with a flammable liquid DOT hazard placard (Photo 24). Emergency shower / eyewash and fire extinguisher were observed nearby.

DTech (DispersiTech™): Poly resin is put into a vat. A dust collector is turned on to pour pigment into its final product, dispersed pigment in resin looks like paint. It takes two weeks to fill a drum from the dust collector. Dust from dust collector is treated as hazardous waste. The filters are changed out as directed by manufacturer about one or two times per year. The filter bag dust is collected in 55-gallon container every 2 weeks labeled as non-hazardous waste.

Secondary CAA/UW Storage Area: The secondary Central Accumulation Area (CAA) is located inside the warehouse and identified with signage. It is equipped with a fire extinguisher and a spill kit at the end of the row of shelves. Employees carry radios on them and have cell phones for communication. There is portable secondary containment for hazardous waste storage. At the time of the inspection, there was no hazardous waste being stored in the secondary CAA. The following universal wastes were observed (Photo 25):

- One (1) 5-gallon container of spent lithium batteries labeled “Universal Waste Batteries”, closed and dated 3/1/21
- Two (2) cardboard cylinders of 4-foot bulbs labeled “Universal Waste Lamps”, closed and dated 03/01/21

- One (1) cardboard cylinder of 4-foot bulbs labeled “Universal Waste Lamps” open, and dated 3/1/21
- One (1) gaylord box for E-waste which was properly labeled and dated 2/12/21
- One (1) 8ft cardboard box determined by Milliken staff to be spent bulbs with no label or accumulation start date.

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 or label 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).”

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.15(c)(1) [40 C.F.R. § 273.15(c)], a SQHUW who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Maintenance Department: One (1) 55-gallon drum of used oil was observed closed and properly labeled “Used Oil” on top of a secondary containment pallet. One (1x) 55-gallon drum labeled “Non-regulated MFG Waste” with a waste profile #9308 was observed to be closed. No hazardous waste was observed in this area.

Tank Farm: The tank farm consists of above ground storage tanks which store Ethylene Glycol for production. No hazardous wastes were observed.

AF Building: This building is part of the Millad® process. The following hazardous waste was observed in the SAA:

- One (1) 55-gallon drum for filter bags from the recirculation line, labeled “Hazardous Waste Flammable Liquid D001”, closed and on secondary containment (Photo 26).

AK Building: Modified sugar goes through purification steps with allyl halides and then sent to Millad® to make the flagship polypropylene product. Distillation bottoms filter into SAAs. Light fluoride gets distilled and reused in process. The facility generates about two (2) drums of distillation bottoms allyl chloride and allyl bromide (D001 / D002) per shift, which is four drums per day. The following hazardous wastes were observed in the SAAs:

- Four (4) 55-gallon drums labeled “Hazardous Waste - Flammable Liquid, Corrosive and Toxic” with DOT hazard placards, closed and dated 03/30/2021. The bungs on the drums were loose because the material is hot when it is accumulated inside the drums.
- One (1) 55-gallon drum of TAK-16 filter bag waste, labeled “Hazardous Waste - Flammable, Corrosive and Toxic” with DOT hazard placards.

There are two reactors which run one at a time. An eyewash and shower station are nearby with a fire alarm and breathing apparatus.

Primary CAA: Located on the south side of Allen Plant. The primary CAA receives four (4) 55-gallon drums per day and about 50 drums per week. The CAA is on a curbed concrete pad and covered with a dome roof. Raw materials are also stored here along the sides separate from the hazardous waste drums. Signage included “Hazardous Waste Storage Area” and “No Smoking, Matches, or Open Flames”. The CAA also has a spill kit and fire extinguishers. All personnel

carry radios. The inspectors observed were four rows of hazardous waste containers double stacked. Approximately (198) 55-gallon hazardous waste drums with flammable liquid, toxic and corrosive DOT hazard placards and the majority labeled “Hazardous Waste” with an accumulation start date (Photo 27). The earliest start accumulation date was 3/6/21. Approximately seven (7) 55-gallon drums were missing a Hazardous Waste label. Milliken personnel immediately added Hazardous Waste labels to those drums during the inspection.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(A) [40 C.F.R. § 262.17(a)(5)(i)(A)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label its containers with the words “Hazardous Waste”.

Brian Myers, Millad® Production Manager joined for the tour of the Millad® Production Area. Produces clarifiers for polypropylene. Modified sugar aldehyde is another input. There is a wet side and dry side of production where the wet side charges sugar with cyclohexane. Product is a powder in bags. It takes 18-20 hours to complete the reaction. Then it is neutralized and cleaned up for sale. Processes include: Methanol strip, Product wash, Cyclohexane strip, Powder and water left, Temperature and Vacuum to get rid of aldehyde. There is a SAA with one 55-gallon drum for cyclo-methanol D001 like the one for filter bags.

Quality Lab: Quality samples from distillation are examined to make sure it does not have too much water in the reclaimed solvent. If there is too much water, it goes through the distillation process again. Samples are sent out as hazardous waste. The following hazardous wastes were observed in designated SAAs:

- One (1) 55-gallon closed drum of methanol labeled “Hazardous Waste Flammable”
- One (1) 55-gallon closed drum of acetone/methanol labeled “Hazardous Waste Flammable”
- One (1) 7-gallon closed container of heavy metal waste near atomic absorption labeled “Hazardous Waste – Flammable Liquid”
- One (1) 5-gallon closed container of ICP waste labeled “Hazardous Waste – Corrosive”
- One (1) 5-gallon closed container under lab hood for allyl chloride labeled “Hazardous Waste – Toxic, Flammable, Corrosive”

Industrial Wastewater Treatment System: Inside of the Industrial Waste Pretreatment System building, a designated satellite accumulation area was observed containing one 5-gallon, closed and labeled “Hazardous Waste – Corrosive” container for chemical oxygen demand samples used for testing wastewater treatment samples.

Disposal Records: Hazardous waste manifests and disposal records for universal waste and non-hazardous waste were available for review. Manifests included final signed copy from designated facility. No errors were observed for manifests.

Cycle Chem (PAD067098822) picks up hazardous waste about once a month. Wastes included: D001 / F003 Waste flammable liquid (methanol, cyclohexane), D001 / D002 / F003 waste flammable liquid oxic corrosive (acetone, allyl halides), D001 / D002 / F003 waste flammable liquid toxic corrosive (Allyl chloride, allyl bromide), and D002 waste solids w/corrosive liquid (sodium hypochlorite).

Manifest 022193507 JJK shipped on 8/20/20 for D001, D002, F003 Allyl Chloride and Allyl bromide contained signed final copy from the designated facility.

Non-hazardous waste sent to VLS Recovery Services for Waste Profile #9308. Inspectors reviewed manifests for 2021. Universal waste sent to CleanLites Recycling South. Inspectors reviewed records of shipments sent during 2020 and 2021.

Contingency Plan: The facility is equipped with internal emergency notification / communication. Evacuation procedures are described in contingency plan dated 12/21/2020. Emergency equipment listed in the contingency plan include: Fire hose, fire extinguishers, foam, sprinklers, and personal protective equipment (PPE). The contingency plan also includes actions to take in response to a hazardous waste discharge, fire / explosion, and spills. The Quick Reference Guide (QRG) includes the names of emergency coordinators and phone numbers, emergency contacts, a site map, and facility map that shows hazardous waste accumulation areas. The QRG also contains a list of hazardous waste generation, profile name, process generating, waste constituents, waste codes, general location, storage location, special health / handling, and typical amount. Proof of emergency response arrangements with the local authorities was provided. The contingency plan was sent to the following list of emergency responders on either 12/22/2020 or 12/24/2020: Blacksburg PD, Blacksburg volunteer FD, Buffalo Volunteer FD, Cherokee Co LEPC, Cherokee Medical Center, Spartanburg Regional Medical Center.

Employee Training: 2020 Waste Handling Training was available for review and included employee names with checkmark next to the name and training exam in the file. Level of training requirements is based on employee job titles. Reviewed Environmental Engineer / Chemist job description, which included required education and hazardous waste duties. Inspectors reviewed training certification for Rob Wallace.

Weekly Container Inspections: Weekly container inspections were reviewed. The facility inspects for open containers, leaking containers, damaged or rusting containers, unlabeled containers, containers, incompatibility, aisle space, ignitable wastes 50 ft from property line, and spill equipment. It also details the name of the auditor, date, and time inspection was conducted. Dates reviewed included 03/01/2019 through 2021. No issues were noted.

12) Closing Conference

An exit meeting was held at the end of each inspection with the Magnolia Plant staff and the Allen Plant staff respectively to discuss preliminary conclusions and to go over any pending items such as records that were not available during the actual inspection. Both the Magnolia Plant staff, and the Allen Plant staff agreed to provide missing records in an email to the inspectors.

13) Inspection Findings

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

Magnolia Plant

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. 61-79.262.251 [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Pursuant to 25 S.C. Code Ann. Regs. 61-79. 279.22(b)(3), containers and aboveground tanks used to store used oil at generator facilities must be closed to prevent spillage or contamination from precipitation.

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 must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services). 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)(6) [40 C.F.R. § 262.262(b)(6)], and is a condition of the LQG Permit Exemption, a large quantity generator that is otherwise amending its contingency plan must submit a QRG of the contingency plan to the local emergency responders. The QRG must include the locations of the water supply (e.g. fire hydrant and its flow rate).

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. 61.79.262.54(c) [40 C.F.R. § 262. 263(c)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended, if necessary, whenever the facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.

Allen Plant

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 or label each lamp or a 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).”

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.15(c)(1) [40 C.F.R. § 273.15(c)], a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(A) [40 C.F.R. § 262.17(a)(5)(i)(A)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label its containers with the words “Hazardous Waste”.

14) **List of Appendices**

Appendix 1 – Photo Log:

{27} Photos taken on: [03/30/2021]

Photos taken by: Kayla Acosta and Rob Wallace (for the Allen Plant)

EPA Photos taken with: Olympus Tough Digital Camera

EPA Property Tag: S75903

15) **Signed**

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

Date

Kayla Acosta
Enforcement and Compliance Specialist

Date

Concurrence

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

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RCRA CEI Photographs



Photo 1: Universal waste – used batteries. Inside Supply Room of Magnolia Plant.

Milliken Magnolia
RCRA CEI Photographs

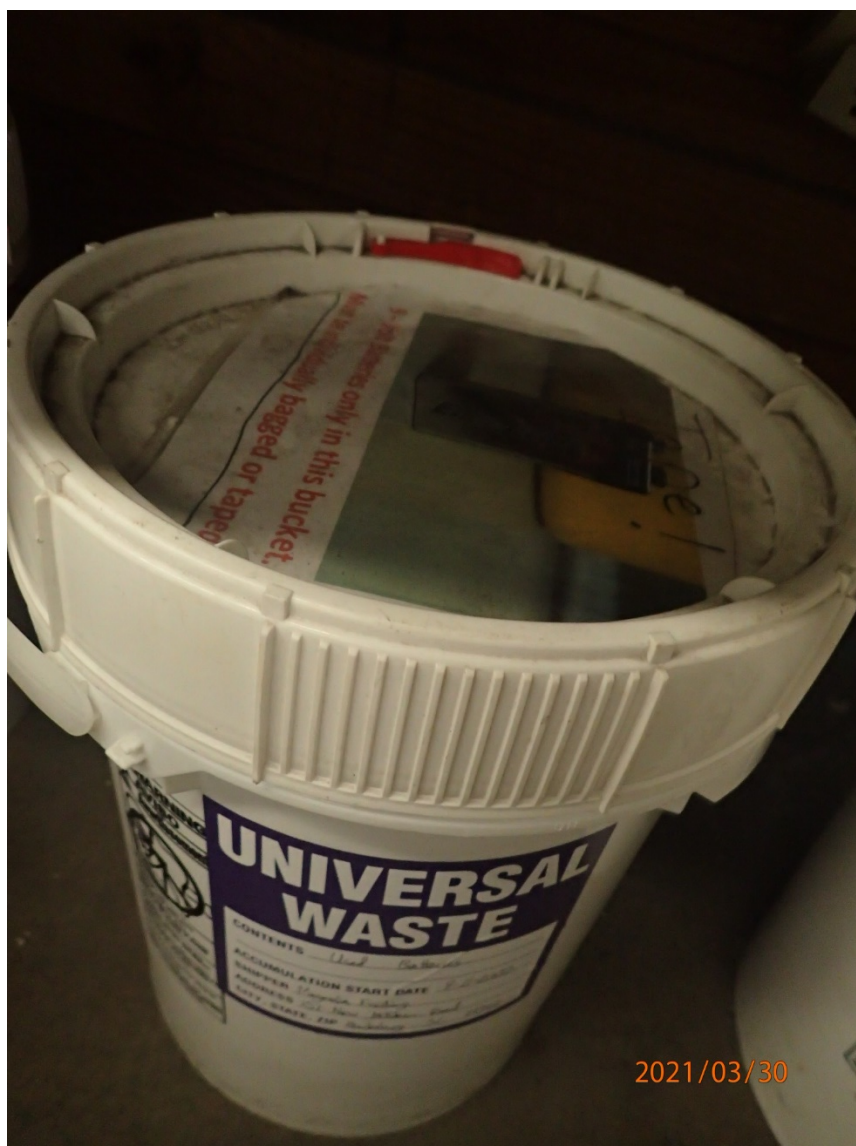


Photo 2: Universal waste batteries. Inside Supply Room of Magnolia Plant.

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RCRA CEI Photographs



Photo 3: Universal waste used batteries, inside Supply Room of Magnolia Plant.

Milliken Magnolia
RCRA CEI Photographs



Photo 4: Universal waste batteries inside Supply Room of Magnolia Plant.

Milliken Magnolia
RCRA CEI Photographs



Photo 5: Pen 1 in Magnolia Plant. 55-gallon drums of Hazardous Waste Paint - Waste Blasting Media - D008.

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RCRA CEI Photographs

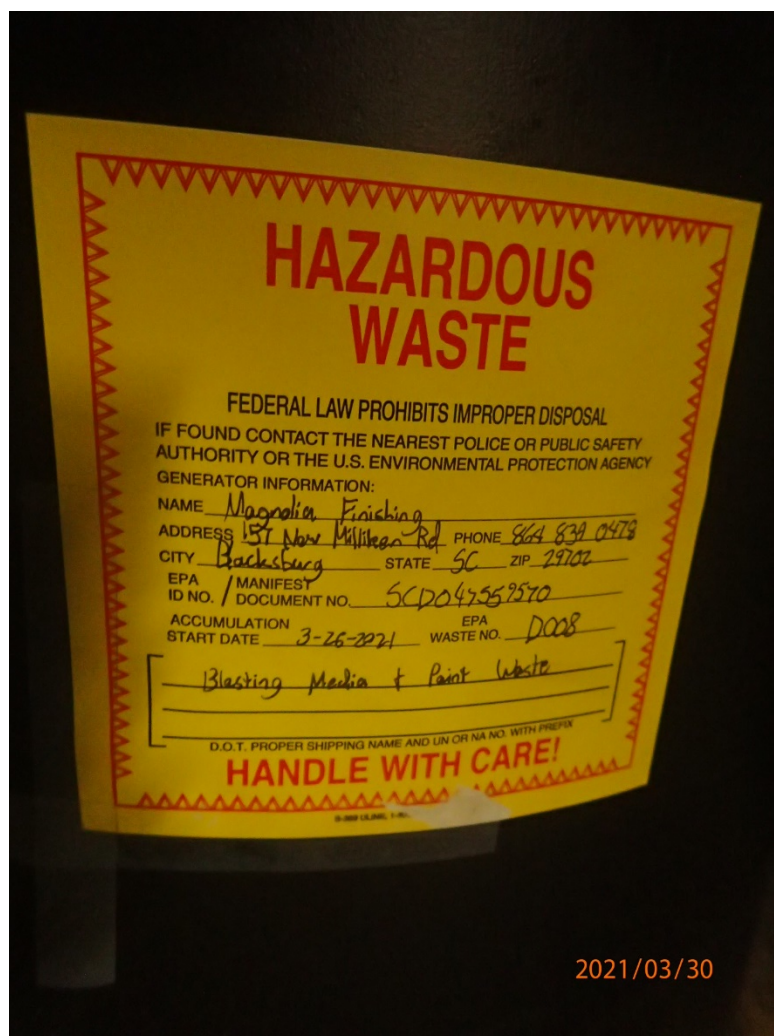


Photo 6: 55-gallon drum with label for blasting media and paint waste. Located inside Pen 1 in Magnolia Plant.

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Photo 7: 55-gallon drum with label for blasting media and paint waste. Located inside Pen 1 in Magnolia Plant.

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Photo 8: Pen 1 in Magnolia Plant. 55-gallon drums of Hazardous Waste Paint - Waste Blasting Media - D008.

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HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME Magnolia Finishing

ADDRESS 157 New Milliken Rd PHONE 864-889-0078

CITY Blacksburg STATE SC ZIP 29002

EPA / MANIFEST
ID NO. / DOCUMENT NO. SCD047559570

ACCUMULATION
START DATE 3-16-2021 EPA WASTE NO. D228

[Blasting media & paint waste]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PROPER

HANDLE WITH CARE!

2021/03/30

Photo 9: Hazardous waste label on one of the 55-gallon drums of blasting media/ paint waste located in Pen 1, Magnolia Plant.

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Photo 10: 55-gallon drums of “Hazardous Waste Paint - Waste Blasting Media - D008”, located in Pen 1, of Magnolia Plant.

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Photo 11: 250-gallon tote labeled “Hazardous Waste – Blasting Media and Paint Waste – D008”. Located at Pen 1 inside Magnolia Plant.

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Photo 13: Universal Wastes in front of CAA. In front of Designated CAA in Dock Area. Magnolia Plant.

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Photo 14: 55-gal drum of Hazardous Waste Broken Bulbs – Mercury D009. In front of designated CAA in Dock Area. Magnolia Plant.

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Photo 15: 55-Gal drums of Hazardous Waste Toxic FR Mix - D004, D007. Designated CAA in Dock Area. Magnolia Plant.

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RCRA CEI Photographs

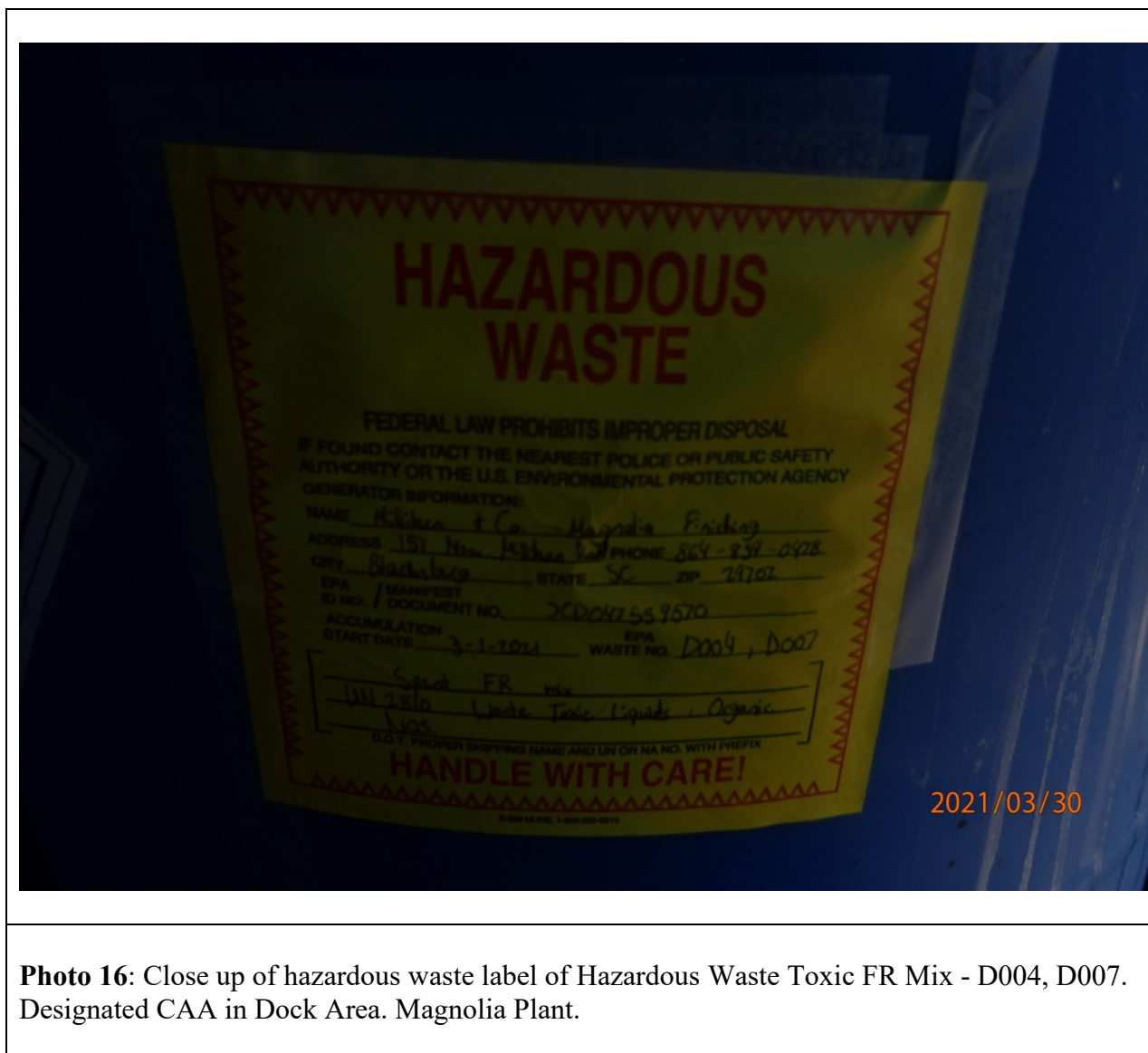


Photo 16: Close up of hazardous waste label of Hazardous Waste Toxic FR Mix - D004, D007. Designated CAA in Dock Area. Magnolia Plant.

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Photo 17: 55-Gal drums of Hazardous Waste Toxic FR Mix - D004, D007. Designated CAA in Dock Area. Magnolia Plant.

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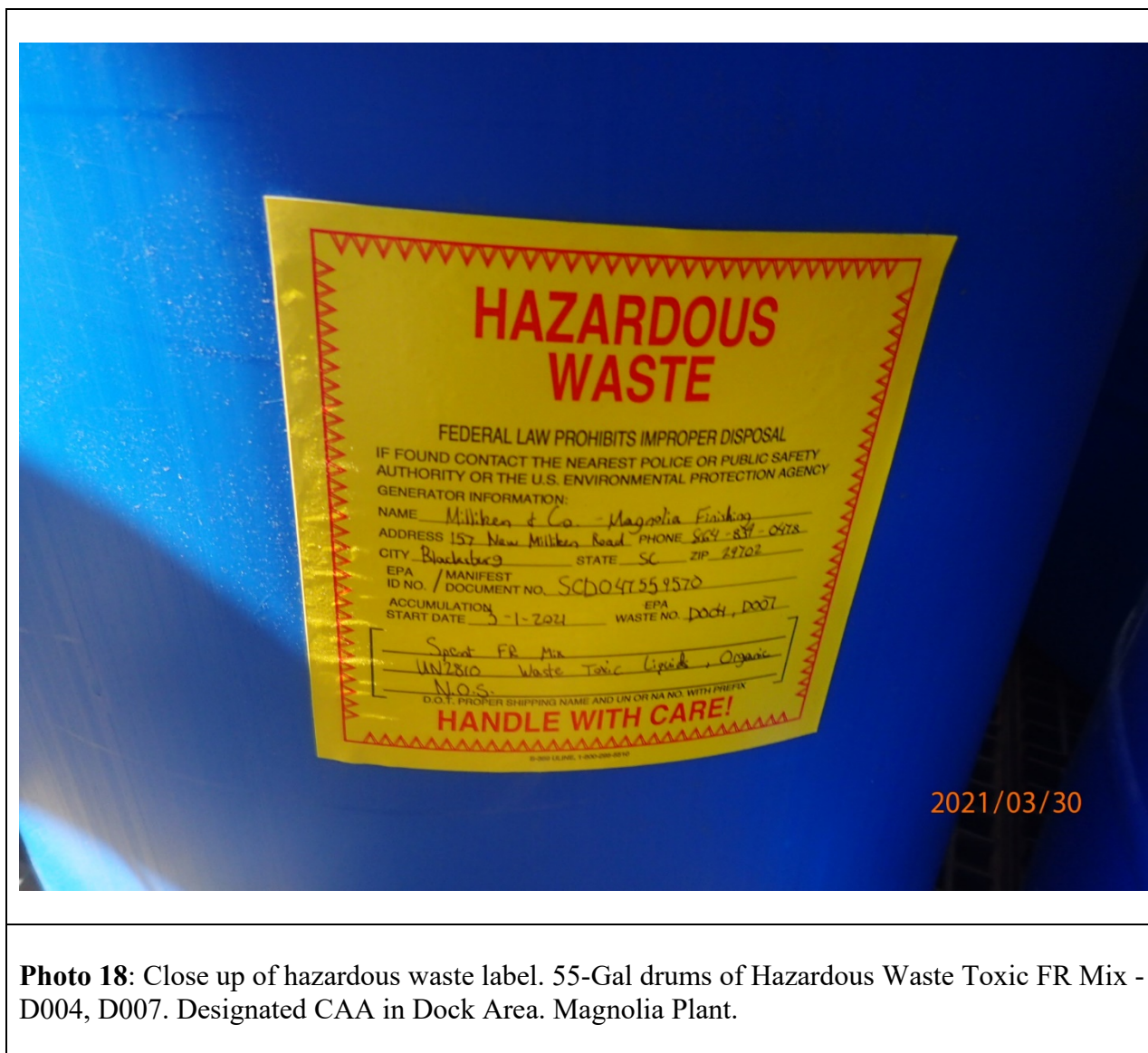


Photo 18: Close up of hazardous waste label. 55-Gal drums of Hazardous Waste Toxic FR Mix - D004, D007. Designated CAA in Dock Area. Magnolia Plant.

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Photo 19: Storage area for Universal Waste Spent Fluorescent Bulbs. Four 8-ft boxes and two 4-ft boxes. Magnolia Plant.

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Photo 20: Universal waste lamps in 55-gal drum next to Universal Waste Spent Fluorescent Bulbs storage shed. Magnolia Plant.

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Photo 21: SAA – 55-gal drum labeled D001 Hazardous Waste Used Paint. Magnolia Plant.

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Photo 22: Close up of hazardous waste label of 55-gal drum labeled D001 Hazardous Waste Used Paint. Magnolia Plant.

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Photo 23: Three 55-gallon drums of used oil with locked funnel lid. Small bung open on one used oil drum (middle). Inside Oil Room in Magnolia Plant.

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Photo 24: Photo taken by Rob Wallace, Environmental Manager at Allen Plant. 55-gal drum of Hazardous Waste – Paint with aerosol can puncture device.

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Photo 25: Photo taken by Rob Wallace, Environmental Manager at Allen Plant. Secondary CAA/ Universal Waste storage area.

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Photo 26: Photo taken by Rob Wallace, Environmental Manager at Allen Plant. AF Building. 55-gallon drum for filter bags from the recirculation line, labeled “Hazardous Waste Flammable Liquid D001”.

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Photo 27: Photo taken by Rob Wallace, Environmental Manager at Allen Plant. 55-gal Hazardous waste drum in Primary CAA.