

RCRA Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

NCI Group, Inc. DBA Metal Coaters of Georgia (Metal Coaters)
1150 Marietta Industrial Drive NE
Marietta, Georgia 30062

EPA ID # - GAD000827873

3) **Responsible Official**

Robert S. Johnson
Manufacturing Manager

4) **Inspection Participants**

Daryl Himes, US EPA
Kayla Acosta, US EPA
Jasmine Fluornoy, GA EPD
Robert S. Johnson, Metal Coaters
Mary Zeagler, Metal Coaters

5) **Dates of Inspection**

June 3, 2021

6) **Applicable Regulations**

Resource Conservation Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992k Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§ 6925 and 6927 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279

The Georgia Hazardous Waste Management Act, §§ 12-8-60 to 83 of the Official Code of Georgia Annotated

Chapter 391-3-11 of the Georgia Hazardous Waste Management Rules (GHWMR) (The Rules found in Chapter 391-3-11 were incorporated by reference 40 C.F.R. Parts 260-270, 273, and

279. Therefore, the citations in this report will be to the Rules found in 40 C.F.R. Parts 260-270, 273, and 279.)

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the facility's compliance with all applicable RCRA regulations.

8) Facility Description

The Metal Coaters' facility consists of metal buildings constructed on concrete slabs. The operations performed by the facility include metal preparation and painting activities.

Metals to be painted by the facility include steel and aluminum rolls of sheet metal ranging from 29 to 60 inches in width. The customers of Metal Coaters own the rolls of sheet metal to undergo surface preparation and painting operations.

The metal preparation operations performed at the facility include the use of caustic solutions consisting of sodium and potassium hydroxide followed by a solution of fluoro-titanic acid. The metal preparations are used to remove oils applied to the metals upon their production for oxidation prevention. The oils removed from the surface of the sheet metals during their placement in the caustic solutions are captured and managed both at the location of the caustic solution baths and within the facilities wastewater treatment system.

The wastewater treatment system activities performed include the addition of lime, Redux and polymers resulting in the generation of a nonhazardous sludge. Oils captured at the location of caustic baths on the production line and by the wastewater treatment system are managed as a hazardous waste oil (D007) based on the chromium levels in the waste oil and the likelihood that some of the chromium content is in hexavalent state. The wastewater treatment facility at this location discharges its wastewaters to the Cobb County Water System (Permit # 423) publicly owned wastewater treatment system, which is a permitted discharge to a municipal sewer system under Section 402 of the Clean Water Act.

The facility filed its most recent Notification of Hazardous Waste Activity on February 27, 2020. The notification submitted by Metal Coaters of Georgia indicated that the facility was a large quantity generator of characteristic and listed hazardous wastes including D001, D002, D007, D035, F003 and F005.

9) Findings

Upon arriving at Metal Coaters, the EPA representative presented credentials to Robert Johnson, Materials Manager at the facility and Mary Zeagler, Quality Environmental Management Systems Technologist. The inspection proceeded with Robert Johnson, Mary Zeagler and the other EPA and GA EPD representatives. Prior to performing a walk-through inspection of the facility, a brief discussion was held with Mr. Johnson and Ms. Zeagler concerning current operations at the facility.

Below are the findings of the walk-through inspection.

The walkthrough inspection began in the facility in which the rolls of sheet metal are loaded onto spools. The sheet metal is then pulled through the metal preparation and painting activities that are performed in making the finished product. Metal preparation and painting activities include chemical treatment, mechanical treatment, painting (primer and finish coats), post-painting heat treatment and water quenching operations.

Chemical Treatment and Hot Water Rinse Operations

Wastewaters are generated during the chemical treatments of the sheet metal. Caustic and acid baths are used to remove the oil added to the sheet metal for oxidation purposes.

Oily water is separated from the baths at this location via gravity oil/water separation vessels (Photos 1 and 3). Concentrated oily water is then skimmed off the surface of separation vessels and piped into a 55-gallon drum (Photo 2) within a satellite accumulation area. The drum was labeled with the words “Hazardous Waste” and marked with a D007 characteristic hazardous waste code indicating that it was hazardous for chromium. Other waste waters from this location are piped to the facility’s wastewater treatment plant

Mechanical Treatment Operations

The sheet metal is then pulled through various rollers to remove irregularities in the sheet metal in preparation of painting operations. No wastes are generated from these operations.

Painting Operations

The sheet metal is painted with a primer and finish coats in a two-story painting building within the main building.

The upstairs area is used for the application of the primer coat to the metal. Two 55-gallon containers of hazardous waste within separate satellite accumulation areas (SAAs) were observed in this part of the building. One of the containers was used for hazardous waste solids including paper and/or filters contaminated with liquid paint wastes. The other drum contained hazardous liquid paint wastes. Each of the containers were closed, labeled with the words “Hazardous Waste” and marked with the characteristic hazardous waste codes of the waste at the time of the inspection. One of the containers had a latch to secure the lid to the top of the container which was not fastened at the time of the container.

The EPA recommends that generators managing liquid hazardous waste in satellite accumulation containers keep those containers closed with a fastening device when hazardous waste is not being added or removed from the container.

The downstairs area is used for the application of the finish coat. Three 55-gallon containers of hazardous waste were observed in separate SAAs. One of the containers was used for hazardous waste solids including paper and/or filters contaminated with liquid paint wastes, one container was used for liquid paint wastes, the other container for hazardous waste paint solvents. Each of the containers were labeled with the words “Hazardous Waste” and the hazardous waste codes associated with the waste in the containers. One of the containers was equipped with a latch,

which was not fastened at the time of the inspection. Each of the containers were closed at the time of the inspection.

The EPA recommends that generators managing liquid hazardous waste in satellite accumulation containers keep those containers closed with a fastening device when hazardous waste is not being added or removed from the container.

90 Day Hazardous Waste Accumulation Area

This area was located immediately outside of the main building. At the time of the inspection, 60 55-gallon drums of hazardous waste consisting primarily of paint related wastes were observed in this area. Each of the containers were labeled with the words “Hazardous Waste” and the hazardous waste code associated with the waste. Each container was closed and marked with an accumulation start date. The oldest accumulation start date observed on a container was 4/27/2021. The area was equipped with spill equipment and a fire extinguisher.

Maintenance Area

The facility accumulates universal hazardous wastes in this area. At the time of the inspection, the following universal hazardous wastes were observed:

Two 4-foot and two 3-foot cardboard tubes of fluorescent lamps were observed to be closed and labeled with appropriate universal waste labeling. One of the containers was not dated at the time of the inspection. A review of the facility’s universal hazardous waste manifests indicated that the last shipment of universal waste off-site was within the past year.

One 55-gallon container of e-waste was also observed in this area. The container was closed, labeled with appropriated universal waste labeling, and marked with an accumulation start date of less than one year.

Wastewater Treatment Area

Wastewaters from the sheet metal cleaning operations are transferred to the facility’s onsite wastewater treatment system. The onsite wastewater treatment system discharges to the Cobb County Water Treatment System. As a result of its wastewater treatment operations, the facility generates a nonhazardous waste sludge which is collected in a hopper beneath a filter press. The sludge is subsequently transferred to a roll-off located outside of the building.

The wastewater treatment system also skims a waste oil from an oil from one of the treatment tanks into a separation unit. The waste oil from this unit is periodically transferred to 55-gallon drums. At the time of the inspection, there were no containers of the hazardous waste oil in the area of the wastewater treatment operations.

Record Review

The facility’s manifests, contingency plan, training records and inspection records were reviewed.

All of the records reviewed were presented to the inspectors electronically on a screen within a conference room.

During a review of the facility's contingency plan dated 5/15/2020, it was observed that evacuation routes were not indicated on a diagram of the facility provided. *Specifically, the diagram did not have any arrows indicating paths or routes for employees to follow while exiting the building.*

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.261 (f)] the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.

No discrepancies were observed during a review of the last three years of the facility's hazardous waste manifests.

During a review of the facility's personnel training records, A 2020 hazardous waste training record for Nick Pittman, Maintenance Manager, could not be found for 2020.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that document that the training required has been given to and completed by Facility personnel.

During the review of the facility's weekly container inspection logs, it was determined that parts of logs for 6/23/2020 and 7/8/2020 documenting the condition of containers was not filled in on the electronic inspection form.

It is recommended that the generator comply with the inspection requirements for hazardous waste containers at its facility by completing all parts of each checklist.

An out-briefing was performed following the record review with the five inspection participants listed in Section 4 above present. During the review, each of the areas of concern noted in this inspection report were discussed with facility personnel.

10) **Signed**

Daryl R. Himes
Inspector and Author of Report

Date

11) **Concurrence and Approval**

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

NCI Group, Inc. DBA Metal Coaters of Georgia

Marietta, Georgia

COMPLIANCE EVALUATION Inspection

GAD000827873

June 3, 2021

Photos taken by Daryl R. Himes



Photo 1 – Oil Skimming tank in Chemical Treatment Tank Area



Photo 2 – Hazardous waste oil generated from oil skimming tank shown in Photo 1



Photo 3 – Oil Separation tanks in Chemical Treatment Area