

RCRA Inspection Report

1) Inspector and Author of Report

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Environmental Engineer
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U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Precision Flooring Products, Inc.
1735 West First North Street
Morristown, Tennessee 37815
Hamblen County

EPA ID: TNR000034496
NAICS: 321918 - Other Millwork (including flooring)

3) Responsible Official

Dave Wallace
President
Precision Flooring Products, Inc.
1735 West First North Street
Morristown, Tennessee 37815
dave@preflooring.com

4) Inspection Participants

Dave Wallace, Precision Flooring Products, Inc.
Abelardo Canuta, Precision Flooring Products, Inc.
Rodney Watson, Precision Flooring Products, Inc.
Pamela Rudd, TDEC
Paula Whiting, U.S. Environmental Protection Agency, Region 4

5) Date and Time of Inspection

May 20, 2024, at 9:00 a.m. EDT

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

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.

Tennessee Hazardous Waste Management Act of 1977, Tennessee Code Annotated (Tenn. Code Ann.) § 68-212-101 et seq., and Chapter 0400-12-01 of the Rules and Regulations of the State of Tennessee (Tenn. Comp. R. & Regs.)

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g) [40 C.F.R. § 262.16)], SQG may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g) [40 C.F.R. § 262.16] (hereinafter referred to as the “SQG Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste 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 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(1)(i) [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, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Precision Flooring Products, Inc., EPA ID Number: TNR000034496 with the applicable regulations. This was an EPA lead inspection.

8) Facility Description

Precision Flooring Products, Inc. (Precision) is a manufacturer and distributor of customized prefinished moldings to the hardwood flooring industry throughout North America. In addition, Precision manufactures wood ceiling grids for one specific customer. Precision receives the hardwood, cuts the wood to size, and then sands it. The flooring and ceiling grids are stained using water-based stains and then an ultraviolet coating is added as a finish.

Precision employs 130 employees with 2-3 employees handling hazardous waste. The facility operates one shift, 10 hours a day, four days per week.

Precision's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 26, 2021, characterized the facility as a Small Quantity Generator (SQG) of hazardous waste. Precision Flooring Products, Inc. may generate hazardous waste streams, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste, and other wastes. The hazardous waste may be designated to the following EPA Waste Codes D001, D018, F003, and F005.

9) Previous Inspection History

This facility was last inspected on February 21, 2023, by Tennessee Department of Environment and Conservation (TDEC). Eight deficiencies were noted which were resolved with informal enforcement on November 2, 2023.

10) Findings

On May 20, 2024, EPA inspector Paula Whiting, accompanied by TDEC inspector Pamela Rudd arrived at Precision Flooring Products, Inc. at approximately 9:00 a.m. EDT. The inspectors entered the facility and were escorted to a conference room by Mr. Dave Wallace, President. The inspectors introduced themselves, showed their credentials to the representative, and explained the purpose of the visit.

The inspectors described the anticipated use of a 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 the EPA. The company did not assert a business confidentiality claim.

Mr. Wallace 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 representative led the inspectors on a tour of the facility's operations. Below is a description of the observations made during the inspection.

11) Inspection Observations

11.1 Millworks

The facility tour began in Millworks (carpentry) where the incoming lumber is stored outside, in open-sided sheds. The lumber is already dried and machine ready to cut to size. The inspectors observed three 55-gallon containers of metal binds to be recycled (Picture 1). Mr. Wallace

explained that the scrap wood from the cut lumber will be ground up to make saw dust and sold to American Wood Fibers for pet bedding. No hazardous waste was observed in this area.

11.2 Rough Mill

Inside the building is the Rough Mill where the lumber is cut to size. The inspectors observed throughout the facility that several fire extinguishers had expired annual certification tags dated 2022 (pink) and (green) 2023 (Picture 2). No hazardous waste was observed in this area.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(viii)(III) [40 C.F.R. 262.16(b)(8)(iii)], which incorporates, and is a condition of the SQG Permit Exemption, All communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested, and maintained as necessary to assure its proper operation in time of emergency.

11.3 Sanding

The cut lumber is then sanded for staining. No hazardous waste was observed in this area.

11.4 Grid Staining – Ultraviolet (UV)

At the entrance of the grid staining area is the stain room with water-based stains. Cloths are used to apply stains into the hardwood. The facility launders the used cloths in a washing machine on site. The washing machine water is discharged to the sewer via a floor sump because the original building did not have sewer piping connected in this area (Pictures 3-4). No hazardous waste was observed in this room.

The ultraviolet staining used on the grid is non-hazardous waste. Mr. Wallace explained the ultraviolet base is mixed with the tint and applied to the hardwood via an application machine to cure the stain-tinted UV coating (Pictures 5-6). The inspectors observed multiple 5-gallon and 55-gallon containers of specialty tint that are blended per customer request (Pictures 7-10). The floor and the tops of some of the containers were covered in coating. Containers were open and scattered throughout the area. The inspectors expressed concern about the housekeeping in the area. This is an area of concern.

A 55-gallon SAA container of waste acetone was observed closed, labeled, and dated May 20, 2024 (Pictures 11-12). The inspectors stated that SAA container was not required to be dated until it was full and ready to be moved to the central accumulation area (CAA). The SAA container was near the UV coating application machine. The inspectors observed a coater box below the application machine that captured the discarded ultraviolet coating from the color changes (Picture 13). Acetone is used to clean up the discarded coating and the waste mixture is discarded in the SAA container.

11.5 Molding

The molding area manufactures and stores the hardwood floor transition strips used between hardwood and other types of flooring. No hazardous waste was observed in this area.

11.6 Stain Room

The stain room is where the employees manually apply stains using the laundered cloths to the hardwood molding. No hazardous waste was observed in this area.

11.7 Stain Library

The stain library is an extensive shelving system that stores multiple sample colors. The stains are cataloged and numbered, which allows the facility to easily identify the proper tint requested by the customer. No hazardous waste was generated in this area.

11.8 Mixing Room

The mixing room is where the sample colors are mixed per customer request. All the stains are water-based tints, and if a color is not correct, then the stain is adjusted to obtain the requested color. Discarded stain is non-hazardous and collected in a 5-gallon container (Picture 14). No hazardous waste was generated in this area.

11.9 Maintenance

The inspectors observed aerosol cans stored in a metal cabinet (Picture 15). A can of Lectra-Motive electric parts cleaner contained the volatile organic compound Tetrachloroethylene (PCE). The aerosol cans were still in use and in good condition. The inspectors stated that when any of the aerosol cans in the cabinet become spent and are ready to be discarded the facility is required to collect and store the spent cans as universal waste under 40 C.F.R. 273 or as hazardous waste under 40 C.F.R. 262.16. At the time of the inspection, the inspectors did not observe any spent aerosol can in the trash. No hazardous waste was observed in the area.

11.10 Equipment Storage

Outside the Maintenance Shop was a large warehouse used as equipment storage. A large wooden box marked as 'Universal Waste Lamps for Recycling' was stored along the rear wall (Pictures 16-18). Inside the box was spent lamps. The box was closed, labeled, and dated February 22, 2024.

11.11 Air Compressor

Next to the equipment storage warehouse was a room with two air compressors. Mr. Wallace explained that a contractor changes the oil from the compressors. The inspectors observed that both air compressors were releasing used oil on the ground around the units (Pictures 19-23). Absorbent oil dri was randomly placed around the units, but the used oil had not been cleaned up immediately.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.11(3)(c)4. [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

11.12 Drum Consolidation

A drum consolidation area was located inside the equipment storage warehouse. At the time of the inspection, the inspectors observed the following:

- One 55-gallon container with a bung opening that was not closed, had contained a sludge consistency of an unknown substance (Pictures 24-27)

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must 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 articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

- One 55-gallon container of dried water-based paint (Picture 28)
- One 55-gallon container of spent water-based paint with metal lids inside (Picture 29)
- One 55-gallon container of spent water-based paint sludge with trash inside (Picture 30)
- Multiple 5-gallon containers of spent water-based paint to be consolidated (Pictures 31, 34)
- One blue 55-gallon container of solvent waste material that was peeling lining from the interior (Picture 32)

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must 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 articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

- Multiple 55-gallon containers of spent paint waste (Picture 33)
- The cardboard compressor was leaking oil on the ground (Picture 35)

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.11(3)(c)4. [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

11.13 Distill/Recycle

The distillation and recycling center is located inside the Stain Room. The inspectors observed a SAA with a 55-gallon CAA container of waste solvent and stain from Grid Staining dated April 1, 2024, a 55-gallon container of acetone product to be used, a 55-gallon SAA container of waste still bottoms that was almost full, and a Safety-Kleen distillation unit (Pictures 36-38). Mr.

Canuta explained that the distillation unit only processes 5-gallons at a time, and the process takes a week to distill the 5 gallons. Thus, the 55-gallon container of waste solvent and stain is a CAA container waiting to be distilled. The waste containers were closed, labeled with the words 'hazardous waste' and hazard indicators, and dated.

On the wall above the distillation unit was an emergency contact telephone posting form (Picture 39). However, the form was incomplete and only listed the emergency contacts, not the location of the emergency response equipment.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(ix)(II) [40 C.F.R. 262.16(b)(9)(ii)], which incorporates, and is a condition of the SQG Permit Exemption, the small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste: (A) The name and emergency telephone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and (C) The telephone number of the fire department, unless the facility has a direct alarm.

Mr. Canuta provided the weekly inspection forms for the CAAs (Picture 40). The form provided the container date, number of containers in the CAA, and the amount of waste.

11.14 Less than 180-Day Central Accumulation Area

The CAA is a separate room with a sliding door to secure the area. Affixed on the exterior wall were "Hazardous Materials Storage Area, Unauthorized Persons, Keep Out", "Danger, Flammable Liquids, No Smoking, Matches or Open Lights" signs and the emergency contact telephone posting form (Picture 44). However, the form was incomplete and only listed the emergency contacts, not the location of the emergency response equipment.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(ix)(II) [40 C.F.R. 262.16(b)(9)(ii)], which incorporates, and is a condition of the SQG Permit Exemption, the small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste: (A) The name and emergency telephone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and (C) The telephone number of the fire department, unless the facility has a direct alarm.

Inside the CAA, the inspectors observed a 55-gallon container of still bottoms that was labeled, closed, and dated May 15, 2024, a 55-gallon container of waste paint with acetone to be distilled, that was labeled, closed, and dated May 10, 2024, and a fire suppression sprinkler system installed on the ceiling (Pictures 41-43, 45).

11.15 Spray Booth

The inspectors observed six one-gallon containers of expired solvent (Picture 46). The containers were stored underneath a table beside the spray booth and were covered in dust. Mr. Wallace was not aware that the cans were onsite. Behind the spray booth was a 55-gallon

container of unknown content with a hazardous waste label (Pictures 47-49). The container was turned around and Mr. Wallace identified the container as ultraviolet stain that was no longer in use.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must 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 articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

The spray booth is a three-sided area where non-hazardous, water-based urethane is applied to wood strips (Picture 50). The spray booth technician explained that the discarded filters are given to Tim Garrett, EHS, and placed in a box outside. The inspectors asked where the box is kept but Mr. Wallace and Mr. Canuta were not aware of the location. The inspectors stated prior to disposal that the discarded filter needed a hazardous waste determination, and an application for a special disposal permit for the discarded filters.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must 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 articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

11.16 Solvent Fill Station

Beside the distill/recycle area where two 55-gallon product containers laid on their sides in a drum holder. The first container held new alcohol and the second container held new acetone with a runoff bucket underneath (Pictures 51-52). Mr. Canuta explained that the contents of the runoff bucket were generated when the employees poured up small containers of acetone for their workstations. The accumulated runoff was then placed into the SAA container by the distillation unit. The inspectors observed the runoff bucket was not closed when not in use, and not labeled. In addition, the emergency response contact form was not posted above this SAA. The inspectors then asked why the runoff bucket contents were not being used considering the new acetone was not contaminated.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(iv) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(v) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(ix)(II) [40 C.F.R. 262.16(b)(9)(ii)], which incorporates, and is a condition of the SQG Permit Exemption, the small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste: (A) The name and emergency telephone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and (C) The telephone number of the fire department, unless the facility has a direct alarm.

12) Records Review

The inspectors requested the training records, the weekly inspection records, the waste minimization plans, annual reports, the 2021-2024 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated February 26, 2021.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Tim Garrett, David Linn, who retired in March 2024, and Abelardo Canuta were requested. The records were not available for review because Mr. Garrett was on vacation at the time of the inspection. On June 3, 2024, the EPA received copies of the basic training document and the roster of employees provided annual safety training in October 2023 and May 2024. Mr. Wallace stated that every year, Tim Garrett conducts health and safety training to their employees. Mr. Garrett goes over the hazardous waste section that the inspectors previously received. Mr. Wallace attached a copy of the attendees of that training.

The weekly inspections for the 180-day CAA were reviewed. The weekly inspections conducted by Mr. Canuta were missing the time of day the inspections were conducted.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(ii)(IV)II [40 C.F.R. § 262.16(b)(2)(iv)], The small quantity generator must record inspections required by subitem I of this item in an inspection log or summary. The small quantity generator must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

The Contingency Plan was not available at the time of the inspection, because Mr. Garrett was on vacation. In addition, Mr. Wallace confirmed that no arrangement had been made with the Local Emergency Planning Committee (LEPC) such as the fire department, police, and hospital. On May 30, 2024, via email, Mr. Wallace provided a copy of the Contingency Plan for Hazardous Waste Spill at Precision Flooring Products to the inspectors.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(viii)(VI) [40 C.F.R. § 262.16(b)(8)(vi)], which is a condition of the SQG Permit Exemption, a generator is required to (A) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at his facility and the potential need for the services of these authorities, and (B) maintain records documenting the arrangements made.

The Hazardous Waste Reduction Plan was reviewed. The plan was missing the waste code for acetone, and the facility failed to create an annual progress report documenting the facility's continuing waste reduction efforts and include updated goals and objectives.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(b)1(iii)(I) [40 CFR 262.41], 1. A generator who is a large or small quantity generator for at least one month of the calendar year who ships any hazardous waste off-site to a treatment, storage, or disposal facility within the United States must complete and submit an annual report to the Commissioner by March 1 for the preceding calendar year. Such report must be submitted on forms provided by the Commissioner, and the form must be completed according to the instructions accompanying it. The report must include, but shall not necessarily be limited to, the following information: (iii) For each hazardous waste stream (i.e., each separate waste but not necessarily each batch or shipment of such waste) generated by the generator during the reporting year, except for those wastes identified in part 4 of this subparagraph, the following information: (I) A descriptive name of the waste and the appropriate waste code(s) from Rule 0400-12-01-.02.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(6)(c), 1. All generators shall annually review their waste reduction plan and complete a hazardous waste reduction progress report which shall: (i) Analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under subparagraph (b) of this paragraph. (ii) Set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments. 2. Except for the information reported to the department under paragraph (5)(b) of this rule, Annual Reporting, the annual progress report shall be retained at the facility and shall not be considered a public record. However, the generator shall permit any officer, employee, or representative of the department at all reasonable times to have access to the annual progress report.

The inspectors observed that the facility reported the generation of waste distillation bottoms on the annual report, which gets reported on the waste stream report (WSR) for waste thinner and the stains, which gets generated as pre-distillation. The facility however, failed to notify the TDEC of its waste distillation bottom waste stream. The facility must submit a notification to the TDEC about its waste distillation bottoms.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(2)(d)(i)(IV) Small and large quantity generators shall be responsible for maintaining an up-to-date notification file by generating a new hazardous waste stream.

The waste profile for the paint bottoms still sludge was reviewed. A sample was analyzed as a soil and not a waste, so the results indicated the sample to be non-hazardous. However, the sample analyses included volatile organic compounds and semi-volatile organic compounds which were listed in the analysis results as over the required temperature of 4-6°C, and thus not viable. The inspectors stated that the paint bottoms still sludge would have to be properly sampled, preserved, shipped on ice, and reanalyzed as a waste sample and not as a soil sample.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must 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 articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

Hazardous and non-hazardous manifests were reviewed for 2021-2024. Hazardous and universal wastes were shipped Clean Earth of Alabama EPA ID (ALD981020894) in Glencoe, AL and to Electrical Technology Recycling in Morristown, TN. Non-hazardous wastes were shipped to American Biomass (Permit 152630-2001) in Walterboro, SC. The land disposal restriction forms were reviewed.

13) Summary

The inspectors conducted an exit meeting with Mr. Wallace. During this meeting, TDEC presented the preliminary results of the inspection. Precision Flooring Products, Inc. was inspected as a SQG of hazardous waste.

On May 23, 2024, Mr. Wallace emailed the inspectors the following:

Attached are some photos of the remedial actions mentioned below. If the photo descriptions are not clear, let me know and I will explain further.

As to the new Hazardous Waste stream, we are currently in the process of determining whether the required waste stream and the additional record keeping outweigh the benefit of recycling the acetone. If we decide to simply discard the material without recycling, we would like to amend our current waste stream to include the acetone waste code. We expect to have a conclusion within the next 10 days, and I will keep you advised of what we determine.

On May 30, 2024, Mr. Wallace sent a follow email to the inspectors:

Attached are some additional items from the 5-20-24 inspection. Those items are as follows:

1. *Contingency plan pertaining to Fire, Police and Hospital.*
2. *Basic training document for SQG facility.*
3. *Photo of Spray Can disposal with signage call it Universal Waste.*
4. *Application to TDEC to haul away non-hazardous spray booth filters.*
5. *Fire extinguisher service invoice (regularly scheduled service occurred shortly following the inspection); and*
6. *A new weekly hazardous waste inspection form indicating a time and comment section.*

As to some of the other items requested, the oil in the air compressors is changed every 2-3 years by internal maintenance employees. The Hamblen County landfill is the facility where the non-hazardous filters have been deposited.

We have also been studying the additional waste stream required for recycling. Our preliminary investigation concludes that the additional reporting requirements are too onerous and complicated for us to continue to recycle the acetone. We are currently evaluating our options and will have something for you soon.

14) List of Attachments

Attachment A – Photo Log: 52 photos.

15) Signed

**PAULA
WHITING**

Digitally signed by PAULA
WHITING
Date: 2024.07.22 08:11:36
-04'00'

Paula A. Whiting
Environmental Engineer

14) Concurrence

**ALAN
NEWMAN**

Digitally signed by ALAN
NEWMAN
Date: 2024.07.22
08:39:04 -04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

PRECISION FLOORING PRODUCTS, INC.

MORRISTOWN, TENNESSEE

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

MAY 20, 2024

**Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374**



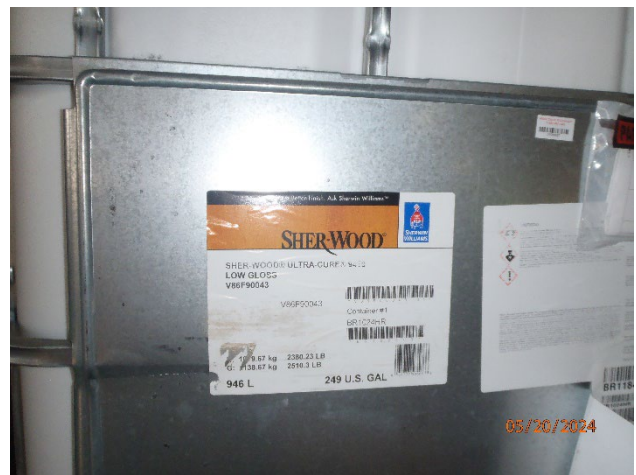
Picture 1 – Rough Mill/Storage metal binds to recycle



Picture 4 – Sanding Staining WW sump and used cloths



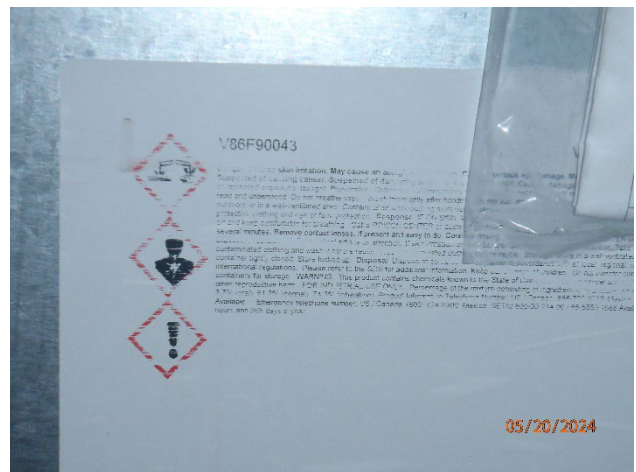
Picture 2 – Expired fire extinguisher annual certification tag



Picture 5 – Grid UV Staining UV label



Picture 3 – Sanding Staining WW sump and used rags



Picture 6 – Grid UV Staining UV label





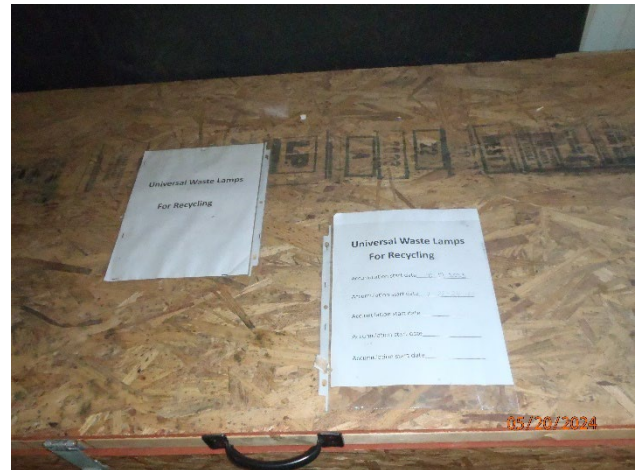
Picture 13 – Grid UV Staining UV catch basin



Picture 14 – Mixing Room water-based paint waste



Picture 15 – Maintenance aerosol cans



Picture 16 – Equipment Storage Universal Waste Lamps



Picture 17 – Equipment Storage Universal Waste Lamps



Picture 18 – Equipment Storage Universal Waste Lamps



Picture 20 – Air Compressor Room used oil release



Picture 19 – Air Compressor Room used oil release



Picture 21 – Air Compressor Room used oil release



Picture 22 – Air Compressor Room used oil release



Picture 25 – Drum Consolidation open container



Picture 23 – Air Compressor Room used oil release



Picture 26 – Drum Consolidation open container



Picture 24 – Drum Consolidation open container



Picture 27 – Drum Consolidation open container



Picture 28 – Drum Consolidation dried water based paint



Picture 31 – Drum Consolidation spent water based paint



Picture 29 – Drum Consolidation spent water based paint



Picture 32 – Drum Consolidation spent paint waste - HW



Picture 30 – Drum Consolidation spent water based paint



Picture 33 – Drum Consolidation



Picture 34 – Drum Consolidation



Picture 37 – Distill/Recycle Area



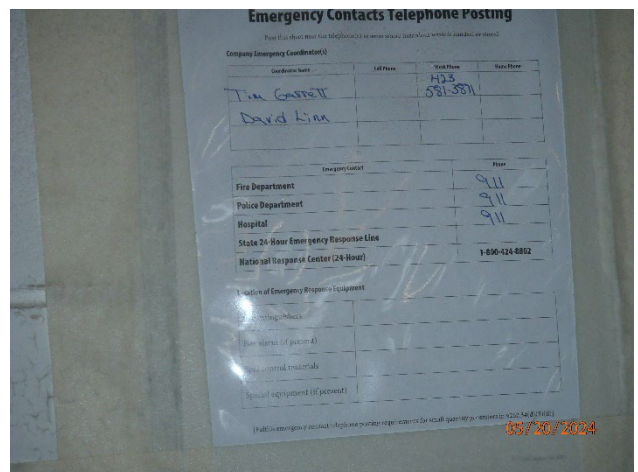
Picture 35 – Cardboard box compressor used oil released



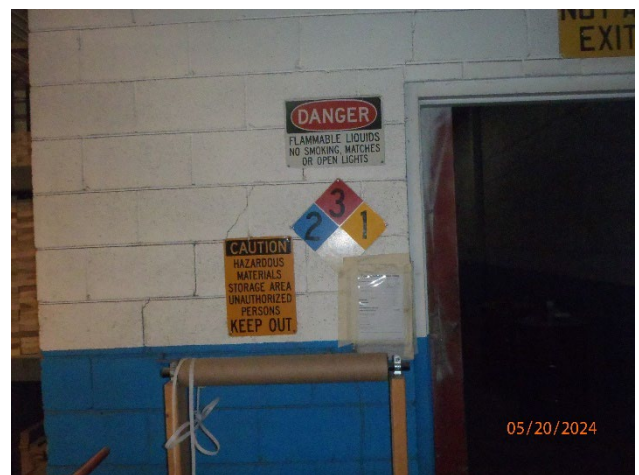
Picture 38 – Distill/Recycle Area



Picture 36 – Distill/Recycle Area

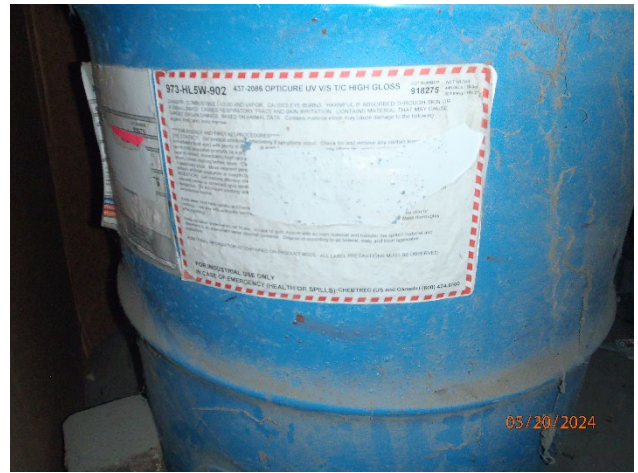


Picture 39 – Emergency Response Contact List

[illegible]



Picture 46 – Spray Booth expired chemicals



Picture 49 – Spray Booth HW container label



Picture 47 – Spray Booth HW container and label



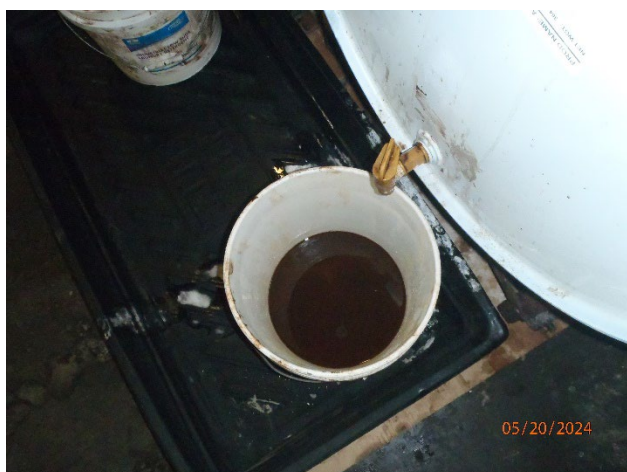
Picture 50 – Spray Booth paint filters



Picture 48 – Spray Booth HW container label



Picture 51 – Acetone/Alcohol Fill Station



Picture 52 – Acetone/Alcohol Fill Station spill container