

RCRA Inspection Report

1) Inspector and Author of Report

Raj Aiyar
Environmental Engineer
Phone: 404-562-8993
aiyar.raj@epa.gov

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

Precoat Mezzanine LLC dba Precoat
Metals

EPA ID#: MS0000043307
NAICS #: 332812- Metal Coatings

1095 Mendell Davis Drive
Jackson, Mississippi 39272
Hinds County
(601) 372-0325

3) Responsible Officials

Anu Singh, Environmental Health and
Safety

Rob Nemeth, Facility Manager
robert_nemeth@precoat.com
(601) 718-1430

4) Inspection Participants

Brian McDonald, Precoat Metals
Brad Justice, MDEQ
Raj Aiyar, U.S. EPA , Region 4

5) Date of Inspection

02/27/2025, 9:00 a.m.

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; Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 et seq., and Mississippi Hazardous

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.

Waste Management Regulations, 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24; and Hazardous Waste Permit HW-89-765-01.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.1 [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 11 Miss. Admin. Code Pt. 3, R. 1.21 [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 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Precoat Metals (hereinafter, “Precoat” or the “facility”) compliance with the applicable requirements of RCRA and the corresponding Mississippi regulations. This was an EPA lead inspection.

8) Facility Description

Precoat Metals is located at 1095 Mendell Davis Drive in Jackson, Hinds County, Mississippi. The main building is located on approximately 12 acres and has approximately 225,000 square feet under roof. Precoat also has a warehouse across the street from the plant. Precoat currently employs approximately 100 employees and operates 24 hours per day, six and/or seven days a week.

Precoat sends finished coating metals to variety of customers in construction, appliance

manufacturers, HVAC and transportation. The City of Jackson supplies the potable water and provides domestic waste service.

Precoat provides corrosion resistance to rolls of cold-rolled steel, galvanized and galvalume steel, aluminum, and stainless steel. Precoat utilizes a warehouse for the storage of the raw material received by rail. Precoat uses a continuous process to uncoil and feed the coiled material into the coating process, stitching rolls of the metal together as required to maintain the feed. The various stages of cleaning of the coiled material to remove dirt, oil and other impurities occurs in the wet section of the process (Picture-1).

In the first stage, the galvanized steel is cleaned with a hot alkaline solution of potassium hydroxide (Parco Cleaner 8686) to removal the oil and grease. The second stage is comprised of a brushing unit. In this stage, the steel is rinsed with hot water and brushed to remove any excess caustic material. In the third stage, a caustic cleaner (Parco Cleaner 8686) is again used. The fourth stage is comprised of a hot water rinse. In the fifth stage, the galvanized steel is treated with conversion coating solutions of titanium (Parcolene AT) and in the sixth stage, the galvanized steel is treated with Bonderite 1421-A, 921 RF, 902 and the cleaning process is completed with a hot water rinse.

After leaving the Wet Section, the metal coil continues to be primed and coated in a conversion process. The conversion process allows the paint to stick to the surface of the metal. The vinyl sealer (Bonderite 1402 W) is rolled onto the surface, then the coil goes through an oven heated to 200°F to allow the sealer to dry in place. After surface preparation is completed, the metal is painted with various primers and finish paints depending on the customer's needs.

Precoat's painting includes priming ovens, the downstairs coater room and the upstairs coater room, and finish. The downstairs coater room is for the primer as well as finish coating while the upstairs coater room is for finish coating only. The paints are oven dried onto the metal. Following the oven are two quench tanks containing contact cooling water. The metal is cooled to 150° F-165°F in the quench tanks. The water is reused in the tank until it becomes dirty to be reused. The metal is then rewound, packaged and shipped to the customers.

Precoat was inspected as a large quantity generator (LQG) of hazardous waste. Painting and paint related wastes are the main source of hazardous waste generated onsite. The waste codes for the hazardous waste generated onsite includes D001, D002, D007, D035, F002 and F005. Records indicate that the quantity of hazardous waste shipped approximately in Calendar year 2023, 2024 and 2025 was 336 kg, 348 kg and 85 kg. Precoat uses Lone Star Industries Inc. (MOD9811127319), Tradebe (TND000772186), and Reclaimed Energy Inc. (IND000780403) to dispose of their hazardous waste.

9) **Previous Inspection History**

Precoat was last inspected by the EPA and MDEQ on November 17, 2020. There were no deficiencies observed during the inspection.

10) Opening Conference

On February 27, 2025, EPA inspector Raj Aiyar, accompanied by MDEQ inspector Bradley Justice, arrived at Precoat facility at approximately 9:00 am. The inspectors introduced themselves, showed their credentials to Robert Nemeth and Brian McDonald and explained the purpose of the visit. Anu Singh from the Corporate office joined us over the phone. Robert Nemeth and Brian McDonald provided the inspectors a general description of the on-site activities at the facility.

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 facility's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The facility did not assert a business confidentiality claim.

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 operations. The inspectors were later accompanied by Brian McDonald during the walk-through inspection of the facility.

11) Inspection Observations

Downstairs Coater: The inspection team made their first visit at the 90-day central accumulation area (CAA) located at the downstairs coater room. Brian McDonald stated safety concerns for taking photos in the coater room due to the work environment and the intrinsic nature of the chemicals being processed and stored in the coater room. No photographs were taken in this area. The facility was in the midst of color change during the inspection. There were three 55-gallon waste containers observed in this 90-day area. One 55-gallon CAA waste container was observed to be open; the container was in use at the time of inspection. All the CAA waste containers were observed to be labeled with the words "Hazardous Waste"; an indication of the hazards of the contents and the date upon which each accumulation begins. The oldest accumulation start date was noted to be 02/20/2025.

Upstairs Coater: Similarly, another 90-day CAA is operated at the upstairs coater room. No photographs were allowed in this area also due to safety reasons. Three 55-gallon CAA waste containers were observed in this 90-day area. One 55-gallon waste container was observed to be open during the inspection. The waste container was observed to be labeled with the word "Hazardous Waste"; indication of the hazards of the contents and with an accumulation start

date. Excess scrap paint from the process rollers were being added to the open 55-gallon hazardous waste container. Two other 55-gallon CAA containers were observed to be closed, labeled with the words “Hazardous Waste”; indication of hazards of the contents and with accumulation start date.

Drum Washer: The inspection team visited the drum washer satellite accumulation area (SAA). The inspection team observed one 55-gallon SAA container in this area. The SAA drum was observed to be closed and labeled with the words “Hazardous Waste” and with an indication of the hazards of the contents.

Paint Blend: Also located in the area were the paint blending shops. Precoat blends the paints as required for their customers. The waste is collected and accumulated as hazardous waste. The inspection team observed two closed SAA containers in this area. Both the containers were labeled with the words “hazardous waste” and with the indication of the hazards of the content. Both containers were observed to be dated with accumulation start date. The inspection team stated to the facility personnel if the containers were being managed for satellite accumulation, there was no need to have an accumulation start date.

90-day Central Accumulation Area.

The main storage area is a stand-alone building and is constructed with a concrete pad and surrounded by a sealed concrete secondary containment system. The concrete pad is constructed with a chain link fence on three sides and can be accessed through locked chain-link gates from each end of the building. The building is covered with a metal roof. The inspectors observed a sign at the entrance indicating the hazardous waste storage and a “No Smoking” warning sign.

The inspectors observed 96 55-gallon hazardous waste containers in the storage at the time of inspection (Photo-1 and Photo-2)). The inspectors observed four containers on each wooden pallet and the pallets were stacked two high with aisle space. All the containers were closed and labeled with the words “Hazardous Waste” and with an indication of the hazard of the contents (Photo-3). The waste codes on the drums were noted to be D001, D007, F003 and F005. The oldest accumulation start date on the drum was noted to be 01/06/2025. In addition, the inspection team observed two non-regulated waste containers containing used oil absorbents granules and one 220-gallon closed tote of used oil labelled as “Used Oil”. There were no leaks and spills observed in the storage area. The storage area was equipped with a fire extinguisher, eye-wash stations, spill kits and a carbon dioxide (CO₂) fire suppression system.

Wet Section: The wet section includes an SAA outside the lab (Photo-4). The SAA container was observed to be closed and labeled with the words “Hazardous Waste” and with an indication of the hazards of the contents (Photo-5). The waste codes on the SAA container were noted to be D002 and D007.

On the other side of the lab, the inspection team observed a universal waste (UW) accumulation area, and a satellite accumulation area (Photo-6). The SAA container was observed to be closed and labeled with the words “Hazardous Waste” with indication of the

hazards of the contents. The UW accumulation area contained used lamps and used batteries. There were two fiber boxes of used lamps and four containers of used batteries. All the universal waste containers were observed to be closed, labeled, and with an accumulation start date. The accumulation start date for the used lamps and the used batteries were 8/14/2024.

Wastewater Treatment Plant: The inspection team concluded their walk-through inspection at the wastewater treatment plant. The wastewater treatment plant was not in operation at the time of inspection. There were no solids observed at the time of the inspection, the hopper was empty.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The Contingency Plan (The Plan) included the emergency response and preparedness plan. The Plan was last updated on 1/22/2025. The Plan includes the general facility description including the roles and responsibilities along with the actions that facility personnel should take in response to an emergency. The Plan included arrangements with the local authorities including local police, fire department, other emergency response teams, local hospitals. The QRG included type of waste generated on site, waste codes, storage location and its maximum quantity. Other information included the names of the emergency coordinators and their contact information, location of fire alarm switches, fire water supplies and evacuation routes.

Training Records:

The training records for Brian McDonald were reviewed. The training records included job title, job description, description of training and the procedures. The facility maintains their internal training records electronically and refer to them as smart training records. The smart training records included DOT records from June 2023, June 2024, and January 2024.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The hazardous waste manifests for 2024 and 2025 were reviewed. The land disposal restriction (LDR) was included.

Weekly Inspection Records:

The weekly inspection logs for 2023, 2024 and 2025 were reviewed for completeness and accuracy. The three 90-day weekly logs comprised of the Upstairs Coater, Downstairs Coater and the main 90-day CAA. The checklist included aisle space, visible container labels, condition of the containers, housekeeping, spill response kit, fire extinguishers, container stacking and other relevant information.

Waste Profiles:

The waste profiles for all the waste generated onsite were reviewed including the waste profile

for the sludge from wastewater treatment.

Annual Reports:

The annual reports for 2022, 2023, and 2024 were available and reviewed on RCRAInfo on 3/14/2025.

Based on the review of the records, the records were observed to be complete.

13) Closing Conference

An exit briefing was conducted at the conclusion of the inspection. Brian McDonald, Precoat Metals, Brad Justice, MDEQ and Raj Aiyar, US EPA participated during the exit briefing. The observations made during the inspection were discussed and the inspection was concluded.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL
AIYAR
Date: 2025.05.07 06:54:51 -04'00'

Raj Aiyar
Environmental Engineer

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2025.05.07 11:42:00 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

Photos taken on: 02/27/2025

Photos taken by: Raj Aiyar, US EPA and Brad Justice, MDEQ

Photos taken with: KODAK PIXPRO FZ53

EPA Property Tag: SX9091



Photo-1 CAA Containers



Photo-2 CAA Containers



Photo-3 Containers in CAA (Labels and IOH)



Photo-4 SAA on Wet Side



Photo-5 SAA on Wet Side (Labels and IOH)



Photo-6 SAA and Universal Waste