RCRA Inspection Report

1) Inspector and Author of Report

William Kappler
Physical Scientist
Enforcement and Compliance Assurance Division
Environmental Protection Agency, Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8498

2) Facility Information

Metal Coaters
951 Prisock Road
Jackson, Mississippi 39272
Hinds County

EPA ID No.: MSD985980481

3) Responsible Officials

Todd D. Harbour
Vice President, Environmental Affairs
Cornerstone Building Brands
7301 Fairview St
Houston, Texas 77041
Todd.Harbour@cornerstone-bb.com
(281) 302-1765

Mr. Michael Thornburg
Plant Manager
Metal Coaters
951 Prisock Road
Jackson, Mississippi 39272
mdthornburg@metalcoaters.com
(601) 373-0374 ext 23401

Mr. Jeff Fero
Manufacturing Manager
Metal Coaters
951 Prisock Road
Jackson, Mississippi 39272
jfero@metalcoaters.com
(601) 346-5416

4) Inspection Participants

Michael Thornburg, Metal Coaters
Jeff Fero, Metal Coaters
Aliesha Harrell, Metal Coaters
Todd Harbour, Metal Coaters Cornerstone Building Brands
Rob Wallace, Metal Coaters Cornerstone Building Brands
Brad Justice, Mississippi Department of Environmental Quality
Leigh Tanner, Mississippi Department of Environmental Quality
William Kappler, Environmental Protection Agency, Region 4

5) Date and Time of Inspection

October 19, 2021, at 9:00 a.m.

6) Applicable Regulations

Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.* [Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008, (42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928)] and the Mississippi Department of Environmental Quality, Office of Pollution Control, Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24, which adopts and incorporates by reference 40 C.F.R. Parts 260-270, 273, and 279 [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279].

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

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 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 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], a large quantity generator (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 of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27 [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

On October 15, 2021, Environmental Protection Agency, Region 4 inspector William Kappler sent an email to Mr. Chico Doughtie, of Metal Coaters, to inform him that the EPA and the Mississippi Department of Environmental Quality (MDEQ) will be conducting a RCRA compliance evaluation inspection (CEI) on October 19, 2021, at 9:00 a.m. The EPA inspector asked Metal Coaters to provide a site map and a general process description of the manufacturing operation prior to the inspection. The EPA inspector's email provided a business card, a list of the RCRA records needed for review and an EPA small business resources information sheet.

On October 19, 2021, EPA inspector William Kappler accompanied by MDEQ inspectors Brad Justice and Leigh Tanner conducted an announced CEI at Metal Coaters (hereinafter, "MC" or the "facility") to determine the compliance status of the facility with the RCRA and the State of Mississippi regulations. This was an EPA-lead inspection. Inspectors arrived at MC at approximately 9:00 a.m. and MC Staff immediately received the inspectors. The inspectors were escorted to a meeting room for an opening conference. Mr. Todd Harbour and Mr. Rob Wallace attended the opening conference by phone. The inspectors introduced themselves, showed credentials, exchanged business cards, explained the purpose of the visit, the notification procedures due to the Covid-19, the EPA health and safety procedures, the general areas for inspection and the RCRA records needed for review. MC discussed health and safety procedures, personal protective equipment, an overview of the facility's current process operations and the RCRA records.

The EPA inspector described the anticipated use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. Metal Coaters 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.

Mr. Thornburg, Mr. Fero and Ms. Harrell of Metal Coaters led the inspectors on a tour of the facility's operations.

8) Facility Description

MC is located at 951 Prisock Road, Jackson, Hinds County, Mississippi. The facility has been at this location since 1995. The property consists of approximately 16.6 acres and the facility and property is currently owned by Cornerstone Building Brands. The facility consists of two buildings, the main manufacturing building, and the training center. The main manufacturing building is approximately 325,000 square feet and a total of 351,000 square feet, including the training center. The training center is located next to the main manufacturing building, but there are no manufacturing operations occurring in the training center. The facility employs approximately 90 people and operates Monday through Friday, 24 hours per day on three work shifts. The City of Jackson supplies the potable water and the domestic waste service. The primary NAICS code for the facility is 332812, metal coating, engraving (except jewelry) and

allied services to manufacturing.

MC was issued a Major Source Title V Operating Permit No.: 1080-00068, by MDEQ on August 3, 2020. The Title V permit expires on July 31, 2025. The permit is for the regulation of emission points and pollution control devices related to: The Continuous Coil Coating Line; the Total Enclosed Natural Gas-Fired Thermal Oxidizer (exhaust heats the ovens); and a 10,000-Gallon Virgin Solvent Storage Tank.

MC's most recent notification of its regulated waste activity to MDEQ was on March 1, 2021, notifying as a large quantity generator (LQG) and small quantity handler of universal waste (SQHUW).

9) General Process Description

MC produces coated and corrosion resistance to the surfaces of regular steel, galvalume, hot dip galvanized steel (HDGS) and cold rolled steel (CRS). The steel is used for building panels, HVAC systems and other hardware. Rolls of steel are received in bulk by truck and rail. The rolls of steel are first loaded on a spindle and then un-rolled by feeding it through a computer monitored steel and rubber roller system.

The steel is then rolled through a 9-stage continuous cleaning and coating process. The 9-stage cleaning and coating process is operated by an automated sprayer system. The cleaning and coating process consists of stage 1-a caustic cleaner; stage 2- a hot water rinse; stage 3- a caustic cleaner; stage 4-a brush unit; stage 5-a caustic cleaner; stage 6-a hot water rinse; stage 7-a hot water rinse; stage 8-titanium/zinc coating; and stage 9-a hot water rinse.

The steel is first cleaned with an alkaline cleaner solution and rinsed with water. The steel is then cleaned again with a caustic solution and rinsed. The steel is then brushed to remove any excess or residual caustic material. The steel is then cleaned in another caustic solution and rinsed with water in a two-stage rinse system. The steel is then chemically coated with a water-based titanium/zinc solution for corrosion resistance and to promote the bonding of the paint to the steel. The titanium/zinc coating is applied on the steel by a roller system, then heated in an oven to drive off the water, bonding the coating to the steel. The titanium/zinc coated steel is then heat treated in an oven. The steel is then painted with a primer and then with a final-colored topcoat. The painted steel is dried in an oven after each paint application. The steel is then quenched with water, recoiled, and stored prior to shipping.

The HDGS and CRS is processed by immersing the steel into a tank of zinc or iron phosphate for corrosion resistance and rinsed.

During the April 20, 2016 EPA inspection, the chemical coater line (chromium conversion coating process) was not used on a regular basis and was being deactivated/ decommissioned. This process was not in use at the time of this inspection.

10) Previous Inspection History

MC was last inspected by the EPA and MDEQ on April 20, 2016. The preliminary inspection observations appeared to find the facility was storing hazardous waste in containers for more than 90-days, did not label or mark containers with the words hazardous waste, did not keep containers closed, did not date containers, did not maintain container aisle space in the central accumulation area, did not date and keep a container closed in the wastewater pretreatment, did not label or mark a satellite container with the words hazardous waste or other words, stored hazardous waste in a tank for more than 90-days, did not use appropriate controls and practices to prevent spill and overflows from a tank, did not remove a tank system or secondary containment system immediately from services when there was a leak or spill, did not remove the hazardous waste from the tank, did not determine for each piece of equipment whether the equipment contains or contacts a hazardous waste with organic concentration that equals or exceeds 10 percent by weight, did not mark each piece of equipment in such a manner that it can be distinguished readily from other pieces of equipment, did not control air pollutant emissions from the tank, did not list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, did not make arrangements with the local authorities, did not inspect areas where containers are stored weekly looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

MDEQ issued the facility a Notice of Violation in response to the issues observed during the inspection. The issues were resolved by an Agreed Order on February 21, 2017.

11) Findings

The information in this RCRA inspection report is based on the EPA's October 19, 2021, RCRA CEI.

Core Room/Laboratory

Samples from the chemical process are tested for the quality control conditions in an adjoining laboratory. Inspectors observed a 55-gallon satellite accumulation area (SAA) container outside the laboratory accumulating waste toluene and MEK from testing the samples. The container was closed, in good condition, labeled with the words hazardous waste and marked with the date June 13, 2021. The container was not marked or labeled with an indication of the hazard of the contents (Photograph 1). The facility marked the container with the word "ignitable", prior to inspectors leaving this area (Photograph 2). Mr. Fero explained, based on the RCRA CEI conducted in 2016, they thought containers were required to be dated as soon as hazardous waste was accumulated in the container. The inspectors discussed the regulatory issue with Mr. Fero and Mr. Thornburg and was reviewed during the closing conference.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard

statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Primer Paint Coater Area
Paint primer is applied to the steel in this area. Waste paint related material is accumulated in 55-gallon SAA containers. The facility again explained, they thought SAA containers were required to be dated at the point of accumulation. Inspectors observed a 55-gallon container accumulating waste paint and solvent contaminated rags. The container was closed, in good condition, labeled with the words hazardous waste (D001, D007, F003, F005), labeled with a hazard indicator and marked with the date October 19, 2021. Inspectors also observed a 55-gallon container accumulating waste paint and solvent. The container was closed, in good condition, labeled with the words hazardous waste (D001, D007, F003, F005) and labeled with a hazard indicator. This container was not dated. The paint coating rooms are supplied with CO2 suppression for fire retardant. The rest of the facility is covered by overhead sprinklers with fire extinguishers also located throughout the facility.

Finish Paint Coater #1
The final paint coat is applied in this area. Waste paint related material is accumulated in 55-gallon SAA containers. Inspectors observed a 55-gallon container accumulating waste paint and solvent contaminated rags. The container was closed, in good condition, labeled with the words hazardous waste (D001, D007, F003, F005), labeled with a hazard indicator and marked with the date October 18, 2021 (Photograph 3). Inspectors also observed a 55-gallon container accumulating waste paint and solvent. The container was closed, in good condition, labeled with the words hazardous waste (D001, D007, F003, F005), labeled with a hazard indicator and marked with the date October 19, 2021 (Photograph 4).

Finish Paint Coater #2
The final paint coat is applied in this area. Waste paint related material is accumulated in 55-gallon SAA containers. Inspectors observed a 55-gallon container accumulating waste paint and solvent contaminated rags. The container was closed, in good condition, labeled with the words hazardous waste (D001, D007, F003, F005), labeled with a hazard indicator and marked with the date October 18, 2021. Inspectors also observed a 55-gallon container accumulating waste paint and solvent. The container was closed, in good condition, labeled with the words hazardous waste (D001, D007, F003, F005), labeled with a hazard indicator and marked with the date October 19, 2021.

Roller Grinder Room
The rubber rollers removed from the process for maintenance are inspected and grinded to create a smooth surface. Wastewater generated from the rubber grinding operation is discharged to wastewater pretreatment (WWPT). Inspectors observed a 55-gallon SAA container on the concrete floor accumulating waste rags contaminated with MEK. The container was closed, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with the date October 15, 2021.

Inspectors observed the 55-gallon container was surrounded by an apparent condensate release

from nearby equipment. The bottom of the container appeared to be rusted. The inspectors observed no apparent release of hazardous waste from the container (Photographs 5, 6, and 7). The facility transferred the hazardous waste to a new container and moved the container to a dry concrete floor prior to the completion of this inspection.

90-Day or Less Accumulation Area

The 90-day or less accumulation area (90-Day Area) is located inside the main building in the number three paint room. This is a separate room from other building operations. The walls and floor are constructed of concrete.

The facility accumulates hazardous waste in 55-gallon containers in designated rows. The rows are identified with a sign attached to the wall, describing the row numerically or with words describing the type of hazardous waste accumulating in the containers. The containers are accumulated on the concrete floor and stacked two containers high without the use of pallets.

Waste Rag Row

Inspectors observed 33 55-gallon containers in rows stacked two high. The containers were accumulating waste rags contaminated with solvent (MEK and toluene). The containers were closed, in good condition with aisle space, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with dates in September or October 2021 (Photographs 8 and 9).

Recycling Solvent Row

Inspectors observed four 55-gallon containers in this area. The containers were accumulating waste lacquer thinner (MEK and xylene). The containers were closed, in good condition with aisle space, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with dates in October 2021 (Photograph 10).

Row 346

Inspectors observed 44 55-gallon containers in rows stacked two high. The containers were accumulating waste lacquer thinner (MEK and xylene). The containers were closed, in good condition with aisle space, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with dates in August, September or October 2021 (Photograph 11).

Row 347

Inspectors observed 44 55-gallon containers in rows stacked two high. The containers were accumulating waste lacquer thinner (MEK and xylene). The containers were closed, in good condition with aisle space, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with dates in August, September or October 2021 (Photograph 12). Inspectors observed three 55-gallon containers were not marked with the year. The facility marked the year 2021 on the three containers, prior to leaving this area.

Aerosols and Small Paint Can Area

Inspectors observed five 55-gallon containers in this area. The containers were accumulating non-punctured waste aerosol paint cans. The containers were closed, in good condition with aisle space, labeled with the words hazardous waste and labeled with a hazard indicator (Photograph 15). Inspectors observed four 55-gallon containers were marked with dates in October 2021 and

one 55-gallon container of hazardous waste was marked with the date April 19, 2021 (Photographs 13 and 14).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(b)], an LQG who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of MHWMR, 11 Miss. Admin. Code Pt. 3, R. 1.1-1.20, 1.23, and 1.24 [40 C.F.R. Parts 124, 264 through 268 and Part 270].

Inspectors also observed two 55-gallon containers accumulating hazardous waste. The containers were closed, in good condition with aisle space, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with the date September 22, 2021 and October 19, 2021 (Photograph 16).

Universal Waste Accumulation Area

Universal waste is accumulated in the 90-Day Area near the room's rear overhead door. Inspectors observed two four-foot boxes accumulating fluorescent lamps and two small boxes accumulating incandescent bulbs. The containers were closed, in good condition, labeled with the words universal waste and marked with dates in August or September 2021. Inspectors observed a 55-gallon container accumulating mercury sodium bulbs. The container was closed, in good condition, labeled with the words universal waste and marked with the date June 21, 2021.

Inspectors also observed a 55-gallon container accumulating crushed mercury fluorescent lamps. The container was closed, in good condition with aisle space, labeled with the words hazardous waste and marked with date September 21, 2021. The inspectors observed the container was not marked or labeled with a hazard indicator (Photograph 17). The facility marked the container with the word "toxic", prior to inspectors leaving this area.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Solvent Storage Room

The Solvent Storage Room is located inside the main building in a separate room from other building operations. Inspectors accessed this area by walking up a staircase, entering through a locked door and down a staircase into the room. The walls and floor of the room are constructed of concrete and a floor level concrete sump covered by a metal grate was observed. The inspectors observed two vertical tanks. Each tank is positioned next to the concrete wall and mounted on a concrete pad. One 10,000-gallon tank is for the storage of raw solvent product. The second tank was previously operated as a 90-day or less accumulation tank. Mr. Thornburg

and Mr. Fero indicated hazardous waste is not accumulated in the tank and it was closed in 2016. Inspectors observed the tank was labeled as "EMPTY DATE: 12/17/2016, FORMALLY CONTAINING" (Photographs 18 and 19). The inspectors observed the concrete floor and floor-level sump appeared dry (Photographs 20 and 21).

Wastewater Pretreatment (WWPT)

Wastewater generated from the cleaning and coating process, wastewater from the quench process and wastewater from the grinding process is pretreated in WWPT. Wastewater is accumulated initially in three holding tanks, before it is processed in a stage one reduction tank to reduce the hexavalent chromium to trivalent chromium. In stage two, the chromium reduction process is monitored. In stage three, the wastewater is treated in a tank separator to remove oil. In stage four, the wastewater is treated with lime in a tank and polymer is added to promote flocculation, prior to clarification. The wastewater is next processed in a clarifier for solids separation. The solids are pumped from the bottom of the clarifier to a thickening tank. The wastewater is pH adjusted in a separate tank and held for cooling in a holding tank before it is discharged to the municipal sewer system covered under a NPDES permit. The thickened solids are pumped to a filter press and further processed in a dryer generating a waste filter cake. The waste filter cake is accumulated in a one cubic yard container as hazardous waste (F006). The waste filter cake is transferred to a 30-cubic yard container located outdoors. The inspectors observed hazardous waste filter cake was not accumulating in the WWPT area at the time of this inspection.

The inspectors observed nine 250-gallon totes in this area accumulating corrosive wastewater (potassium hydroxide) generated from the WWPT. The totes were closed, in good condition with aisle space, labeled with the words hazardous waste, labeled with a hazard indicator, and all marked with the date October 6, 2021.

30-Cubic Yard Roll-Off Container

The container is located outdoors next to a loading dock. The facility accumulates hazardous waste filter cake (F006) generated from the WWPT. The inspectors observed the container was closed, labeled with the words hazardous waste, and marked with the date October 3, 2021. The inspectors observed the container was not marked or labeled with a hazard indicator (Photograph 22). The facility marked the container with an indication of the hazards of the content, prior to the completion of this inspection.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Splitter Area
Unrolled raw steel is split into specific widths specified by the customer. A small part washer is used in this area to clean equipment. The inspectors observed a 55-gallon SAA container accumulating waste rags contaminated with solvent (MEK). The container was closed, in good condition, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with the date September 23, 2021.

12) Waste Management Practices

Hazardous waste generated by the facility consists of waste paint and solvent, waste paint debris/rags and WWPT filter cake. Hazardous waste is accumulated in 55-gallon SAA containers at or near locations where the hazardous waste is generated and transferred to the 90-day or less accumulation area when full. Wastewater from the chemical cleaning and coating process is discharged to WWPT. Wastewater from the quench process and grinding process is discharged to WWPT. The facility generates universal waste lamps and batteries.

The facility manages the hazardous waste in SAA and 90-Day accumulation areas located throughout the facility and prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to a treatment, storage, or disposal facility (TSDF).

Metal Coaters used the following transporters in 2018 through 2021.
Research Solutions Group, Inc. – ALD072095169
Superior Transportation Logistics, LLC – MOR000548404
Superior Transportation Logistics, LLC – INR000104224
Heritage Transport, Inc. – IND058484114
Freehold Cartage, Inc. – NJD054126164
Safety Kleen Systems, Inc. – TXR000081205
Clean Harbors Environmental Services, LLC – MAD039322250
United Environmental Services – LAR000029413
Frac N Vac – IND000000000
Frac N Vac – ARR000021659
Tri-State Motor Transit, Inc – MOD095038998

Metal Coaters used the following TSDF in 2018 through 2021.
Clean Earth Alabama, Inc. – ALD981020894
Reclaimed Energy – IND000780403
Rineco – ARD981057870
Safety Kleen Systems, Inc. – MSD000776765
EQ Alabama, Inc. – ALD983177015
Clean Harbors LaPorte – TXD982290140
US Ecology Sulligent, Inc. – ALD983177015

13) Record Review

RCRA Site Identification Form
The inspectors reviewed the facility's 2020 and 2021 notification of its regulated waste activity.

Hazardous Waste Manifest Records
The EPA inspector reviewed hazardous waste manifests for 2018 and 2019 and the MDEQ inspectors reviewed the manifests for 2016, 2017, 2020 and 2021. Four hazardous waste manifests were reviewed from the EPA's E-Manifest Record System, from August 19, 2021 to August 30, 2021.

Universal Waste Records
The inspectors reviewed the manifests for shipments of universal waste.

Waste Determination/Waste Profile
The inspectors reviewed waste determination records consisting of waste profile and laboratory analysis report for the WWPT filter cake. A sample of the WWPT filter cake was analyzed for chromium in October 2021. The laboratory report indicated a concentration level of 2.32 mg/L of chromium.

Solvent Storage Tank
The inspectors reviewed the Solvent Storage Tank decontamination proposal by Rineco Environmental Services (Rineco) for the removal of hazardous waste and cleaning of the tank. MC provided an email record indicating that Rineco removed the hazardous waste and cleaned the tank on December 16, 2016.

Contingency Plan
The inspectors reviewed the contingency plan (Plan). The inspectors observed the Plan did not have a list identifying the emergency and spill control equipment and a description of the equipment's capability.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.261(e)], and is a condition of the LQG Permit Exemption, the plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Quick Reference Guide
The inspectors reviewed the Quick Reference Guide (QRG). The inspectors observed the QRG did not include the locations of the water supply and the water flow rate.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.262(b)(6)], and is a

condition of the LQG Permit Exemption, the locations of water supply (e.g., fire hydrant and its flow rate).

Arrangements with Local Authorities
The inspectors reviewed the arrangements with the local authorities. The inspectors observed it appeared the arrangement with the hospital, with State and local emergency response teams and as appropriate, the Local Emergency Planning Committee were not made.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.256(a)], and is a condition of the LQG Permit Exemption, the large quantity 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.

Weekly Container Inspection Records
The inspectors reviewed weekly container inspection records from December 27, 2016 to October 7, 2021. The inspectors observed the container inspection for the weeks between January 2, 2020 and January 21, 2020, between January 21, 2020 and February 4, 2020, between February 4, 2020 and February 18, 2020, between February 18, 2020 and March 30, 2020, between April 8, 2020 and May 27, 2020, and for the month of December 2020 appear not to have been conducted or the weekly inspection not documented.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(v)], and is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Personnel Training
The inspectors reviewed the RCRA training records.

Annual Report
The inspectors reviewed the annual reports for 2018 through 2020.

Waste Minimization Plan
The inspectors reviewed the waste minimization plans for 2018 through 2020.

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

14) Closing Conference

Upon conclusion of the inspection, a closing conference was conducted in the presence of Metal Coaters representatives. Mr. Todd Harbour and Mr. Rob Wallace attended the closing conference

by phone. The inspectors informed the facility of their preliminary conclusions at the time of the inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion

Based on the CEI conducted on October 19, 2021, Metal Coaters, was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

17) Signed

WILLIAM KAPPLER Digitally signed by WILLIAM KAPPLER
Date: 2021.12.10 13:54:59 -05'00'

_____ _____

William Kappler Date
Physical Scientist
RCRA Enforcement Section

18) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2021.12.10 14:05:29 -05'00'

_____ _____

Araceli B. Chavez Date
Chief
RCRA Enforcement Section

Metal Coaters
MSD985980481
October 19, 2021
RCRA CEI Photographs
Photographs by William Kappler
Camera Model: Samsung WB250F
Property Tag #: S75917

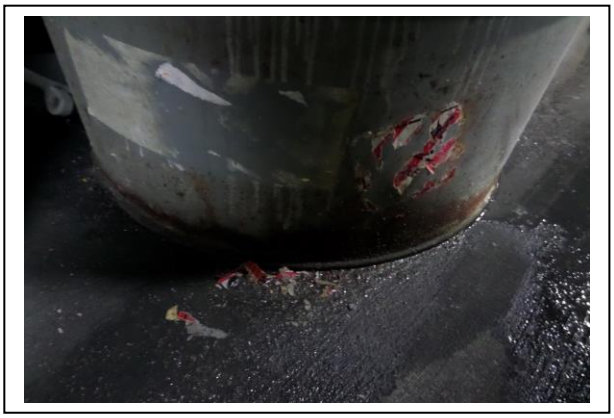
Metal Coaters. Core Room/Laboratory. The container was not marked or labeled with a hazard indicator. Photograph 1 taken at 10:58 a.m.

Metal Coaters. Core Room/Laboratory. The container was not marked or labeled with a hazard indicator. Photograph 2 taken at 10:58 a.m.

Metal Coaters. Finish Paint Coater #1. Waste rags and paint dated 10/18/21. Photograph 3 taken at 11:12 a.m.

Metal Coaters. Finish Paint Coater #1. Waste paint and solvent dated 10/19/21. Photograph 4 taken at 11:12 a.m.

Metal Coaters. Rolle Grind Room. Rusted container dated 10/5/21. Transferred contents to a new container. Photograph 5 taken at 11:18 a.m.



Metal Coaters. Rolle Grind Room. Rusted container dated 10/5/21. Transferred contents to a new container. Photograph 6 taken at 11:18 a.m.

Metal Coaters. Rolle Grind Room. Rusted container dated 10/5/21. Transferred contents to a new container. Photograph 7 taken at 11:18 a.m.

Metal Coaters. Paint 90-Day or Less Accumulation Area (Paint 90-Day). Waste rags row. Photograph 8 taken at 11:30 a.m.

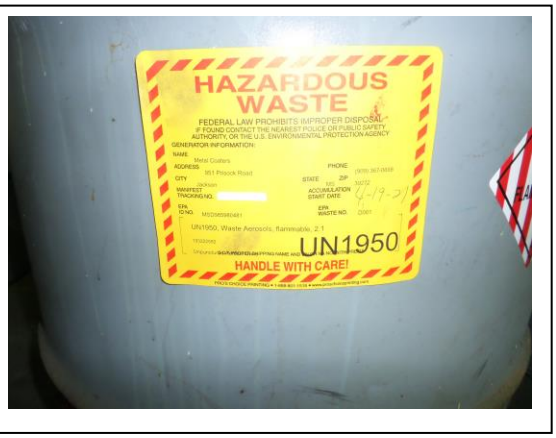
Metal Coaters. Paint 90-Day. Waste rags row. Photograph 9 taken at 11:30 a.m.

Metal Coaters. Paint 90-Day. Recycle solvent row. Photograph 10 taken at 11:42 a.m.

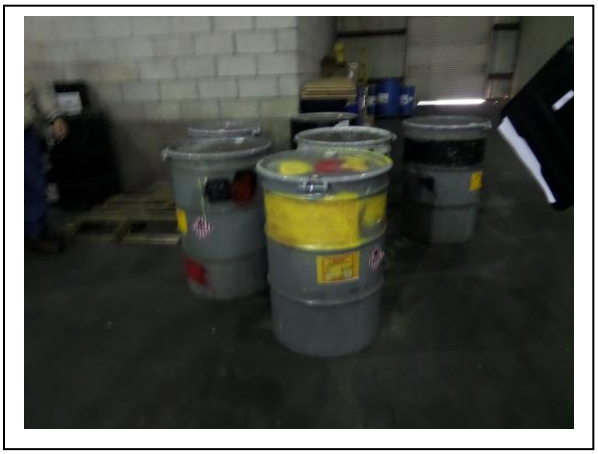
Metal Coaters. Paint 90-Day. Row 346. Photograph 11 taken at 11:43 a.m.

Metal Coaters. Paint 90-Day. Row 347. The facility marked three 55-gallon containers with the year 2021. Photograph 12 taken at 11:43 a.m.

Metal Coaters. Aerosols and Small Paint Can Area. The inspectors observed the container's labeled marked with the date 4/13/21. Photograph 13 taken at 11:52 a.m.



Metal Coaters. Aerosols and Small Paint Can Area. The inspectors observed the container's labeled marked with the date 4/13/21. Photograph 14 taken at 11:52 a.m.



Metal Coaters. Aerosols and Small Paint Can Area. The inspectors observed five 55-gallon container accumulating hazardous waste. Photograph 15 taken at 11:52 a.m.

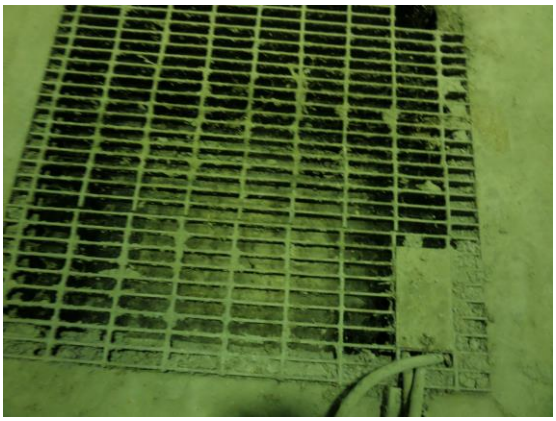
Metal Coaters. Aerosols and Small Paint Can Area. The inspectors also observed two 55-gallon container accumulating hazardous waste. Photograph 16 taken at 11:54 a.m.

Metal Coaters. Universal Waste Accumulation Area. Inspectors observed a 55-gallon container accumulating hazardous waste crushed lamps with no hazard indicator. Photograph 17 taken at 12:01 p.m.

Metal Coaters. Solvent Storage Room. 90-day accumulation tank. Inspectors observed the tank labeled empty on 12/17/16. Photograph 18 taken at 12:08 p.m.

Metal Coaters. Solvent Storage Room. 90-day accumulation tank. Inspectors observed the tank labeled empty on 12/17/16. Photograph 19 taken at 12:08 p.m.

Metal Coaters. Solvent Storage Room. Inspectors observed floor level concrete sump. Photograph 20 taken at 12:08 p.m.



Metal Coaters. Solvent Storage Room. Inspectors observed floor level concrete sump. Photograph 21 taken at 12:09 p.m.

Metal Coaters. WWPT Outdoor 30 Cubic Yard Container. Facility marked a hazard indictor on the container. Photograph 22 taken at 12:28 p.m.