

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

SSAB Alabama Inc. (SSAB)
12400 Highway 43, N
Axis, Alabama 36505
Mobile County

EPA ID#: ALR000014183
NAICS #: 331110 - Iron and Steel Mills and
Ferroalloy Manufacturing; 332811 - Metal
Heat Treating

3) Responsible Officials

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4) Inspection Participants

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Terry Brooks, Env. Specialist, SSAB

Lanny Sasser, ADEM
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5) Date of Inspection

Thursday, November 21, 2024, 9:53 AM CST

6) Applicable Regulations¹

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.

Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005 (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; Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code § 22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

Pursuant to ADEM Admin. Code r. 335 14-1-.02-(1)(a)111 [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 ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near 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 22-30-12(b) of the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7 and 8 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin Code r.335-14-2-.01(4)(a)(23) [40 C.F.R. § 261.4(a)(23)], a hazardous secondary material (HSM) that is generated and legitimately reclaimed within the United States or its territories and under the control of the generator is not a solid waste, provided that the conditions listed in ADEM Admin Code r.335-14-2-.01(4)(a)(23) [40 C.F.R. § 261.4(a)(23)(i) and (ii)] (hereinafter referred to as the “HSM Generator Controlled Exclusion”) are met.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(a)(a)244 [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 ADEM Admin. Code r. 335-14-17 [40 C.F.R. § 279.1], a used oil generator means any person, by site, whose act or process produces used oil or whose act first causes used oil to be subject to regulation.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine SSAB Alabama Inc. compliance with the applicable requirements of RCRA and the corresponding ADEM regulations. This was an EPA lead inspection and was conducted jointly with a representative of ADEM.

8) Facility Description

In 1998 IPSCO Inc. began construction of a steel mini-mill at the site with a twin-shell, triple electrode, electric- arc furnace (EAF) and twin single electrode, ladle metallurgy furnaces (LMFs). In 2001, the mini mill began production of discrete plate and coiled hot rolled plate steel. In 2007, a one hundred-thousand-ton quench line for the production of Hardox® and Weldox® (specialty steels) was added to the facility. In 2008, SSAB Swedish Steel AB (headquarters in Stockholm, Sweden) purchased IPSCO Inc. including this facility, SSAB Alabama Inc. SSAB Alabama Inc. shall be referred to as "SSAB" or "facility" hereinafter. SSAB recently added a 300-thousand-ton capacity quench line for specialty steel production at this facility. SSAB currently has approximately 560 SSAB and 340 contractor employees working in four shifts, twenty-four hours a day, seven days a week at the subject facility; roughly twenty-five of those employees work directly or indirectly managing hazardous waste.

Scrap steel (main feedstock) and secondary materials are received from an on-site scrap yard operated by Tube City, IMS and are loaded (charged) by overhead crane into either the EAF's east or west shell. The charge is preheated (natural gas) in one shell while the triple arc electrode melts the pre-heated scrap steel in the other shell. The EAF electrode pivots from the east to the west shell on a continuous cycle. After the scrap steel has melted, it is tapped into ladles and taken by a shot rail or by overhead crane to one of the two LMFs. In the LMFs, alloying elements are added; the carbon content is adjusted; the sulfur level is reduced; and the steel is sampled. After leaving the LMFs, the molten steels are taken either to the single strand caster (caster) or to one of the twin vacuum tank degassers (VTDs) and then to the caster. The caster shapes and cuts the steel into thin slabs. Some of the slabs of metal are reheated and rolled onto spools in the reheat furnace and rolling mill. In the VTDs, a vacuum is pulled on the vessel of molten steel to remove all of the air and argon gas is added, to remove impurities, while the molten steel is stirred. The steel slabs from the VTD process are taken to one or the other of the two specialty steel quench lines.

Emissions from the electric arc furnace are controlled by a baghouse system. The baghouse dust is accumulated in an on-site storage silo until it is shipped by rail to Steel Dust Recycling for metals recovery. The baghouse dust is stored in four central accumulation areas (CAAs). Other hazardous wastes generated on-site are accumulated in two CAAs. The on-site solid and hazardous waste management vacuum services are performed by Ranger Environmental; hazardous wastes are transported by Greer Enterprises (container drums) or Ranger (roll-off containers). In an on-site garage and yard area, Tesco performs maintenance on the facility's vehicles and equipment. Used oil generated is stored in an on-site used oil storage tank and is collected and transported by Aaron Oil Company, Inc. to its Mobile facility. Spent fluorescent bulbs are handled as universal waste.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, dated November 2024 and Biennial Report dated January 2024) SSAB identified itself as a large quantity generator of hazardous waste, as a small quantity handler of universal waste and as a used oil generator. The hazardous waste codes for the waste generator include D001, D002, D009, D035, F003, F005, and K061. The quantity of hazardous waste shipped in CY2024 from January to October is approximately 378,032,294 kilograms (kg) (416,709 US tons) and in CY2023, it exceeded over 176,000,000 kg (194,007 US tons).

9) Previous Inspection History

ADEM has conducted two RCRA CEIs at the subject facility between 2016 and 2024.

SSAB was last inspected by ADEM in 2021. There were no violations observed during the inspection.

ADEM's previous inspection was conducted in 2016 and there were two findings related to labeling and signage. The facility returned to compliance in October of 2016.

10) Opening Conference

On November 21, 2024, EPA inspectors Devon Robinson, Laurie Benton DiGaetano, and Alexis Wilson, accompanied by ADEM inspector Lanny Sasser, arrived at SSAB Alabama Inc. at approximately 9:53 AM. Tony Cooper, Senior Environmental Manager, Brian Austin, Environmental Coordinator, and Terry Brooks, Environmental Specialist, immediately received the inspectors and attended the opening conference. The inspectors introduced themselves, showed their credentials to Tony Cooper, Brian Austin, and Terry Brooks. The purpose of the visit was explained to all attendees of the opening conference.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. 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. The EPA inspector, Devon Robinson, explained that the EPA has an information sheet for small businesses. This sheet can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector, Devon Robinson, also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim. The inspectors, Devon Robinson and Lanny Sasser, requested standard facility RCRA records for review after the facility tour.

Tony Cooper and Brian Austin 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 representatives, Tony Cooper and Brian Austin, led the inspectors on a tour of the facility operations. Terry Brooks gathered the requested facility records and documentation while the tour commenced.

11) Inspection Observations

VTD Storage Area:

The inspection tour of the facility began in the Vacuum Tank Degasser (VTD) Storage Area. This area is located in the center of the property and is generally identified as the central accumulation area (CAA) #6, also referred to as the VTD Storage area to accumulate dust associated with the VTD operations. CAA #6 consisted of two areas adjacent to one another. One portion of the CAA included three hazardous waste tanks, and the other portion included one hazardous waste container. SSAB has determined that this dust is with a characteristic hazardous waste due to the presence of lead (D008) and, per the most recent Contingency Plan, also cadmium (D006). Three of the tanks were located together in one area and the container, a smaller collection hopper, was located across the room. The two CAA areas were clearly marked with signage and were chained off to protect from foot traffic. Two tanks and one container were observed to be open. One tank was observed with the lid propped open, one tank with a hole in the intake pipe releasing dust (Photos 1-2), and the hopper was constructed as an open-air purge system and was observed to have piles of dust along the top of the container and on the floor (Photos 3-4). The inspectors recommended that the open-air purge system be enclosed and sealed. Neither the three tanks nor the hopper had way to determine how full each was.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 335-14-3-.14(2) [40 C.F.R. § 262.251] and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Pursuant to ADEM Admin. Code r. 335-14-3-.01 (7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-3-.01 [40 C.F.R. Part 265.194(b)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems must use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems.

The inspectors observed that each of the tanks and container were labeled with an accumulation start date and with the words "Hazardous Waste". However, the inspectors observed that neither the three tanks nor the one hopper was marked with an indication that its contents exhibit the D008/D006 hazardous waste characteristic of toxicity, and no EPA waste codes were visible. Before leaving the area, the facility marked each hazardous waste label with the word "toxic" and with the "D008" EPA waste code. Facility personnel also made repairs to the leaking intake pipe for one tank during the inspection and immediately closed the lid on the other open tank.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(i)(II) and (IV) [40 C.F.R. § 265.17(a)(5)(i)], 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 its contents; and all appropriate EPA hazardous waste numbers associated with the hazardous waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(ii)(II) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with an indication of the hazards of the contents.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(v) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and a container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

All surfaces in this area were observed to be covered in a layer of dust and visible dust particles were observed in the air (Photo 5). The tanks are in close proximity to a bay door that opens to the environment and this door was observed to be open. Facility personnel explained that the dust that was observed in this area is vacuumed out during down hours at a frequency of once a week, and that the material accumulated using the vacuum exhibits the hazardous waste characteristic of toxicity due to elevated levels of cadmium (D006) and lead (D008). SSAB has characterized the dust that is routinely removed from this area as K061 hazardous waste EAF dust. Please clarify the EPA waste codes for this waste. SSAB is required to make an accurate waste determination for this waste stream.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [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 ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

Hot Metal Bay – Caster Building:

The inspectors identified two used oil 55-gallon containers. Both of these containers were on top of spill pallets, label with the words “used oil”, and in good condition (Photo 6). One container was currently being filled by an attached hose. No concerns were noted by the inspectors in this area.

QA/QC Lab:

The facility manages a SAA in the QA/QC Lab area for managing hazardous waste magnesium perchlorate generated by the lab as reagent waste. This waste was observed to be in one 5-gallon bucket with the lid secured. The bucket was in good condition and marked with the words “Hazardous Waste” and the D001 EPA waste code for a flammability characteristic (Photo 7). The container was also marked with a DOT oxidizer hazard label.

EAF Baghouse:

In the EAF Baghouse area, the inspectors observed five containers, which were unlabeled. These were observed to be in good condition but looked to have been sitting for a long period of time (Photo 8). Facility personnel stated that the containers held metal, which will be recycled on-site in the EAF.

SAAB identified one designated SAA for managing aerosol can paint waste liquid; and the inspectors observed one 55-gallon container in this SAA. This container was marked "Aerosol Depressurization Unit", it had a label with the words "Hazardous Waste" with the EPA waste codes D001, D035, F003, and a DOT flammable hazard sticker (Photo 9). Pursuant to ADEM Admin. Code r. 335-14-2-.03(5)(b) [40 C.F.R. § 261.24(b)], D035 hazardous waste is a solid waste exhibiting the characteristic of toxicity for MEK, but the container was not marked with an indication that its contents exhibit the hazardous waste characteristic of toxicity. The inspectors also observed that the container had spilled liquid on the top but was closed and in good condition. This container also had a sufficient secondary containment spill pallet. One 55-gallon container contained punctured used cans and facility personnel noted that they would be sent out with the municipal plant trash or recycled. Regulations require the punctured cans to be recycled. Pursuant to ADEM Admin. Code r. 335-14-11-.02(4)(e)4. [40 C.F.R. § 273.13(e)(4)].

The inspectors observed two open top trash cans containing used PPE and debris in a second SAA at the EAF Baghouse area. Facility personnel stated that the PPE and debris were contaminated with K061 dust and will be transferred to the compactor unit before being shipped off-site as hazardous waste. The trash cans were not labeled with the words "Hazardous Waste" or with an identification of the hazards of their contents; they were not equipped with a lid to close the container (Photo 10). Although the total capacity of these trash cans exceeds 55-gallon limit set forth by the SAA Permit Exemption, it appeared that the volume of waste managed in the containers at the time of the inspection was less than 55 gallons.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4. [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 ADEM Admin. Code r. 335-14-3-.01(5)(a)5.(ii) [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 with an indication of the hazards of the contents.

On the east exterior of the baghouse, the inspectors observed a contractor truck with a large vacuum hose intended to vacuum up the K061 dust and prepare it for hauling off-site. This vacuum hose was attached to a vacuum box designated as a CAA container. The container was labeled with the words "Hazardous Waste", with the EPA waste code K061, with an

accumulation start date of November 1, 2024, and with the phrase “contains hazardous or toxic waste” (Photos 11-12).

Compactor Box East of the Baghouse:

The compactor box, located outside of the EAF Baghouse is identified as CAA #3. The compactor box is utilized for the accumulation and compaction of hazardous waste debris and PPE contaminated with K061 dust. The compactor was observed by the inspectors to be in good condition, labeled with the words “Hazardous Waste”, identified with the EPA waste code K061, marked with an accumulation start date of September 30, 2024, and labeled with the phrase “contains hazardous or toxic waste” (Photos 13-14). This area was observed to be marked with a chain and sign with the words “Danger”.

East of Baghouse – Storage Pad:

An outdoor CAA storage pad located east of the baghouse is identified as CAA #2. This CAA is designated for the storage of 25 cubic yard vacuum storage boxes (vac boxes) and 30-yard roll-off dumpsters with EAF baghouse dust and contaminated debris. The inspectors observed a total of five containers, including two vac boxes and three 30-yard roll-offs. Each container was observed to be in good condition, labeled with the words “Hazardous Waste”, marked with the EPA waste code K061, marked with an accumulation start date of October 14, 2024, and labeled with the phrase “contains hazardous or toxic waste” (Photos 15-16). The 30-yard roll off containers were tarped securely at the top. This area was observed to be marked with a chain and sign with the words “Danger”.

Roll Shop:

The Rolling Mill and Roll Shop production area is located mid property, south of the Reheat Furnace. The facility manages ‘non-empty’ aerosol cans in the Roll Shop as universal waste. The inspectors observed that the aerosol cans were stored in a 55-gallon container with a purple universal waste sticker. The label was dated October 17, 2024, and marked with an ‘X’ to indicate that contained non-empty aerosol cans. The container was on top of a secondary containment spill pallet and had a metal lid that was closed and secured (Photo 17).

Finishing Department:

In the Finishing department area, the facility uses ink stenciling for steel slab identification and primer coatings as part of the manufacturing process. This procedure includes purging spent paint from the paint lines and equipment with virgin alcohol or MEK solvent. When the lines are flushed with solvent, the spent solvent is collected through a drip tray into a 55-gallon container, which is attached below the drip tray. The inspectors did not observe any labels on this 55-gallon container, which was open. The inspectors observed uncontained paint solvent waste that had leaked/spilled from the collection pan and covered most of the outside of the container and onto the surrounding floor (Photos 20-21). The facility claims that the waste generated in this process is a hazardous secondary material (HSM) that is excluded from the definition of solid waste under the HSM Generator Controlled Exclusion. However, the

uncontained paint solvent waste does not appear to meet the condition for exclusion set forth in ADEM Admin Code r.335-14-2-.01(4)(a)(23) [40 C.F.R. § 261.4(a)(23)(ii)(A)], which states that a HSM must be contained. Therefore, the uncontained paint solvent waste observed on the outside of the container and on the surrounding floor is a solid and hazardous waste that is subject to all applicable RCRA regulations. SSAB had not made a hazardous waste determination for this waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 335-14-3-.14(2) [40 C.F.R. § 262.251] and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [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 ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

The spent solvent mixture is pumped via piping into a 55-gallon container labeled with a DOT flammable sticker and additional stickers with the words “solvent waste holding drum” and “recyclable solvent”. The spent solvent is transferred via a hose into a 16-gallon solvent reclamation unit. The unit has what looks to be a built-in secondary containment sump, but it was not discussed during the inspection. Once processed, the clean solvent is discharged into a clean solvent storage tank before it is reused onsite. The reclamation unit generates hazardous waste still bottoms that are accumulated in a SAA next to the unit. The inspectors observed one 55-gallon container of hazardous waste still bottoms in this SAA. The still bottoms container was observed to have a label with the words “Hazardous Waste” and was closed securely. The container was not marked with an indication that its contents exhibit the hazardous waste characteristic of toxicity or ignitability (Photo 22). Facility personnel added the words “flammable” and “toxic” to the label and applied a DOT flammable sticker.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5.(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

SSAB also manages an SAA for solid paint waste that is generated in the Finishing area. The inspectors observed a 55-gallon container labeled with the words “Hazardous Waste”, “Solvent rags”, EPA waste codes D001, D035, and F003, and a DOT flammable hazard sticker in this SAA (Photo 19). Pursuant to ADEM Admin. Code r. 335-14-2-.03(5)(b) [40 C.F.R. § 261.24(b)], D035 hazardous waste is a solid waste exhibiting the characteristic of toxicity for MEK. However, the container was not marked with an indication that its contents exhibit the hazardous waste characteristic of toxicity. This container was also observed to be open and full.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4. [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 ADEM Admin. Code r. 335-14-3-.01(5)(a)5.(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

The inspectors also observed two 55-gallon containers with non-empty aerosol cans in the Finishing area. The first container had no universal waste label and was not dated. This container was on top of a secondary containment spill pallet and had a metal lid that was closed and secured (Photo 18). Facility personnel immediately added a universal waste label to the container as it was noticed.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(f). [40 C.F.R. § 273.14(f)], a SQHUW must label or mark each Universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol cans are contained, must be labeled, or marked clearly with any of the following phrases: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s)”.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(6)(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

The second container, which was observed near the bay doors on the southside of the finishing department, was identified with a purple universal waste sticker. The label was marked with an accumulation start date and had an ‘X’ marked on a box indicating that it was non-empty aerosol cans.

Quench Line Five (QL5):

The QL5 Heat Treat building is south of the Rolling Mill and adjacent to the shipping warehouse. SSAB has identified two SAAs in this area. The inspectors observed one 55-gallon container for accumulating D001, D035, and F005 hazardous waste paint related material in the first SAA. The container was not labeled with either the words “Hazardous Waste” or with the indication of the hazards of the contents; the small bung on top of the container was open. Facility personnel added labels and closed the container during the inspection. The inspectors observed another 55-gallon container for accumulating hazardous waste paint related material and solvent rags in the second SAA. This container was labeled with the words “Hazardous Waste”, and the container had a DOT flammable sticker.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4. [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 ADEM Admin. Code r. 335-14-3-.01(5)(a)5. [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 with the words “Hazardous Waste” and with an indication of the hazards of the contents.

Oil Storage Building:

The Oil Storage Building is located on the southwestern side of the property and is generally identified as CAA #1. This building is utilized for storage before shipment of a variety of waste with the majority in 55-gallon containers. Signs with the words “no smoking”, “notice hazardous waste 90-day accumulation area”, and “danger” were observed by the inspectors. Security for this building included a keypad, cameras, and alarm. At the entry point for the building, the inspectors observed four 55-gallon containers of hazardous waste. Each container was in good condition, marked with the words “Hazardous Waste,” labeled with a DOT flammable sticker, and marked with an accumulation start date (Photo 23). One container of D001, D035, F005 hazardous waste paint related material was not marked with an indication that its contents exhibit the hazardous waste characteristic of toxicity.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(i)b. [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

The inspectors noted thirty-seven 55-gallon and eight 5-gallon containers with used oil as the majority of the containers in the building, with a few nonregulated corrosives, DOT hazardous materials, and one universal waste container (Photo 24). The one universal waste container was marked ‘non-empty’ aerosol cans. The inspectors observed that the aerosol cans were stored in a 55-gallon container with a purple universal waste sticker. The label was dated October 31, 2024, and had an ‘X’ marked on a box on the label indicating that it was non-empty aerosol cans. The container was on top of a secondary containment spill pallet and had a metal lid that was closed and secured.

Logistics Warehouse:

This warehouse is located adjacent to the Oil Storage Building and the Administrative Building. In addition to storage of parts and packing materials, SSAB also uses this area to crush used lamps and accumulate the crushed material as hazardous waste. The inspectors observed one 55-gallon container in the lamp-crusher area. The container lid was secure, and all components of the lamp-crusher unit appeared to be intact. This container had a label with the words “Hazardous Waste”, “toxic”, and an EPA waste code of D009 for mercury. The inspectors also observed another 55-gallon container, which was closed, labeled with a purple universal waste sticker that had the words “Used Ballasts,” and dated July 31, 2024 (Photo 25).

Roll-off Storage CAA #4:

The EAF Baghouse is attached to a collection silo that stores the K061 baghouse dust and a K061 dust loadout building. The baghouse dust is transferred from the silo in the loadout building (Photo 26). Facility personnel explained the loadout procedures and stated that during loadout, the operation is staffed at all times and the building doors are closed from start to finish. The inspectors noticed a plastic 30-gallon container labeled with a hazardous waste sticker and was located under a SAA sign. This container was identified as a waste container for PPE contaminated with K061 dust. It was in good condition, labeled with the words "Hazardous Waste," marked with an indication that its contents are toxic, and closed (Photo 27). The building also has a vacuum system used for cleaning the area that attaches to vac boxes. The vacuumed dust is stored inside of vac boxes located outside of the loadout area. The inspectors observed two vac boxes in the chained off area identified as CAA #4 (Photo 28). Each vac box was in good condition, marked with an accumulation start date of November 1, 2024, labeled with the words "Hazardous Waste," labeled with the words "contains hazardous or toxic waste", and labeled with the EPA waste code K061 (Photo 28).

Roll-off Storage Pad CAA #5:

Historically, the facility has stored vacuum boxes of EAF baghouse dust and contaminated debris, along with other roll-offs with non-regulated materials, on a roll-off pad located north of the administration building. This area is generally identified as CAA #5. According to facility personnel, this area is no longer typically used for hazardous waste storage. The inspectors confirmed that no containers of hazardous waste were present in this area at the time of the inspection.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated in August 2023.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan describes arrangements agreed to with the Creola Police Department, Saraland Fire and Rescue Department, USA Health University Hospital, Springhill Memorial Hospital, North Baldwin Infirmary, Mobile County Emergency Management Agency, Alabama Emergency Management Agency, and the Alabama Department of Environmental Management (ADEM) Field Operations Division.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Tony Cooper is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Contingency Plan and its quick reference guide was most recently submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee on September 20, 2023.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Hazardous Secondary Material (HSM) Documents:

During the opening conference, the facility stated that SSAB operates and has operated three solvent recovery units since 2021. One recovery unit is located in the Rolling Mill, another in the Blasting/Painting Areas, and the third at the Quench Line 6. Facility personnel stated that these units are used to recover alcohol-based solvent, MEK, methylbenzene (toluene), and/or propanone (acetone). During the inspection, the inspectors observed one solvent recovery unit in the Finishing Department, which is described in the Section 11 of this CEI Report. Facility personnel stated that the other unit(s) have generally the same equipment and set up as the one that was observed during the inspection.

On November 15, 2021, ADEM received SSAB's ADEM Form 8700-12, which included a letter, dated November 12, 2021, and a Schedule A, Certification of Hazardous Waste Management. This form and its attachments document SSAB's initial notification to the ADEM Land Division's Hazardous Waste Program that the facility intended to install and use an onsite solvent recovery unit for the sole purpose of volume reduction. However, SSAB failed to indicate this HSM management activity by marking box D on Section X. Certification of Status of this form and on each subsequent the ADEM 8700-12 Form that was submitted to the ADEM Land Division's Hazardous Waste Program. As a result, the facility's HSM management activities were not identified in the Enforcement and Compliance History Online (ECHO) database.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(8)(d)1. [40 C.F.R. § 262.18(d)(2)] a LQG must submit a correct and complete ADEM Form 8700-12 (including all appropriate attachment pages and fees) reflecting current waste activities to the Department annually. The Department must receive the ADEM Form 8700-12 (including all appropriate attachment

pages and fees) no later than the 15th day of the specified month in the specified month schedule located at 335-14-1-.02(1)(a).

On December 5, 2024, EPA inspector, Devon Robinson, requested via email to Tony Cooper, a copy of documentation for HSM activities including the legitimacy determinations for all solvent recovery systems, the maximum amount generated/accumulated at any one time, emergency preparedness and response for management of hazardous secondary materials, and proof of notifications/arrangements with local authorities. On December 12, 2024, Devon Robinson received records from Brian Austin, Environmental Coordinator, SSAB, documenting the legitimacy determination for recycling spent solvents and the emergency preparedness and response for managing HSM. However, the records did not include provide proof of hazardous secondary material notifications or arrangement with local authorities. Specifically, the Contingency Plan that was submitted to demonstrate emergency response arrangements with local authorities did not include a reference to the HSM management units or activities.

Pursuant to ADEM Admin. Code r. 335-14-2-.13(11)(f)1. [40 C.F.R. § 261.4(a)(23)(ii)(f)(1)(i)] 261.410(f) the hazardous secondary material generator must attempt to make arrangements to familiarize police, fire departments, and emergency response teams with the properties of hazardous secondary material handled at the facility and associated hazards.

Training Records:

The inspectors reviewed training records from the years 2022, 2023, and 2024. Departments and subdepartments of each employee were provided. All employees are given the Environmental Awareness training annually which includes RCRA HW and Contingency Plan. The logs did not provide job titles or descriptions the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records, along with SSAB's internal tracking system, and land disposal restriction forms for shipments of hazardous waste. Hazardous waste manifest records show that K061 EAF Baghouse dust, and D001, D035, F003, F005 and F006 hazardous wastes, are routinely shipped to Steel Dust Recycling, LLC (ALR000042754), Chemical Waste Management, Inc. (K061 materials) (ALD000622464), and Giant Resource Recovery - Attalla, Inc (ALD070513767).

Weekly Inspection Records:

The inspectors reviewed SSAB's available records of inspections of the hazardous waste central accumulation areas (CAA). The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about complete container labels, closed lids and bungs, condition of containers, containers compatible with waste, container storage time, emergency communication, fire extinguisher, and spill response kit. The records

include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection.

The VTD tanks require a daily inspection. Pursuant to ADEM Admin. Code r. 335-14-2-.13(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(6) [40 C.F.R. § 265.195(b)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must conduct daily inspections of the tank. The inspectors reviewed the weekly inspections of container but the daily inspections for each tank were not provided at the time of the CEI inspection. Please provide the documentation of daily tank inspections for each tank.

Biennial Report and 8700-12 Notification:

The inspectors reviewed SSAB's 2023 Biennial Report and ADEM 8700-12 Notifications. The most recent notification (2024) includes state activities: APET, SQHUB, SQHUL, SQHUW, UOG, UOGOG.

13) Closing Conference

The inspectors conducted the exit meeting at 5:40 pm with Tony Cooper, Brian Austin, and Terry Brooks. During this meeting, the inspectors stated their preliminary conclusions of the inspection. SSAB agreed to provide additional records upon request by EPA or ADEM inspectors.

On December 5, 2024, EPA inspector, Devon Robinson, requested via email to Tony Cooper, a copy of the Contingency Plan and Quick Reference Guide (QRG) with proof of submittal to local authorities, RCRA training records for 2022-2023 including job titles and descriptions, CAA weekly inspections (last 4), waste profiles for all hazardous waste streams, a map showing the location of the hazardous waste areas (SAAs and CAAs) with identification labels, documentation for Hazardous Secondary Materials (HSM) (including: legitimacy determinations for all solvent recovery systems, maximum amount generated/accumulated at any one time, emergency preparedness and response for management of hazardous secondary materials, and proof of notifications/arrangements with local authorities), list of acids (pickle liquor) used and a description of what happens to the waste generated from this process, most recent integrity assessment and available inspection logs (2022-2024) of the silo used to store EAF baghouse dust (K061), and the current Stormwater Pollution Prevention Plan to be submitted by close of business Thursday, December 12, 2024.

In an email to Devon Robinson dated Thursday, December 12, 2024, Brian Austin provided records or explanations in response to Devon Robinson's request.

14) Summary of Observations

Based on the observations made during the inspection, SSAB Alabama Inc. was apparently deficient with the following RCRA requirements:

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(i) [40 C.F.R. § 265.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of its contents; the date upon which each period of accumulation begins clearly visible for inspection on each container; and all appropriate EPA hazardous waste numbers associated with the hazardous waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(ii)(II) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words “Hazardous Waste”; and an indication of the hazards of the contents.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(v) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and a container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Pursuant to ADEM Admin. Code r. 335-14-3-.01 (7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-3-.01 [40 C.F.R. Part 265.194(b)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems must use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 335-14-3-.14(2) [40 C.F.R. § 262.251] and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [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 ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4. [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 ADEM Admin. Code r. 335-14-3-.01(5)(a)5.(ii) [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 with the words “Hazardous Waste” and with an indication of the hazards of the contents.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(f) [40 C.F.R. § 273.14(f)], a SQHUW must label or mark each Universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol cans are contained, must be labeled, or marked clearly with any of the following phrases: "Universal Waste—Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)".

Pursuant to ADEM Admin. Code r. 335-14-11-.02(6)(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(8)(d)1. [40 C.F.R. § 262.18(d)(2)] a LQG must submit a correct and complete ADEM Form 8700-12 (including all appropriate attachment pages and fees) reflecting current waste activities to the Department annually. The Department must receive the ADEM Form 8700-12 (including all appropriate attachment pages and fees) no later than the 15th day of the specified month in the specified month schedule located at 335-14-1-.02(1)(a).

Pursuant to ADEM Admin. Code r. 335-14-2-.13(11)(f)1. [40 C.F.R. § 261.4(a)(23)(ii)(f)(1)(i)] 261.410(f) the hazardous secondary material generator must attempt to make arrangements to familiarize police, fire departments, and emergency response teams with the properties of hazardous secondary material handled at the facility and associated hazards.

15) List of Attachments

Attachment 1 – Photo Log

16) Signed

Robinson, Devon Digitally signed by Robinson, Devon
Date: 2025.02.03 08:48:42 -05'00'

Devon V. Robinson
Environmental Scientist
RCRA Enforcement Section

LAURIE DIGAETANO Digitally signed by LAURIE DIGAETANO
Date: 2025.02.03 08:52:36 -05'00'

Laurie Benton DiGaetano
Environmental Engineer
RCRA Enforcement Section

17) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ
Date: 2025.02.03 08:58:22 -05'00'

Araceli B. Chavez

Chief

RCRA Enforcement Section

Attachment 1 – Photo Log

28 Photos taken on: November 21, 2024

Photos taken by: EPA Inspector Laurie Benton DiGaetano

Photos taken with: Panasonic DMC TS-5

Attachment 1
RCRA CEI Photographs

Devon Robinson, USEPA

Panasonic DMC TS-5 #S09533



Photo 1: VTD Tanks



Photo 2: VTD Tanks



Photo 3: VTD Container



Photo 4: VTD Container



Photo 5: VTD - Visible dust



Photo 6: Caster Building – Used Oil Storage

Attachment 1
RCRA CEI Photographs

Devon Robinson, USEPA

Panasonic DMC TS-5 #S09533



Photo 7: QA/QC Lab Waste



Photo 8: EAF Baghouse – Containers 3 of 5 unlabeled



Photo 9: EAF Baghouse – Aerosol SAA



Photo 10: EAF Baghouse – Open top trash cans with contaminated PPE and debris



Photo 11: East of EAF Baghouse – Vac box



Photo 12: East of EAF Baghouse – Vac box, vacuum hose, and contractor truck



Photo 13: East of EAF Baghouse – Compactor



Photo 14: East of EAF Baghouse – Compactor



Photo 15: East of EAF Baghouse – Storage Pad



Photo 16: East of EAF Baghouse – Storage Pad



Photo 17: Roll Shop – Universal Waste



Photo 18: Finishing Dept. – Universal Waste



Photo 19: Finishing Dept. – Solvent rag container



Photo 20: Finishing Dept.- Solvent recovery collection container



Photo 21: Finishing Dept.- Solvent recovery collection container



Photo 22: Finishing Dept. – Still bottoms container and solvent recovery unit



Photo 23: Oil Storage Building – Hazardous waste containers



Photo 24: Oil Storage Building – Used oil



Photo 25: Logistics Warehouse – Universal and hazardous waste



Photo 26: EAF Baghouse - Loadout Building

Attachment 1
RCRA CEI Photographs

Devon Robinson, USEPA

Panasonic DMC TS-5 #S09533



Photo 27: EAF Baghouse - Loadout Building - Contaminated PPE container



Photo 28: EAF Baghouse – CAA #4