

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

SRG GLOBAL COATINGS, LLC

101 Meatte Ave
Portageville, MO 63873
573-391-7137

EPA ID Number: MOD052612850

On

August 6 & 7, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at SRG Global, located in Portageville, Missouri, on August 6 and 7, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments represent the results of the CEI.

2.0 PARTICIPANTS

SRG Global:

- Brian Bennett, Environmental Health, and Safety (EHS) Manager (3 years with the company; and only one month in this role)
- Wayne Ernheart, Environmental Supervisor (12 years with the company)

EPA:

- Mark Holcomb, Civil Investigator/Inspector (SEE)
- John Case, State On-Scene Coordinator, Missouri Department of Natural Resources

3.0 INSPECTION PROCEDURES

On August 6, 2024, we arrived unannounced at the facility's main entrance at about 0930 hours. Initially, we conducted a visual reconnaissance of the facility searching for areas of concern observable from the adjacent public roadways and parking lots. I identified no environmental issues or concerns during this preliminary examination. We entered the facility through the main entrance. At the front security desk, I introduced myself and asked for the Mr. Darnell, the EHS

Manager listed as the site contact on the EPA verification form. I was told that Mr. Darnell was no longer with the company and that Mr. Brian Bennett was the new (acting) EHS Manager and was the primary contact for hazardous waste at this facility. We were introduced to Mr. Bennett, and he escorted us to a conference room. There we met Mr. Wayne Ernheart, the Environmental Supervisor. Mr. Bennett told us that the items of personal protective equipment required for our visual inspection at this facility were protective boots, eye protection, and safety vest.

At the opening conference, I presented my EPA ID and credentials to Mr. Bennett. I next explained the purpose and procedures of the inspection. I then presented Mr. Bennett with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights, and I informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired. Messrs. Bennett and Ernheart acted as the official facility representatives during the opening conference, visual inspection, and initial document review phases. Mr. Bennett was present for the document review wrap-up and the exit conference phase on Day 2 of the inspection.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents. We conducted a visual inspection of the following areas:

- Hazardous Waste Storage 90-Day Building (CAA)
- Used Oil Storage Building
- Northside Paint Booth
- Sludge Containment Area
- Outside Northwest Lot
- Paint Locker
- West Maintenance Storage Building
- Plater's Room

See Attachment #1 for the aerial/map views and facility diagrams. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-15 and Photos 1-19). The photo log is included as Attachment #2. Information collected during the inspection was documented on an Entry/Exit checklist and a hazardous waste compliance checklist. I reviewed documents including the following: Safety Data Sheets (SDS), manifests, invoices, three-year eManifest report, 2023 biennial report, waste stream reports, contingency plan, staff training documents, inspection checklists, wastewater permit, and waste profiles. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E unless noted otherwise.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. Bennett. I provided Mr. Bennett with a Receipt for Documents (see Attachment #3), and a Confidentiality Notice (see Attachment #4), which he signed as acknowledgement of receipt. No claim of confidential business information was made by Mr. Bennett. I provided Mr. Bennett with a copy of the Notice of Preliminary Findings (NOPF) form (see Attachment #6) and

reviewed the findings and the NOPF instructions for responding post-inspection. I provided inspection and compliance assistance documents to Mr. Bennett, which included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (yellow page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*
- *Receipt for Documents and Samples (yellow page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on the back of the form (yellow page of the completed carbonless transfer set)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

SRG Global conducts injection molding, electroplating, and painting of plastic parts used in the automotive industry. SRG Global has been located on this site since 1968, employs about 350 staff, and operates 24 hours a day five days per week. SRG Global is part of Guardian Industries, which is privately owned by Koch Industries with eight other locations in North America, as well as locations in Europe and Asia. SRG Global's headquarters is in Troy, Michigan. Mr. Bennett stated that they moved into a new building in 2018 and the old facility was torn down. The new building is about 275,000 square feet on about 15 acres of property on the southwest side of Portageville, Missouri. He also stated that they have not had any spills, fires, or activations of their emergency plan since their last RCRA inspection in 2018. The facility is in an industrial area, but I did observe residential homes within about 100 feet of the facility's perimeter and a school within about two miles.

4.2 RCRA Status

SRG Global had been previously inspected by the EPA for RCRA compliance on May 21, 2010, and had a RCRA inspection by Missouri Department of Natural Resources on March 28, 2018. According to RCRAInfo, SRG Global had most recently notified as a large quantity generator (LQG) on February 28, 2024. I verified the facility address and the site contact information with Mr. Bennett on the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5). I updated the Site Verification form to include Mr. Bennett's new contact information. Mr. Bennett stated that he has only been in the acting EHS Manager role for about six weeks. Based on the review of recent uniform hazardous waste manifests, I determined that SRG Global routinely generates D001, D002, D007, D009, D010, D035, F003, and F006 hazardous waste. A detailed review of the uniform hazardous waste manifests and eManifest report of all hazardous wastes shows about 10,204,836 pounds of hazardous waste shipped in the last 36 months, for an average of about 283,400 pounds per month, with a range of about 138,300 – 219,175 pounds per month over the previous six months. I determined the facility generates hazardous waste at the LQG level (greater than 1000 kg or 2,200 pounds per month)

and I inspected the facility as an LQG. The facility was also a small quantity handler of universal waste and a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Bennett stated that the following waste streams are managed by SRG Global:

Wastewater Sludge – SRG Global generates wastewater metal (chromium) bearing sludge from the electroplating processors, which has been determined to be D007 and F006 hazardous waste based on process and product knowledge. They generate an estimated 25,000 pounds (15,000-42,000 pounds) weekly, or about 100,000 pounds per month. The 2023 Comprehensive Biennial Report indicated they generated a total of 1.3 million pounds of this waste for the year. The wastewater from the electroplating processors is piped into the Sludge Containment Area and collected in a 12,000-gallon liquid sludge tank, which then is emptied into the sludge water separator. The separated semi-solid sludge drops down into a 30-cubic yard roll-off below and the separated water is piped back into the system for reuse or disposal to the local Publicly Owned Treatment Works (POTW) discussed in the next waste stream. The roll-off container collects the discharged sludge continuously and remains in this location until transported off-site by their hazardous waste transporter company. During the visual inspection I observed the roll-off was in good condition and had both a Hazardous Waste label and a DOT Miscellaneous Dangerous Goods warning label (see Photo 12). The wastewater sludge is transported by Spectrum Industrial Services (Alabaster, Alabama) to Envirite of Ohio (Canton, Ohio) for H010 processing (metals recovery including retorting, smelting, and chemical).

Wastewater - SRG Global is permitted to discharge wastewater from their plating, scrubber, and molding processes after an extensive industrial pretreatment in their wastewater treatment plant (WWTP). The wastewater is required to be treated for chromium reduction and pressure filtration discussed in the previous waste stream section. The City Water Permit (see attachment #10) indicates an average discharge of about 43,500 gallons per day with a maximum of 120,771 gallons per day.

Spent Chromium Filters (Hazardous Waste Solids) - SRG Global generates spent filters with chromium from the wastewater sludge generating process described above. This waste has been determined to be D007 hazardous waste based on process and product knowledge. They generated about 4,250 pounds in 2023. The attached manifest (Attachment #7 - May 5, 2024, Manifest) shows shipping details. The spent filters are stored onsite in the Platers Room and shipped about every other month by Clean Earth Specialty Waste Solutions (Blaine, Minnesota) to AES Environmental LLC (Calvert City, Kentucky) for H110 processing (stabilization prior to land disposal at another site - encapsulation /stabilization /fixation). During the visual inspection I observed spent filters stored in covered fiber boxes (about 400-500 pounds each) in the Platers Room (see Photos 18 and 19). Photo 19 shows a close-up of the “Hazardous Waste” label indicating the nature of the hazard and the accumulation start date. Photo 18 shows the DOT Miscellaneous Dangerous Goods warning label.

Waste Paint Related Materials - SRG Global generates waste paint related materials during the painting process. This waste has been determined to be D001 and F003 hazardous waste based

on process and product knowledge. See Attachments #8 and #9 for SDS of most common paint and solvent used. They generated about 83,655 pounds of this waste stream in 2023. The attached manifest (Attachment #7 - May 5, 2024, Uniform Hazardous Waste Manifest) shows shipping details. The waste paint and related materials are initially stored in 55-gallon steel drums satellite accumulation area (SAA) containers in the Paint Locker Room adjacent to the Paint Booth. Once full the drums are moved to the Hazardous Waste Storage Building, which functions as their < 90-day primary central accumulation area (CAA) (see Photos 1-7) and shipped about monthly by Clean Earth Specialty Waste Solutions (Blaine, Minnesota) to AES Environmental LLC (Calvert City, Kentucky) for H110 processing (stabilization prior to land disposal at another site - encapsulation /stabilization /fixation). During the visual inspection I observed the Northside Paint Booth Area in which painting is done by computerized robots (see Photos 9 and 10). The robot-controlled paint booth nozzles will periodically “nest” and use thinner to flush the lines. The spent paint and thinner is piped from the paint booth room to the adjacent Paint Locker Room and into a 55-gallon drum SAA container. A fill volume sensor was observed attached the second bung to prevent overfilling (see Photo 13). The SAA drum was about 1/10 full and was properly labeled with Hazardous Waste and Flammable labels with no obvious damage or leaking. Once full, Mr. Bennett stated that drum is disconnected and pulled off the line, dated, and moved to the CAA within 3 days. I observed that the only two bungs on the top of this drum were sealed during filling with the fill pipe connection (from the paint booth) and the sensor port (volume gauge) so it could not easily be manually filled if needed (see Photos 13, 14, and 15). In the center of the room was a full drum of this waste. Mr. Bennett stated that this drum had become full and was removed from the piping and dated earlier this same day and was pending transport to the CAA. This drum was also observed to be properly labeled and in good condition. The date on the drum was “8/6/2024” (this day’s date), see Photo 14. I observed another drum on the other side of this same room (see Photo 15). This 55-gallon SAA container, which appeared to be about 2/3 full, had a funnel top, that was closed and latched. Mr. Bennett stated that this drum was for the same paint and thinner waste stream but is used only for manual filling from a bucket when needed (infrequently used), since it is not practical to fill the other 55-gallon drum manually, which has no free bung opening and is being automatically filled by the robots as discussed in Photo 13. Even though this could be construed as greater than a potential total of 55-gallons per SAA waste stream, this drum is filled by a different process, and we determined it to be a separate SAA location. This drum was properly labeled and in good condition.

Waste Corrosive Liquid Acidic (Chromium) – SRG Global generates this waste from their plating process. This waste has been determined to be D002 and D007 hazardous waste based on process and product knowledge. They generated about 1,075 pounds in 2023. These drums are stored in the CAA. The waste is shipped by Clean Earth Specialty Waste Solutions (Blaine, Minnesota) to AES Environmental LLC (Calvert City, Kentucky) for H110 processing (stabilization prior to land disposal at another site -encapsulation/stabilization/fixation).

Universal Waste Lamps - Mr. Bennett stated that they are only about 10% of the way into a conversion of fluorescent to LED lamps and he estimates they generate about one box (about 20 lamps) of 8-foot lamps and two boxes (about 40 lamps) of 4-foot spent fluorescent lamps per year. He stated that they also outsource all their maintenance, so they do not generate waste batteries since these wastes are disposed of by the contractors. During the

visual inspection we observed spent lamps stored in the West Maintenance Storage Room (see Photos 16 and 17). One full box of spent 4-foot fluorescent lamps was in a cardboard protect box. The box was observed to be open on one end, but the box was stored inside of a closed yellow firebox which we determined to be adequately protected (see Photo 16). The box was labeled with “universal waste lamps” but I did not observe an accumulation start date. Another full box of spent 8-foot fluorescent lamps was in a closed cardboard protect box. The box was labeled with “universal waste lamps” but I did not observe an accumulation start date.

- **NOPF 1: Failure to demonstrate the length of time universal waste lamps have been accumulating (failure to date the containers), as required in 10 CSR 25-16.273 (MO) [40 CFR 273.15(c)]**

Used Oil – SRG Global generates about 30,000 gallons per year of used oil and oily water from their molding machine process. This waste is determined to be non-hazardous and is treated as Used Oil. See Attachment #11 for a list of the four shipments of about 4000 gallons each, in the first half of 2024. Onsite the used oil is stored in the Used Oil Storage Room in 225-gallon totes. The used oil is transported by Valicor Environmental Service (Monroe, Ohio) for recycling. During the visual inspection I observed about 28 totes (225-gallon each) stacked inside of the storage area. All the totes were labeled with “Used Oil” and appeared to be in good condition with no obvious leaks or damage (see Photo 8).

Spent Aerosol Cans – SRG Global generates a small number of spent or semi-spent aerosol cans. The cans are brought to the <90-Day CAA Hazardous Waste Storage Room and are punctured and drained in a commercial device. The liquid contents go into a 55-gallon waste paint drum and the empty cans go into an adjacent bin and are later transferred into the scrap metal recycling roll-off. During the visual inspection I observed the aerosol can processes equipment. The waste paint drum was about 1/10 full, properly labeled and in good condition, and the one cubic-yard bin was about ¾ full of empty aerosol cans (see Photo 7).

Spent Paint Booth Filters / Palladium Filters / Nickel Filters – SRG Global generates spent paint booth air filters from the painting process and the spent Palladium and Nickel filters are used in the manufacturing processes. All these filter wastes had been determined to be non-hazardous waste based on process and product knowledge. The spent paint booth filters are packed in their original cardboard boxes and stored on pallets in the Northside Paint Booth Area (see Photo 10). During the visual inspection the filters appeared to be dry. The spent paint booth filters are disposed of in the trash. The spent Nickel Filters are placed in blue poly 55-gallon drums, labeled as “non-hazardous waste”, and stored in the CAA (see Photo 6). A recent shipment of the nickel filters was 6000 pounds on May 14, 2025 (8 containers), transported by Clean Earth Specialty Waste Solutions (Blaine, Minnesota) to AES Environmental LLC (Calvert City, Kentucky) for H132 processing (landfill with prior treatment and/or stabilization). The spent Palladium Filters are stored in 1.5 cubic-yard containers in the CAA, labeled as “non-hazardous waste” (see Photo 5), and transported for recycling.

Scrap Metal - SRG Global generates about one 30 cubic-yard roll-off monthly of scrap metal. The scrap metal is determined to be non-hazardous and is transported by Dale’s Recycling

(Milan, Tennessee) monthly and sent to Jackson, Tennessee for recycling. See Attachment #12 for the invoice for the first six months of 2024 for 202,300 pounds. During the visual inspection I observed the roll-off in the North West Outside Lot (see Photo 11).

General Trash - SRG Global generates about one 40 cubic-yard roll-off of trash from office and facility operations, once every two weeks. The trash is transported by Republic Services (Dexter, Missouri). See Attachment #13 for an example invoice. During the visual inspection I observed the full roll-off in the North West Outside Lot (see Photo 11).

4.4 Other Areas Reviewed

Outside Facility Perimeter - We conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks or containers except as noted above. The facility had a security fence surrounding the perimeter and a 24/7 onsite security. See the aerial and map views in Attachment #1.

Central Accumulation Areas (CAA) – The primary CAA was in their Hazardous Waste Storage Bldg, which was the old wastewater building prior to the construction of the new factory building in 2018. The waste stream sections above describe the contents in detail. There was a no smoking sign and adequate spill kits and fire control equipment. The staff communicate with radios. See Photos 1-7. We also reviewed several months of CAA Weekly Inspection forms (see Attachment #15 for a completed sample form) with no issues noted. The weekly inspections of CAA and all areas in which they store hazardous waste appeared to be complete.

Preparedness and Prevention – The facility has numerous fire extinguishers, spill kits, and eye wash stations. The Paint Booth has a fire suppression system. Mr. Bennett stated that all facility areas were under sprinkler systems. Mr. Bennett provided a copy of the facility's Contingency Plan. The plan appeared to be comprehensive and contain all the required components, but I did observe that the primary emergency contact listed on the plan was the previous EHS Manager who reportedly had left the company about six weeks prior. Mr. Bennett shared the postal service return mail receipts documenting that they had shared the contingency plan and documented arrangements were made with their local emergency providers (fire department, emergency medical services, hospital, and police). Mr. Bennett stated that their local fire department generally visits this facility and does a walk-through annually and several employees are also members of the local volunteer fire department.

- **NOPF 2: Failure to list current emergency coordinator(s) and keep the contingency plan current, as required in 10 CSR 25-5.262(1) (MO) [40 CFR 265.52(d)]**

LQG Personnel Training – Mr. Bennett provided documentation of their staff training, both initial and annual, for all staff with hazardous and universal waste handling responsibilities. They also provided job descriptions that indicate which staff and job codes have hazardous waste handling responsibilities and that indicate the requirement for both initial and annual hazardous waste handling training (see Attachment #14 for the index of their training plan).

Uniform Hazardous Waste Manifests and Land Disposal Restrictions (LDR). We reviewed all the paper copies of Manifests and LDR for the previous three years. No issues were noted.

5.0 SUMMARY OF FINDINGS

- **NOPF 1:** Failure to demonstrate the length of time universal waste lamps have been accumulating (failure to date containers), as required in 10 CSR 25-16.273 (MO) [40 CFR 273.15(c)]
- **NOPF 2:** Failure to list current emergency coordinator(s) and keep the contingency plan current, as required in 10 CSR 25-5.262(1) (MO) [40 CFR 265.52(d)]

Other than the items specifically noted in this narrative, I observed no additional issues or potential findings. However, further EPA review may change or add to my findings.

MARK HOLCOMB
(Affiliate)

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HOLCOMB (Affiliate)
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Mark Holcomb
Civil Investigator, SEE

AMBER WHISNANT

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Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

- 1) Facility Aerial Map Views and Diagrams (4 pages)
- 2) Photo Log (19 photos and 22 pages)
- 3) Receipt for Documents (1 page)
- 4) CBI Confidentiality Notice (1 page)
- 5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
- 6) NOPF Form (1 page)
- 7) Manifest- May 14, 2024 (2 pages)
- 8) SDS- Black Paint (22 pages)
- 9) SDS- Flush Solvent (10 pages)
- 10) Wastewater Permit (14 page)
- 11) Used Oil Invoice (1 page)
- 12) Scrap Metal Invoice (1 page)
- 13) General Trash Invoice (1 pages)
- 14) Staff Training Guide Index (4 pages)
- 15) Weekly CAA Inspection Checklist (1 page)