

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

Hager Companies
150 Folmar Parkway
Montgomery, Alabama 36105
Montgomery County

EPA ID No.: ALD000608216

3) Responsible Officials

Ms. Tina Arthur-Williamson
Hager Companies
150 Folmar Parkway
Montgomery, Alabama 36105
tarthur@hagerco.com
(334) 284-4700, Ext 404

4) Inspection Participants

Tina Arthur-Williamson, Hager Companies
Jeff Miller, Hager Companies
Andrew T. Fischer, Hager Companies
Aaron Hartsock, Hager Companies
James Tungate, Hager Companies
Chad Stacey, Hager Companies
Trent Durham, Hager Companies
Craig Schimmer, Alabama Department of Environmental Management (ADEM)
William Kappler, Environmental Protection Agency, Region 4 (EPA)

5) Date and Time of Inspection

July 28, 2021, at 9:15 a.m.

6) **Applicable Regulations**

Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code § 22-30-1 *et seq.*, [Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)] 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) [40 Code of Federal Regulation (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.

7) **Purpose of Inspection**

On July 28, 2021, the EPA inspector William Kappler accompanied by ADEM inspector Craig Schimmer conducted an unannounced compliance evaluation inspection (CEI) at Hager Companies, (hereinafter, "Hager" or the "facility") to determine its compliance status with the RCRA and the State of Alabama regulations. This was an EPA-lead inspection. Inspectors arrived at Hager and proceeded to the security office to sign in and receive a visitor badge. Inspectors were then escorted to the facility administration office and were greeted by facility representatives. Inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an opening conference. EPA explained the health and safety procedures, general areas for inspection, equipment that will be used, and the RCRA records needed for review. Hager representatives identified themselves, provided an overview of the facility's history and current process operations, health and safety procedures, and record review information.

The inspectors described the possible 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. Hager 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. Required personal protective equipment were discussed. Ms. Tina Arthur-Williamson, of Hager led the inspectors on a tour of the facility's operations.

8) **Facility Description**

Hager is located at 150 Folmar Parkway, Montgomery, Montgomery County, Alabama. The facility has been at this location since 1981. The facility is located on 27 acres of property and is owned by Hager. The facility employs approximately 270 people and operates two shifts, Monday through Friday from 4:00 a.m. to 9:00 p.m. The facility's main operations are conducted in the Main Building consisting of approximately 219,908 square feet of space. Non-process operations are also conducted in the Flammables Building and the Wastewater Treatment System. The potable water service and the domestic waste service are provided by the City of Montgomery. Hager discharges its Wastewater Treatment System effluent to the City of Montgomery. The primary NAICS code for the facility is 33251, Hardware Manufacturer.

Hager's most recent notification of its regulated waste activity to ADEM was on August 10, 2020, notifying as a large quantity generator of hazardous waste (SQG) a small quantity handler of universal waste (SQHUW) and a used oil generator. The facility did not notify as a hazardous secondary materials handler.

9) General Process Description

Hager specializes in manufacturing hinges, kick-plates, pull handles, and crash plates from flat steel or brass stock and aluminum parts such as thresholds, weather stripping, and continuous geared hinges (roton). The manufacturing operation is conducted in the Main Building where the metal product is cut to length from pre-formed stock. The main building's operations also include electroplating, anodizing, lacquering, and painting of manufactured hardware and door products. The Wastewater Treatment System (WWTS) treats wastewater from the facility's plating operations. The WWTS building also serves as the facility's hazardous waste storage area (excluding ignitable hazardous waste). The Flammable Building stores flammable products used in the facility's manufacturing processes and for the storage of ignitable hazardous waste.

10) Previous Inspection History

Hager was last inspected by the ADEM on May 20, 2020. The facility was cited for storing waste selenium sludge in the secondary containment system for more than 90 days without a permit, storing two containers of hazardous waste for more than 90 days in the Ignitable Hazardous Waste Storage Area, not labeling two containers of hazardous waste with the words, "Hazardous Waste" in the Ignitable Hazardous Waste Storage Area and not keeping one container of used oil closed. The issues were resolved by an ADEM Compliance Order on December 8, 2020.

Hager was last inspected by the EPA, Region 4 for compliance with the federal and the State of Alabama hazardous waste regulations on August 24, 2006. No deficiencies were observed at the time of the inspection.

11) Findings

The information in this RCRA inspection report is based on the EPA's July 28, 2021, RCRA CEI.

Used Oil Tank

Inspectors observed a 6,000-gallon tank constructed horizontally within a concrete secondary containment system. The tank was marked with the words Used Oil. Inspectors observed some stormwater in the containment system. Ms. Williamson indicated the stormwater is pumped into the tank.

Packaging Area

This area is used to package finished products and was formerly the trim and auxiliary area. The oxidizing operations that generated selenium waste noted during ADEM's May 20, 2020, inspection have been relocated next to the plating department. The inspectors did not observe hazardous waste accumulating in this area (Photograph 1).

Maintenance Shop

Equipment maintenance and repairs are completed in this area. Maintenance shop operations generate used oil and used oil filters. Waste aerosol cans generated throughout the facility are brought to the Maintenance Shop to be punctured so that the empty cans can be managed as scrap metal. Universal waste lamps and batteries are also collected and accumulated in this area. The inspectors observed one closed 55-gallon Satellite Accumulation Area (SAA) container with an aerosol can puncture unit inserted in the container's top opening. The container was not labeled or marked with the words "Hazardous Waste" and was not labeled or marked with an indication of the hazards of the contents (Photographs 2 and 3). Ms. Williamson marked the word "Flammable" on the container's hazardous waste label, prior to inspectors leaving this area. The inspectors observed one closed 55-gallon container of used oil with a funnel attached to the container's top opening. The used oil container was not labeled or marked with the words "Used Oil". The facility marked the container with the words used oil (Photograph 5). The inspectors also observed three cardboard boxes marked "Universal Waste Lamps", one 5-gallon plastic container marked "Universal Waste–Used Ballasts", one 5-gallon plastic container marked "Universal Waste–Used Lead Acid Batteries", and one 3-gallon plastic container marked "Universal Waste–Used Dry Cell Batteries". The containers of universal waste were closed, labeled, and dated (Photograph 4).

¹Pursuant 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 the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the 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 (7)(a), [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Admin. Code r. 335-14-3-.01(a)(7) and (8), [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a), [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

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

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 (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

¹ "ADEM's newly adopted Generator Improvements Rule (GIR) regulations (effective on April 6, 2018) are currently under review by the EPA and have not yet been authorized. However, for ease of reference and for consistency with the State Inspection Report, this CEI Report will cite to the Alabama and federal hazardous waste regulations as amended by the GIR. New requirements that have become effective pursuant to the GIR, but have not yet been authorized, are noted with an asterisk. These provisions are effective and enforceable as a matter of State law but are not federally enforceable."

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).

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)(1), [40 C.F.R. § 279.22(c)(1)]. Containers and above-ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Oxidizer Line

Steel and brass parts such as hinges, lock plates, and pull handles are degreased then sent through the oxidizer station before they are plated. The oxidizer station dips parts in a selenium bath to ensure the plating metal will bond tightly to the base metal. The inspectors observed the 100-gallon capacity selenium process tank was staged on a grated metal platform over a secondary containment system to capture any spills from the process tank. Ms. Williamson indicated waste selenium accumulated in the secondary containment system is removed weekly through an inline pipe system to the facility's WWTS (Photograph 7). Hazardous waste selenium sludge (D010) and spent wipes saturated with selenium (D010) are generated in this area. The inspectors observed one closed 55-gallon SAA container accumulating selenium sludge labeled with the words “Hazardous Waste” and staged on a spill-catch roller. The inspectors observed the container was labeled with a DOT Class 9 (miscellaneous hazardous materials) pictogram. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents (Photographs 8 and 9). Ms. Williamson marked the word “Toxic” on the container's hazardous waste label, prior to inspectors leaving this area. Inspectors also observed one empty 55-gallon SAA container to accumulate waste selenium wipes. The container was closed, labeled with the words “Hazardous Waste”, and labeled with a flammable and toxic indication of the hazard of the contents.

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 (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).

Plating Department – Line 505

Three plating lines provide bright nickel, bright chrome, or dull chrome finishes. The plating lines generate waste from the rinse baths, spent nitric acid, and spent filter paper (hazardous and non-hazardous). The clean out operation from the plating lines also generate sludges. Spent plating baths and spills are removed from this area via an inline pipe system to the facility's WWTS. The inspectors observed three 55-gallon SAA containers in this area accumulating hazardous waste, one for each plating line. The inspectors observed all were closed, labeled with the words “Hazardous Waste”, and staged on a spill catch roller or a secondary containment pallet. The inspectors observed one 55-gallon SAA container accumulating waste copper and potassium cyanide filter papers (F008). The container was closed, labeled with the words “Hazardous Waste”, and labeled with a DOT Class 9 (miscellaneous hazardous materials)

pictogram to indicate the hazard of the contents (Photograph 6). The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents.

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 (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).

Lacquer Line - Line 584

The inspectors observed one 55-gallon SAA container in a red flammable locker, accumulating waste lacquer selenium (D001, D035). A closed funnel was inserted in the container's top opening. The container was labeled with the words "Hazardous Waste" and labeled with a flammable hazard indicator.

Plating Department - Line 530

The inspectors observed one 55-gallon SAA container accumulating waste copper and potassium cyanide filter paper (F008). A funnel was inserted in the container's top opening. The container was closed, labeled with the words "Hazardous Waste", and labeled with a DOT Class 9 (miscellaneous hazardous materials) pictogram to indicate the hazard of the contents. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents.

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 (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).

Ignitable Hazardous Waste Storage

The ignitable hazardous waste storage area is a free-standing containment cabinet (cabinet) large enough to hold four 55-gallon containers. The cabinet is located on a concrete pad next to the facility's flammable storage building. The cabinet was locked, and appropriate warning/security signs were posted. The inspectors observed one 55-gallon container accumulating waste oxidizer line rags. The container was closed labeled with the words "Hazardous Waste", marked with the date July 28, 2021, and labeled with a flammable hazard indicator.

Acid and Alkaline Hazardous Waste Storage Area—90-Day or Less Accumulation Area

Acid and alkaline hazardous waste is managed in a 972 square foot hazardous waste storage building located at the southeast end of the facility next to the WWTS. The 90-Day or Less

Accumulation Area (90-Day) is constructed with metal walls, a metal roof, over a concrete pad, a sloped concrete ramp, and secured by a chain-link fence and locked gate. A concrete berm is constructed along the perimeter of the concrete pad. The inspectors observed Danger signs posted on the chain-link fence and gate (Photograph 11). Waste acid and waste alkaline are accumulated in separate bays and separated by a chain link fence to ensure they remain segregated. The inspectors observed five 275-gallon totes accumulating waste alkaline (“Molplus”) in the 90-Day. The totes were closed, in good condition, with aisle space, labeled with the words “Hazardous Waste” and “Profile Pending”, and the oldest date marked on the totes was July 26, 2021. Ms. Williamson indicated that the totes were from a new process at the facility and that samples had been sent for analysis and the hazard indication was pending a determination (Photograph 10). The inspectors observed at the time of inspection, no hazardous waste was accumulating in the acid bay.

Wastewater Treatment System

Hager operates an on-site wastewater treatment system (WWTS) to treat wastewater generated from plating and anodizing processes. The WWTS is in its own building at the southeast end of the facility. The wastewater is pumped directly from the process tanks using the in-line piping system and transferred to the WWTS using 250-gallon totes. Two large tanks are staged directly behind the building for the treatment of wastewater. The treated wastewater is discharged to the Catoma Creek Wastewater Treatment Plant. The facility currently has a State Industrial Discharge Permit (IU375100071) that was issued on July 28, 2020 and is scheduled to expire on July 31, 2025. The WWTS has a recessed floor with grated drains covering all entrances. The drains are connected to a pump system that feeds back to the WWTS. Warning signs with “Hazardous Waste”, “Notice: Authorized Personnel Only”, and several placards indicating the types of hazards were posted at each entrance. The inspectors observed one 55-gallon SAA container in this area accumulating waste polishing filters (D007). The container was closed, labeled with the words “Hazardous Waste”, and staged on a spill catch roll. The inspectors observed the container was labeled with a DOT Class 9 (miscellaneous hazardous materials) pictogram. The inspectors observed the container was not labeled or marked with an indication of the hazard of the contents. Ms. Williamson marked the word “Toxic” on the container’s hazardous waste label, prior to inspectors leaving this area (Photograph 15).

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 (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).

Filter Press Room

The filter press room is located inside the WWTS building and is the final step in the wastewater treatment process. Solids are removed from wastewater as a cake using a plate and frame filter press. The inspectors observed a 20-cubic yard container under a filter press accumulating waste filter sludge (F006). The container was open in the process of actively accumulating waste from the filter press, labeled with the words “Hazardous Waste”, and marked with the date July 1,

2021 (Photograph 12). The inspectors observed the 20-cubic yard container was labeled with a DOT Class 9 (miscellaneous hazardous materials) pictogram. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents. Ms. Williamson marked the word “Toxicity” on the container’s hazardous waste label, prior to inspectors leaving this area (Photographs 13 and 14).

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 (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).

Powder Paint Room

Employees coat steel hinges with a flat primer using a powder paint process. Paint thinner is used to clean the equipment. Waste paint thinner is collected in one 55-gallon SAA container (D001, D035). The inspectors observed the container was in a flammable materials locker, the container was closed, labeled with words “Hazardous Waste”, and labeled with a flammable hazard indicator.

Anodizing Lines

Two anodized line are operated to anodize aluminum. Spent anodizing baths are pumped into totes and transferred to the WWTS. Hazardous waste was not observed accumulating in this area at the time of the inspection.

Plating Laboratory

The laboratory test samples of plating solutions obtained from the plating lines and samples from the WWTS to determine the solutions meet specifications and the WWTS is meeting the correct operating requirements. The samples are returned to each process operation. Chemicals used in the test procedures consist of acetone, sulfuric acid, nitric acid, hydrochloric acid, and sodium hydroxide. Diluted waste chemical solutions generated from the test procedure are discharge to the laboratory sink and direct by the in-line piping system to the WWTS. Hazardous waste was not observed accumulating in this area at the time of the inspection.

12) Waste Management Practices

Hazardous waste sludge (D002, D007, F006) is generated from the WWTS filter press operation, plating bath residue is generated from cleaning plating equipment (F008), anodizing waste is generated from cleaning the dip bath (D002), selenium waste is generated from cleaning the dip bath (D010), spent nitric acid is generated from the striping operation (D002), waste solvents are generated from aerosol paint cans, waste lacquer thinner is generated from the dipping baths (D001, D035), and waste selenium, waste paint thinner, and waste lacquer saturated wipes are generated from cleaning and wiping equipment (D001, D010). The facility also generates used oil, spent fluorescent lamps, spent ballasts, and spent dry cell batteries from maintenance operations. Non-hazardous waste generated include spent filter paper containing nickel-plating

solution, used coolant, waste cutting fluid, scrap metal, buffing and grinding waste.

The facility 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).

Hager used the following transporters in 2020 and 2021.

Action Resources-ALR000007237
Robbie D. Wood-ALD067138891
Univar Solutions USA Inc.-TXR000084869
Liquid Environmental Solutions-AL0000859421
RDW-TXR000084869
Lighting Resources, LLC-GAR000054049
Tradebe Transportation, LLC-INR000123497
A.R. Paquette-FLD982105884

Hager used the following TSDF in 2020 and 2021.

Chemical Waste Management-ALD000622464
Clean Earth of Alabama-ALD981020894
Liquid Environmental Solutions-AL0000859421
VLS Armor-TND981920119
Tradebe Treatment and Recycling of TN, LLC-TND000772186
Giant Resource Recovery-ALD070513767
Alpha Omega Recycling, Inc.-TXD981514383

13) Record Review

Manifests

The manifests for the shipment of hazardous waste from January 2020 to July 2021 were reviewed. One hazardous waste manifest was reviewed using the EPA's E-Manifest Record System, for a shipment on May 5, 2021.

Universal Waste Manifests

The manifests for the shipment of universal waste batteries and lamps were reviewed.

Waste Determination/Profiles/Safety Data Sheets (SDS)

The inspectors reviewed copies of the waste determination, generator waste profile, laboratory analysis and SDS documents.

The inspectors reviewed the waste profile 91-2174 and laboratory analysis for paint/lacquer waste solids, the waste profile 91-2549 and laboratory analysis for anodize seal tank solution, and the waste profile and laboratory analysis for waste nickel filter paper

Contingency Plan

The facility's contingency plan (Plan) was reviewed. The Plan was revised on July 10, 2021 (Revision 15). The inspectors observed the Plan did not have a description of all emergency equipment at the facility and its capability.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1., [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(5)-(8), [40 C.F.R. § 262.17]

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.261(e) [40 C.F.R. § 262.261(e)], which 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.

Arrangements with Local Authorities

The inspectors reviewed the arrangement with the local authorities.

Weekly Container Inspection Records

The inspectors reviewed the weekly container inspection records from January 2020 to July 2021.

RCRA Organic Air Emissions - Containers

The inspectors reviewed the facility documentation for the Level 1 DOT containers.

Personnel Training

The facility gives RCRA training to approximately 30 employees handling hazardous waste. RCRA training is given to approximately five employees who are handling and managing the hazardous waste, prior to off-site shipment to a RCRA destination facility. The inspectors reviewed the RCRA training records, job titles, and position descriptions for Tina Arthur-Williamson, Jeffery Miller, Trent Durham, James Fungale, Mike Keene, and Wiley Thorton for RCRA training given in 2020 and 2021.

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 Hager Companies representatives. The facility was informed of the findings at the time of the inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) **Conclusion/Summary of Violations**

Based on the CEI conducted on July 28, 2021, Hager Companies was inspected as a large quantity generator of hazardous waste, a small quantity handler of universal waste and a used oil generator.

17) **Signed**

William Kappler
Physical Scientist
RCRA Enforcement Section

Date

18) **Concurrence**

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Hager Companies
EPA ID.: ALD000608216
July 28, 2021
RCRA CEI Photographs
Photographs by William Kappler
Camera Model: Samsung WB250F
Property Tag #: S75917



Hager Companies, (Hager). Packaging Area
The oxidizing operations (selenium waste) noted during ADEM's May 20, 2020, CEI have been relocated next to the Plating Department. Photograph 1 taken at 10:13 a.m.



Hager. Maintenance Shop. Inspectors observed a 55-gallon SAA container not labeled/marked as hazardous waste and no hazard indicator. Photograph 2 taken at 10:24 a.m.



Hager. Maintenance Shop. Inspectors observed a 55-gallon SAA container not labeled/marked as hazardous waste and no hazard indicator. Photograph 3 taken at 10:24 a.m.



Hager. Maintenance Shop. Inspectors observed several containers accumulating spent lamps and spent batteries. Managed as universal waste. Photograph 4 taken at 10:26 a.m.



Hager. Maintenance Shop. Inspectors observed a 55-gallon container not labeled/marked as used oil. The facility labeled the container used oil. Photograph 5 taken at 10:27 a.m.



Hager. Plating Department – Line 505
Inspectors observed a DOT Class 9 (miscellaneous hazardous materials) pictogram on the 55-gallon SAA container. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents. Photograph 6 taken at 10:36 a.m.



Hager. Oxidizing Line. The inspectors observed the 100-gallon capacity selenium process tank in this area. Photograph 7 taken at 10:42 a.m.



Hager. Oxidizing Line. Inspectors observed a DOT Class 9 (miscellaneous hazardous materials) pictogram on the 55-gallon SAA container. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents. Photograph 8 taken at 10:45 a.m.



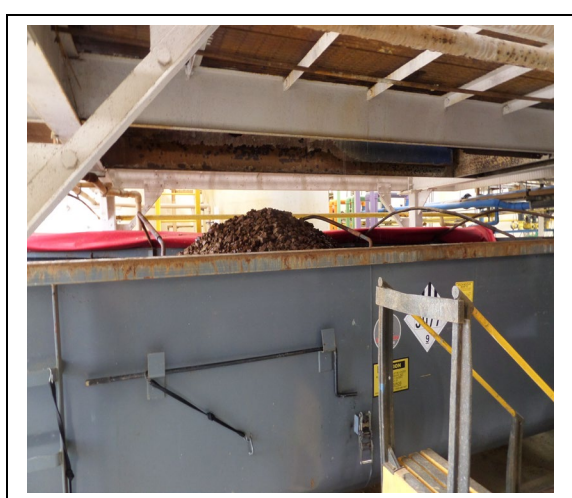
Hager. Oxidizing Line. Inspectors observed a DOT Class 9 (miscellaneous hazardous materials) pictogram on the 55-gallon SAA container. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents. Photograph 9 taken at 10:45 a.m.



Hager. Acid and Alkaline Hazardous Waste Storage Area – 90-Day. Inspector observed five 275-gallon totes, closed, labeled with the words hazardous waste, pending analysis. Photograph 10 taken at 10:52 a.m.



Hager. Acid and Alkaline Hazardous Waste Storage Area – 90-Day. Front view of 90-Day. Photograph 11 taken at 11:01 a.m.



Hager. WWT Filter Press. The inspectors observed the container was open in the process of actively accumulating waste from the filter press. Photograph 12 taken at 11:04 a.m.



Hager. WWTS Filter Press. Inspectors observed a DOT Class 9 (miscellaneous hazardous materials) pictogram on the container under the filter press. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents. Photograph 13 taken at 11:09 a.m.



Hager. WWTS Filter Press. The facility marked the container's label with the word "Toxicity" indicating the hazard of the contents. Photograph 14 taken at 11:09 a.m.



Hager. WWTS Filter Press. Inspectors observed a DOT Class 9 (miscellaneous hazardous materials) pictogram on the 55-gallon SAA container. The inspectors observed the container appeared not labeled or marked with an indication of the hazard of the contents. Photograph 15 taken at 11:09 a.m.