



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Mr. Zachary Woods
GKN Driveline Newton
1848 GKN Way
Newton, North Carolina 28658
Zachary.Woods@gknautomotive.com

Re: Request for Information
GKN Driveline Newton
Newton, North Carolina

Dear Mr. Woods:

On February 3, 2021, the U.S. Environmental Protection Agency began an investigation of your facility located at 1848 GKN Way, Newton, North Carolina to determine compliance with the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). The EPA is requesting information to determine compliance with Section 312 of EPCRA, 42 U.S.C. § 11022 and Section 313 of EPCRA, 42 U.S.C. § 11023, and the regulations promulgated at 40 CFR Parts 370 and 372, respectively. The information request is enclosed with this letter.

Please respond electronically within 15 days of the receipt of this correspondence to:

Mrs. Katelyn Bergl
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Bergl.Katelyn@epa.gov

If you have any questions regarding this request, you should contact this office prior to the deadline specified above. Please direct questions to Mrs. Katelyn Bergl at Bergl.Katelyn@epa.gov or (970) 769-7907.

Sincerely,

TODD

GROENDYKE

Digitally signed by TODD
GROENDYKE
Date: 2021.02.04
07:19:59 -05'00'

Todd Groendyke
Chief
South Air Enforcement Section

Enclosure

Enclosure

Request for Information

1. Provide all Standard Industrial Classification Codes and North American Industrial Classification System Codes under which this facility conducts business.
2. Provide the number of full time employees and total hours of part-time employees that work at or directly for the facility, including operational staff, administrative staff, contractors, dedicated sales staff, company drivers, and off-site direct corporate support.
3. Provide a description of the process at the facility from receiving the raw materials to the final product produced (include any industrial process equipment if applicable), and include a current overall process diagram for the facility.
4. Provide an inventory list of all extremely hazardous substances listed in 40 CFR § 355, Appendices A and B, brought onsite and or stored onsite in quantities greater than 500 pounds between January 1, 2017 and December 31, 2019. Indicate the maximum inventory quantity in pounds stored on site for each of these chemicals in calendar years 2017, 2018, and 2019.
5. Provide an inventory list of bulk chemicals brought onsite and or stored onsite in quantities greater than 10,000 pounds between January 1, 2017 and December 31, 2019. Indicate the maximum inventory quantity in pounds stored on site for each of these chemicals in calendar years 2017, 2018, and 2019.
6. Provide an inventory list of all toxic chemicals manufactured, processed, or otherwise used in quantities greater than the reporting threshold listed in 40 CFR § 372.28 between January 1, 2017 to December 31, 2019. For each year, indicate the total quantity in pounds that each chemical was manufactured, processed or otherwise used.
7. Provide an inventory list of all bulk chemicals manufactured, processed or otherwise used in quantities greater than 10,000 pounds per year for calendar years 2017, 2018, and 2019. For each year, indicate the total quantity in pounds that each chemical was manufactured, processed or otherwise used.
8. Provide a copy of any Safety Data Sheet that a supplier provided for bulk chemicals used in quantities greater than 10,000 pounds per year for calendar years 2017, 2018, and 2019.
9. Provide copies of any analytical chemistry reports detailing the concentrations (even at the part per billion range) of metals and metal compounds found in your process. Include copies of analytical chemistry reports for waste characterization of hazardous waste that included lead or lead compounds.
10. Provide copies of the Emergency and Hazardous Chemical Inventory (Tier I or Tier II Inventory) that were submitted for this facility for calendar years 2017, 2018, and 2019. Also provide evidence of submission to the State Emergency Response Commission, the Local Emergency Planning Committee, and the local fire department.

11. Provide copies of the Toxic Release Inventory Forms (Form R/Form A) that were submitted to the EPA for each chemical for calendar years 2017, 2018, and 2019.
12. For all EPCRA section 313 chemicals manufactured, processed, or otherwise used in quantities greater than the reporting threshold listed in 40 CFR § 372.28 between January 1, 2017 to December 31, 2019, please provide the total annual quantity of the EPCRA section 313 chemical in wastes sent to any off-site facility for the purposes of disposal, treatment, combustion for energy recovery, or recycling.
13. For all EPCRA section 313 chemicals manufactured, processed, or otherwise used in quantities greater than the reporting threshold listed in 40 CFR § 372.28 between January 1, 2017 to December 31, 2019, provide all analytical data, sampling data, and estimates used to determine the amount of the chemical released to any water media.