RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

BEKO Technologies, Corp.
900 Great Southwest PKWY SW
Atlanta, GA 30336
Fulton County

EPA ID#: GAD006190425

NAICS #: 333413 – Industrial and Commercial Fan and Blower and Air Purification Equipment Manufacturing and 339999 – All Other Miscellaneous Manufacturing

3) Responsible Officials

Markus Mueller, Vice President
MarkusMueller@bekousa.com

Melanie Jauch, Human Resources Manager
MelanieJauch@bekousa.com

Lorna Pipkin, Safety Manager
LornaPipkin@bekousa.com

4) Inspection Participants

Melanie Jauch, Beko Technologies, Corp.
Lynn Preston, GAEPD
Kayla Acosta, USEPA
Daryl Himes, USEPA

5) Date of Inspection

May 11, 2023, at 9:00 am

6) Applicable Regulations[1]

Resource Conservation and Recovery Act (RCRA) Sections 3002 (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; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018)

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.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a small quantity generator of hazardous waste (SQG) is a generator who generates greater than 100 kilograms (220 lbs) but less than 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16], a SQG may accumulate hazardous waste onsite for 180 days or less without a permit or without having interim status, as required by Ga. Comp. R. and Regs. 391-3-11-.08(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16] (hereinafter referred to as the "SQG Permit Exemption").

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine BEKO Technologies, Corp.'s compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

According to their website, BEKO Technologies Corp. (known hereinafter as "BEKO" or "the facility") develops, manufactures, and sells components and systems worldwide delivering optimized compressed air quality across an array of applications. For more than three decades, the company has developed, manufactured, and sold components and systems for compressed air treatment, processing, and condensate handling and treatment.

The facility in Atlanta specializes in manufacturing membrane dryers that help to remove moisture in air compressor systems. A polymer extrusion process is used to develop the filament product. Spinning equipment is used to produce filament from polysulfone, a specialty polymer. The filament goes through a water bath to remove excess solvent. The filament then goes through a coating process and then into an oven to cure. The first coat is with a non-hazardous amine solution. The second coat uses hexane and Isophthalyl Dichloride (IPC). The filament is

winded into spools and goes through quality assurance. A polyurethane resin is used to hold the finished filament product in spools.

BEKO has been operating at this location since 1990 and is on 2.5 acres. The facility operates two shifts, Monday through Friday, 5:00am-1:00pm and 1:00pm-9:00pm. BEKO has 89 employees at this location and operates out of one building with controlled access from the main entrance door.

BEKO has been operating as a small quantity generator (SQG) of hazardous waste since 2009. Their most recent notification of hazardous waste activity as a SQG was on February 25, 2022. Hazardous waste generated onsite include the following EPA waste codes: D001 (hexane, IPC, butyl alcohol, methanol, polymer waste). The wastewater from the filament bath was analyzed and determined to be non-hazardous and is discharged to Fulton County's Publicly Owned Treatment Works (POTW). A review was conducted by Fulton County's Department of Public Works. A determination letter from Fulton County dated September 20, 2022, concluded that pretreatment of the wastewater is not necessary, and an industrial wastewater discharge permit is not required because the facility discharges less than 25,000 gpd and is not subject to categorical pretreatment standards. The facility uses LED lighting. Some used oil can be generated from machinery. The facility also generates a small amount of spent alkaline AA and AAA batteries that are sent for recycling.

9) Previous Inspection History

Georgia Environmental Protection Division (GAEPD) has conducted one RCRA CEI at the subject facility between 2020 and 2023. On February 09, 2023, GAEPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations.

10) Opening Conference

On May 11, 2023, EPA inspectors Kayla Acosta and Daryl Himes, accompanied by GAEPD inspector Lynn Preston, arrived at BEKO at approximately 9:00 AM. Melanie Jauch, HR Manager, immediately received the inspectors. Melanie Jauch and the inspectors began the inspection with an opening conference. The inspectors introduced themselves, showed their credentials to Melanie Jauch, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The EPA inspectors explained that 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. A copy of the EPA's information sheet for small businesses can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf. The EPA inspectors 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.

Melanie Jauch 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 representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Receiving Area:

This area is used to store raw material and parts. No hazardous waste was observed in this area.

Clear Point and Qwik-Pure:

This is a parts assembly area. No hazardous waste is generated here, and no hazardous waste was observed in this area.

Spinning Room:

During production of the filament, polymer waste is generated. The facility keeps a satellite accumulation area (SAA) near the generation of the polymer waste. The inspector's observed one 55-gallon drum of polymer waste (Photo #1) in this SAA. The drum was properly closed, labeled with the words "Hazardous Waste", and contained a flammable hazard indication. Although not required for SAAs, the drum was dated with a start accumulation date.

Filament Coating:

The filament undergoes coating and is placed into an oven for curing. It is then winded into spools and examined for quality assurance. Hexane and IPC waste is generated in the coating area and stored in an SAA. No hazardous waste was observed in this area at the time of the inspection.

Potting Area:

The potting area is where polyurethane resin is made to hold the finished filament product in spools. Cured polyurethane resin waste is generated in the potting area and is non-hazardous. No hazardous waste was observed in this area.

Shipping:

Finished products are stored in the shipping area. No hazardous waste was observed in this area.

180-Day Central Accumulation Area (CAA):

BEKO manages a hazardous waste CAA inside of the building on the north side of the facility near the shipping area. The area was identified with a "Hazardous Waste" and "No Smoking" sign. The facility manages ignitable waste in this CAA.

The CAA is equipped with an alarm system capable of providing immediate emergency instruction to facility personnel and capable of summoning emergency assistance from local police departments and fire departments. The CAA is also equipped with portable fire extinguishers, fire control equipment, and spill control equipment. The inspectors did not observe any containers of hazardous waste being stored in the CAA beyond the 180-day accumulation time limit. The following hazardous waste was observed in flammable cabinets (Photos# 2-4):

- Two 5-gallon closed containers of hexane and methanol waste. One container was dated March 28, 2023, and the other was dated May 1, 2023. Both containers had a hazard indication for flammability.
- One 55-gallon closed drum of hexane waste. The container was dated April 26, 2023, and it had a hazard indication for flammability.

Emergency Procedures for an SQG:

The actions that facility personnel should take in response to an emergency are described in the facility's emergency procedures. The procedures describe 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 emergency response arrangements with the local authorities and lists the names and emergency telephone numbers for persons identified as emergency coordinators. Markus Mueller is listed as the primary emergency coordinator, and Rick Holland is the alternate.

The facility's evacuation map shows the location of emergency equipment at the facility including fire extinguishing systems, spill control equipment, and eye wash stations.

A copy of the emergency procedures was most recently submitted to the South Fulton Police Department on October 7, 2022, and to the Fulton County Fire Department and Fulton County Emergency Management on October 5, 2022. Fedex tracking receipts were available for review.

Training Records:

For SQGs, employees handling or managing hazardous waste should be receiving basic training on hazardous waste at a minimum. Training records were reviewed. Employees handling hazardous waste receive Department of Transportation HAZWOPER training and internal hazardous waste training. The most recent training for employees was conducted on February 23, 2023.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records for shipments of hazardous waste sent from May 2020 through 2022. The 2023 manifests, which were not available for review at the time of the inspection, were submitted to the inspectors for review via email on May 12, 2023. LDR forms, which were not available for review at the time of the inspection, were submitted to the inspectors for review electronically on May 16, 2023. Hazardous waste manifest records show that D001 hazardous wastes hexane, IPC, and butyl alcohol is routinely shipped to Giant Resource Recovery – Atalla, Inc. (ALD070513767) and to Tradebe Treatment & Recycling of TN (TND00072186), and that the most recent shipment was made on April 10, 2023.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b)(7)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R § 268.7(a)(2)] and is a condition of the SQG Permit Exemption, if a waste or contaminated soil does not meet the treatment standards, or if the generator chooses not to make the determination of whether his waste must be treated, with the initial shipment of waste to each treatment or storage facility, a generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the file.

Weekly Inspections of CAA:

The inspectors reviewed BEKO's available records of weekly inspections of the CAA since August 06, 2022. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The records include the date of the inspection and the name, signature, and initials of the employee conducting the inspection.

No weekly inspection records were provided for May 2020 through July 2022.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b)(2)(iv)], which is a condition of the SQG Permit Exemption, the small quantity generator must inspect central accumulation areas at least weekly. The small quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (b)(2)(i) of this section for remedial action required if deterioration or leaks are detected.

A follow up email from BEKO received on May 16, 2023, indicated that weekly inspections of the CAA were being conducted prior to August 2022, but that they were not properly being documented. Since August 2022, weekly inspections are being conducted and were verified through the weekly inspection logs that were available for review at the time of the inspection.

Waste Profiles, Safety Data Sheets, and Hazardous Waste Determinations:

Waste profiles, safety data sheets, and hazardous waste determinations were available for review for all hazardous and non-hazardous waste streams. The facility uses Montrose Environmental as an environmental consultant for hazardous waste determinations and analysis.

12) Closing Conference

The inspectors conducted the exit meeting with Melanie Jauch. During the exit meeting, the inspectors stated their preliminary conclusions of the inspection. BEKO agreed to provide the requested LDR forms, 2023 manifests, and missing weekly CAA inspections.

On May 12, 2023, and May 16, 2023, Melanie Jauch provided the requested records in an email to Kayla Acosta and Lynn Preston. The only records not included were the missing weekly CAA inspections from May 2020 through July 2022.

13) List of Appendices

Appendix 1 – Photo Log: Please note an error in the date/time stamp on each photo which displays a date of May 10, 2023, and an incorrect time of day. This was an error in the digital

camera setting during first-time use. The photos were all taken on May 11, 2023, between 9:00 am to 11:00 am.

14) Signed

KAYLA ACOSTA Digitally signed by KAYLA ACOSTA
Date: 2023.06.22 11:56:56 -04'00'

Kayla Acosta
Physical Scientist

15) Concurrence

LAURIE DIGAETANO Digitally signed by LAURIE DIGAETANO
Date: 2023.06.22 12:07:47 -04'00'

for Araceli B. Chavez
RCRA Enforcement Section

Appendix 1 – Photo Log

Four Photos taken on: May 11, 2023
Photos taken by: Kayla Acosta
Photos taken with: Canon PowerShot Elph 180
EPA Property Tag: S/N 902063018726

Photo 1: 55-gallon drum of polymer waste (Photo #1). The drum was properly closed, labeled with the words “Hazardous Waste”, and contained a flammable hazard indication.

Photo 2: One 5-gallon closed container of hexane and methanol waste dated March 28, 2023, with a hazard indication for flammability.

Photo 3: One 5-gallon closed container of hexane and methanol waste dated May 01, 2023, with a hazard indication for flammability.

Photo 4: One 55-gallon closed drum of hexane waste. The container was dated April 26, 2023, with a hazard indication for flammability.