

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

GM Nameplate, Inc. EPA ID# NCD003156510
North Carolina Division
300 Acme Drive
Monroe, North Carolina 28112

3) Responsible Officials

Kevin Casey, Process Engineering Manager
Richard Harper, R & D Chemist

4) Inspection Participants

Kevin Casey, GM Nameplate Rose Pruitt, NCDEQ
Richard Harper, GM Nameplate Laurie Benton DiGaetano, USEPA

5) Date of Inspection

January 7, 2021

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), Title 15A of the North Carolina Administrative Code (NCAC), Chapter 13; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine GM Nameplate's compliance with the applicable requirements of RCRA and the corresponding NCDEQ regulations. This was an EPA lead inspection.

8) Previous Inspection History

On February 26, 2015, NCDEQ conducted the most recent RCRA CEI at the subject facility and

found apparent violations of RCRA's requirements for hazardous waste container management. As a result, NCDEQ issued a Short Form Compliance Order (SFCO) with an Administrative Penalty on July 20, 2015, and the parties entered into a Settlement Agreement on December 9, 2015 to resolve the matters arising from the CEI and SFCO. NCDEQ verified that the facility had returned to compliance during a follow-up inspection on January 14, 2016.

9) **Facility Description**

GM Nameplate (GMN) manufactures metal nameplates and decorative trim used primarily by customers in the automotive, appliance and cosmetic markets. The company has a total of six manufacturing plants, with a total of more than 1,000 employees. Corporate headquarters are located in Seattle, Washington, and manufacturing plants are located in Washington, California, North Carolina, Oregon, Singapore, and China. The subject facility in Monroe, North Carolina, has been in operation for over thirty years. The facility currently operates under the NAICS Codes 323113 for Commercial Screen Printing and 332812 for Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers. GMN has approximately 61 employees at this location, and operations typically run on one eight-hour shift, five days per week.

Specific operations at the subject facility include metal fabrication, lamination, printing, and roll coating. Most metal arrives at the facility in a coil of aluminum, which is cut into sheets to be processed on-site. GMN applies customer designs to metal sheets using screen printing, digital printing, and occasional lithographic printing processes. Employees mix base inks to create specific colors for use in the screen printing and lithographic printing processes. Digital printing is done using water-based inks that are applied using an automated printing process. Primers or topcoats may also be applied to metal sheets using the roll coating process. Hazardous wastes generated on-site are primarily excess inks and spent solvents generated during cleaning activities. In addition, the facility routinely generates a hazardous waste solid containing mercury in the doming laminate process.

Screens used in the screen-printing process are assembled on-site and prepared with a UV reactive emulsion coating. Once assembled, the screen can be reused unless and until the screen rips, tears, or become otherwise unsuitable for further use. To assemble the screen, new screen material is cut to fit and then stretched tight in the frame assembly device. The assembled screen is then prepared by applying a UV reactive emulsion coating to the surface of the screen. Employees then secure a template onto the coated screen and place the template and screen into a unit where they are exposed to UV light. Exposed emulsion coating reacts with the UV light, while the covered, or unexposed, emulsion coating does not react. After exposure, the screen is removed from the UV unit and rinsed with water. The water washes away any emulsion coating that did not react with the UV light, leaving only the reacted emulsion coating that has adhered to the screen. This reacted coating prevents inks from passing through the screen and onto the metal sheet during screen printing operations. To reuse the screen, employees first use solvents and rags to remove any excess inks from the screen. Employees then wash the emulsion coating from the screen with an alkaline solution and then scrub away any remaining coating using a haze remover. The bare screen is then re-coated and prepared again for reuse.

GMN notified as a small quantity generator (SQG) of hazardous waste at this location from 2008

until 2015 but has otherwise operated here as a large quantity generator (LQG) during the past 30 years. The company most recently notified as an LQG of hazardous waste as part of the 2019 biennial report on 02/26/2020. Hazardous wastes identified in the report include: D001 / D035 / F003 / F005 waste flammable liquids (methyl ethyl ketone) from painting / coating, D009 hazardous waste solid (mercury) from painting / coating, D001 / F003 / F005 waste flammable liquid (mineral spirits, toluene) from painting / coating, D001 / F003 / F005 waste flammable solid from painting / coating, D002 waste corrosive liquids (aluminum sulfate, organic polymers) from etching, D001 non-hazardous liquids from painting / coating, D001 waste flammable liquid (naphtha/2-methoxy-1-methylethyl acetate) from painting / coating, and D009 waste lamps.

At the time of the inspection, GMN had identified four satellite accumulation areas (SAAs) and one central accumulation area (CAA) for managing hazardous waste. Personnel estimated that the facility generates between three and four 55-gallon drums of hazardous waste each month, and that they are working on establishing a monthly hazardous waste pick-up with US Waste Industries. Solvent contaminated wipes are accumulated in numerous flammable cans throughout the facility, and they are stored in 55-gallon drums near the CAA prior to shipment off-site.

10) Opening Conference

On January 7, 2021, EPA inspector Laurie Benton DiGaetano, accompanied by NCDEQ inspector Rose Pruitt, arrived at the GMN facility at approximately 9:00 a.m. Mr. Richard Harper, R & D Chemist, immediately received the inspectors. Mr. Harper and the inspectors were joined by Mr. Kevin Casey, Process Engineering Manager, for the opening conference. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Casey and Mr. Harper led the inspectors on a tour of the facility operations.

Mr. Harper and Mr. Casey provided an overview of the facility's history and current operations during the opening conference. GMN 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. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

11) Findings

R & D Laboratory: The facility tour began in the R & D laboratory. GMN had not identified a satellite accumulation area (SAA) in this laboratory, but the inspectors observed one one-gallon container labeled as F005 / F003 / D001 hazardous waste ink sludge with UV component on a laboratory counter (Photo 1). The hazardous waste label indicated that this waste is identified with the waste profile number C134888, and the container was identified with a flammable liquid hazard placard. Mr. Harper explained that he pours waste material from laboratory testing into this container in order to transport it to the SAA located in the Screen Print Area One. The R & D Laboratory is located in a room that is separate from the Screen Print Area One, with an operator and processes that are different from the processes performed in Screen Print Area One.

As a result, the inspectors advised that when hazardous wastes generated in the R & D Laboratory is removed from this area, it should be transferred to a central accumulation area (CAA) rather than to a separate SAA. The SAA in Screen Print Area One is neither at or near the point of generation where R & D Laboratory wastes initially accumulate, nor is it under the control of the operator of the R & D Laboratory processes generating the waste.

Pursuant to 15A NCAC 13A .0107(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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

The inspectors also noted that the 55-gallon drum in the Screen Print Area One SAA was labeled D001 / D035 / F005 hazardous waste flammable liquid (MEK¹), which is different from the F005 / F003 / D001 hazardous waste ink sludge with UV component label on the one-gallon container in the R & D Laboratory. Mr. Harper explained that the hazardous waste label on the one-gallon container was only intended to indicate that the container should be used to accumulate hazardous waste, but that the waste description on the label was not intended to describe the waste in the container. It was unclear if the R & D Laboratory generates D001 / D035 / F005 hazardous waste flammable liquid (MEK), F005 / F003 / D001 hazardous waste ink sludge with UV component, or both. Furthermore, Ms. Pruitt observed that, according to product labels observed on the one-gallon containers of ingredients used in the ink mixing process, some of these ingredients contain lead. GMN did not provide any records of analytical testing to verify that the D001 / D035 / F005 hazardous waste flammable liquid (MEK), or the F005 / F003 / D001 hazardous waste ink sludge with UV component do not exceed the regulatory threshold for the toxicity characteristic of any heavy metals found in the ink ingredients, including the threshold for D008 hazardous waste containing lead.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator’s knowledge of the waste and support the generator’s determination, as described at paragraphs (c) and (d) of this section.

¹ Methyl ethyl ketone

Screen Print Area One: GMN manages a SAA inside the Screen Print Area One, and the inspectors observed one 55-gallon drum in this SAA (Photo 2). The drum was labeled D001 / D035 / F005 hazardous waste flammable liquid (MEK), and it was identified with a flammable liquid hazard placard. The small bung on the lid of the drum was open.

Pursuant to 15A NCAC 13A .0107(a) [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.

The inspection participants observed an employee conducting screen printing operations at a workstation near the door in Screen Print Area One. Mr. Harper and Mr. Casey explained that personnel prepare enough ink for each batch of screen printing. Although larger volumes of excess ink may be retained for future use, excess ink is typically poured into the 55-gallon accumulation container described above when the corresponding batch of printing is complete.

Mr. Harper and Mr. Casey also explained that personnel routinely clean the screen with solvent and rags during and after screen printing activities. The inspection participants observed the employee cleaning the screen and disposing of the contaminated rags in an open flip-top flammable can. The lid of the container was propped open, so that it did not close before or after the employee placed the rags into the container. The container accumulating solvent contaminated rags was labeled “oily waste,” “empty every night,” and “contains solvent wipes.” The container was not labeled as “excluded solvent contaminated wipes.”

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

Mr. Casey stated that each operating press in the Screen Print Area is equipped with a container for accumulating solvent contaminated wipes, and he estimated that the area houses five of these

containers (Photos 3 – 5). The inspectors observed the words “contaminated shop towels,” and “keep closed” on these containers, but none of the containers were labeled “excluded solvent contaminated wipes.”

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

Mr. Casey explained that used print screens are cleaned and reused on-site unless and until the screen rips, tears, or become otherwise unsuitable for further use. Typically, damaged screens are brought to the screen assembly area next to Screen Print Area One, where employees determine if the screen can be repaired and reused. The inspectors observed several damaged screens staged in the screen assembly area waiting for repair or disposal. This area is equipped with a trash can for managing general trash, and the inspectors observed discarded screens in that trash can. The inspectors also observed discarded used print screens inside an open trash can in the Screen Print Area One (Photo 6). The inspectors also observed droplets on the transparent screens and asked if those droplets could be listed hazardous waste spent solvents left on the screens from cleaning operations. Mr. Harper speculated that the droplets may be dried adhesive from tape on the edges of the screen.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.

Screen Print Area Two: At the time of the inspection, no operations were active in the Screen Print Area Two. Mr. Casey explained that this area is not used as frequently as Screen Print Area One. Waste ink generated in this area is accumulated in the Ink Lab SAA. Screen Print Area Two is located in a room that is separate from the Ink Lab, with operators and processes that are different from the processes performed in Ink Lab. As a result, the inspectors advised that when hazardous wastes generated in the Screen Print Area Two are removed from this area, they should be transferred to a CAA rather than to a separate SAA. The SAA outside the Ink Lab is neither at or near the point of generation where Screen Print Area Two wastes initially accumulate, nor is it under the control of the operators of the Screen Print Area Two processes generating the waste.

Pursuant to 15A NCAC 13A .0107(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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7)]

and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

The inspectors observed approximately five step-open flammable cans for accumulating solvent contaminated wipes (Photo 7). None of the containers were labeled “excluded solvent contaminated wipes.”

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

Roll Coat Area Two: At the time of the inspection, no operations were active in the Roll Coat Area Two. Mr. Casey explained that this area is not used as frequently as Roll Coat Area One. GMN manages one SAA inside the Roll Coat Area Two, and the inspectors observed one 55-gallon drum in this SAA (Photo 8). The drum was labeled D001 / D035 / F005 hazardous waste flammable liquid (MEK), and it was identified with a flammable liquid hazard placard. The drum was dated 12/09/2020. The small bung on the lid of the drum was open.

Pursuant to 15A NCAC 13A .0107(a) [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.

The inspectors also observed one step-open flammable can containing contaminated wipes in this area. The container was not labeled.

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

Ink Lab SAA: GMN manages a SAA just outside of the Ink Lab, and the inspectors observed one 55-gallon drum in this SAA (Photo 9). The hazardous waste label on this drum was not immediately visible, because it was located on the side of the drum next to the wall. Mr. Harper immediately retrieved a drum caddy and moved the drum in order to observe the hazardous waste label. The drum was labeled D001 / F003 / F005 hazardous waste ink sludge with UV component (mineral spirits), and it was identified with a flammable liquid hazard placard. The hazardous waste label indicated that this was identified with the waste profile number C134888. The drum was equipped with a latched funnel lid in the large bung, but the small bung on the lid of the drum was open. Mr. Harper replaced the small bung into the opening.

Pursuant to 15A NCAC 13A .0107(a) [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.

Ink Lab: Mr. Harper and Mr. Casey explained that GMN does not manufacture inks or coatings at the facility. These materials are typically purchased in one-gallon containers, and the materials are mixed together to create the desired color of ink or coating required for each batch. Once mixed, the inks and coatings are sent to the screen printing and roll coating areas for use. Ms. Pruitt observed that, according to product labels observed on the one-gallon containers of ingredients used in the ink and coating mixing process, some of these ingredients contain lead. GMN did not provide any records of analytical testing to verify that the D001 / D035 / F005 hazardous waste flammable liquid (MEK), or the F005 / F003 / D001 hazardous waste ink sludge with UV component do not exceed the regulatory threshold for the toxicity characteristic of any heavy metals found in the ink and coating ingredients including the threshold for D008 hazardous waste containing lead.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator’s knowledge of the waste and support the generator’s determination, as described at paragraphs (c) and (d) of this section.

Used one-gallon containers are disposed of in the general trash. Residues in a container that is not RCRA-empty are fully subject to the Subtitle C regulations of RCRA. Because the contents of the one-gallon product containers may be regulated as hazardous waste when disposed, it is important to ensure that the containers are RCRA-empty, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.7], when they are discarded.

Waste inks and coatings are typically not generated in the Ink Lab, but the area does generate solvent contaminated wipes from clean-up activities. The inspectors observed two flammable cans for accumulating solvent contaminated wipes (Photo 10). These containers were not labeled “excluded solvent contaminated wipes.”

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

Stamping / Fabrication Area: GMN conducts metal fabrication activities such as embossing, cutting / stamping, and folding in the Stamping / Fabrication Area. Mr. Casey explained that employees in this area may use vanishing oil, but not solvents in this area. No hazardous wastes or solvent contaminated wipes are generated in this area.

Doming Area: GMN manages a SAA for managing D009 hazardous waste solid (mercury) generated in the Doming Area. GMN uses a two-part urethane product which contains mercury to create a clear dome on customer labels. When mixed, the two liquid components react within approximately eight minutes to form a clear, solid urethane. It is therefore necessary to purge the mixing lines with cleaner whenever the system is shut down for more than a couple minutes. Employees purge the urethane components from the lines into a shallow, lined tray, where the components react to form a block of D009 hazardous waste solid (mercury) (Photo 11). This block and the tray liner are both removed from the tray and placed into a 55-gallon hazardous waste accumulation drum (Photo 12).

The tray and the drum are both containers within the SAA. Although GMN may manage more than one container in the same SAA, please note that the SAA Permit Exemption limits the total volume of waste accumulated in this area at any given time to be no more than 55 gallons. Pursuant to 15A NCAC 13A .0107 [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with 15A NCAC 13A .0107 [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

The inspectors observed that accumulation tray containing purged urethane components was left open to the atmosphere, and it was not labeled as hazardous waste or marked with an indication of the hazards of its contents. The 55-gallon drum of solidified purged urethane components was labeled D009 hazardous waste solid (mercury), and it was identified with a DOT class 9 hazard placard. Although the drum was covered with a lid, it did not have a ring to secure that lid.

Pursuant to 15A NCAC 13A .0107(a) [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 15A NCAC 13A .0107(a) [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.

As employees prepare to restart the system, they fill the mixing lines again with the urethane components. This process purges cleaner from the lines and employees accumulate the purged liquid in a 5-gallon bucket. The contents of the 5-gallon bucket are transferred into a 55-gallon drum (Photo 13). The inspectors observed the 5-gallon bucket next to the process unit, and the 55-gallon drum along the wall inside this room. The bucket was open, and it was not labeled. The drum was equipped with a latched funnel; it was labeled nonhazardous waste with profile

number F137581; and it was identified with a flammable liquid placard.

According to the waste profile for F137581, GMN has used generator knowledge to determine that the material generated when purging lines during system restart is non-hazardous. Although urethane components containing mercury may also be discharged into this 5-gallon bucket at the end of the purging process, the facility did not provide records to support a determination that this material does not exceed the regulatory threshold for D009 hazardous waste containing mercury.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator’s knowledge of the waste and support the generator’s determination, as described at paragraphs (c) and (d) of this section.

The inspectors also observed one 55-gallon drum labeled non-RCRA Isophorone diisocyanate along the wall in the Doming Area (Photo 14). The drum was identified with a poison hazard placard, and the waste profile number B107658. Neither Mr. Harper nor Mr. Casey was familiar with this waste or how it was generated.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.

Lithographic Area: GMN manages a SAA in the Lithographic Area for managing hazardous waste excess ink with UV component and hazardous waste ink with UV component that is generated by cleaning the lithographic equipment with solvents. The inspectors observed one 55-gallon drum (Photo 15) and one two-gallon container in this SAA. The drum was located in the far corner of the room, and it was equipped with a latched funnel lid. Although ink waste drips and spills covering the hazardous waste label made it difficult to read, the drum appeared to be labeled D001 / F003 / F005 hazardous waste ink waste with UV component. The drum was also identified with a flammable liquid hazard placard. The two-gallon container was observed beneath a table near the workstation. The container was not labeled, but the employee working in this area confirmed that the contents of this container are poured into the 55-gallon drum.

Pursuant to 15A NCAC 13A .0107(a) [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.

Although GMN may manage more than one container in the same SAA, please note that the SAA Permit Exemption limits the total volume of waste accumulated in this area at any given time to be no more than 55 gallons. Pursuant to 15A NCAC 13A .0107 [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with 15A NCAC 13A .0107 [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

The inspectors also observed two step-open flammable cans containing contaminated wipes in this area. These containers were not labeled “excluded solvent contaminated wipes.”

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

Digital Printing Area: At the time of the inspection, no operations were active in the Digital Printing Area. The inspectors observed the water-based inks loaded into the printing unit. Mr. Casey explained that the process is similar to laser jet printing, and that no hazardous wastes are generated in this area.

Ink Shed - Central Accumulation Area (CAA): GMN manages a hazardous waste CAA in the Ink Shed, a large room outside of the production area. Upon entering this area, the inspectors observed several rows of shelving along the left wall. The shelving held customer retained ink samples. The inspectors also observed a row of six 55-gallon drums containing solvent contaminated rags in a row along the right side of this room (Photo 16). Five of the drums were labeled excluded solvent contaminated wipes, but the sixth drum was not labeled. Three of the drums did not have a lid, and the lids on two of the remaining three drums were not secured.

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

The inspectors observed one additional 55-gallon drum with a large sign resting on top of the drum (Photo 17). The sign indicated that this drum is for Kord and Rotary shop towels. Mr. Casey explained that these towels are accumulated and stored separately because, unlike the shop towels used throughout the rest of the facility, these shop towels are not lint-free. This drum was closed, and it was labeled as excluded solvent contaminated rags.

Along the left wall past the rows of customer returns, the inspectors observed nine cardboard boxes of used 4-foot fluorescent lightbulbs and one box of used 8-foot fluorescent lightbulbs (Photo 18). The containers were closed, but no labels identifying the contents as universal waste bulbs were observed. A partial accumulation start date was observed on only one of the ten boxes of bulbs. The month and day of the accumulation start date were not visible, but the date indicated that the bulbs had been there since the year 2019. According to the records provided during the inspection, the most recent shipment of universal waste from the GMN facility was a shipment of universal waste fluorescent lamps sent to Southeast Recycling Technologies (TNR000003137) on 01/23/2019.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste (SQHUW) identify the type of universal waste by labeling or marking each lamp or container of lamps clearly with one of the following phrases: “Universal Waste – Lamp(s), or “Waste Lamp(s),” or “Used Lamp(s).”

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.15(a) and (c)], a small quantity handler of universal waste (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.

At the far end of the long room, the inspectors observed the designated hazardous waste CAA. The area was identified with a sign which read “danger, hazardous waste storage.” The inspectors observed two 55-gallon drums of hazardous waste in the CAA (Photo 19). The first drum was labeled as D001 / D035 / F005 hazardous waste flammable liquid (MEK) and identified with a flammable liquid hazard placard. The second drum was labeled F005 / F003 / D001 / D035 hazardous waste roll coat wash waste flammable liquid (MEK), and it was identified with a flammable liquid hazard placard. Both drums were closed and marked with an accumulation start date. The older drum was dated 12/06/2020.

The inspectors also observed a “no smoking” sign, an overpack drum, a fire extinguisher, and a sprinkler system in this area. Neither Mr. Casey nor Mr. Harper had any knowledge of a maintenance program for the sprinkler system. Mr. Casey explained that the area is equipped with an internal alarm button, and although a pull-down fire alarm is located inside the production area, the CAA is not equipped with a communication device to summon outside assistance.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates

15A NCAC 13A .0107(i) [40 C.F.R. § 262.252(b)], and is a condition of the LQG Permit Exemption, all areas where hazardous waste is generated or accumulated on site must be equipped with a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.253], and is a condition of the LQG Permit Exemption, all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.

Hazardous Waste Manifests: The inspectors reviewed available manifests for shipments of hazardous wastes sent from the facility from the year 2018 through the date of the inspection. Records indicate that shipments of D001 / D035 / F005 waste flammable liquid (MEK), F005 / F003 / D001 / D035 waste flammable liquid (MEK), F005 / F003 / D001 waste flammable liquid (mineral spirits, toluene), D001 waste flammable liquid (naptha / 2-methoxy-1-methylethylacetate), and/or F005 / D001/ F003 waste flammable solids are sent to GRR Sumter (SCD036275626) approximately once every 30-90 days. Records also indicated that three shipments of D009 hazardous waste solid (mercury) were sent to Tradebe (TND000772186).

The records did not include a signed return copy of hazardous waste manifest number 000271883GRR for a shipment of F005 / F003 / D001 hazardous waste liquid (mineral spirits, toluene) to GRR Sumter (SCD036275626) on 12/11/2019. The records also did not include signed returned copies of hazardous waste manifest numbers 022637021JJK, 021180721JJK, and 013928242FLE for shipments of D009 hazardous waste solid (mercury) to Tradebe (TND000772816) on 11/04/2020, 11/20/2019 and 10/01/2019, respectively. No records were provided to show that GMN contacted the transporter or the owner or operator of the designated facility to determine the status of this waste, and GMN did not submit exception reports for these missing manifests.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.42(a)(1) and (2)], an LQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

The records also indicate that one shipment of 5-gallons of D002 hazardous waste solid (mercury) was sent to Tradebe (TND000772186) on 04/20/2020 under manifest number 010673913JJK. GMN's EPA identification number had not been entered into Item 1. of this manifest. Instead, this cell read "CESQG." The EPA hazardous waste code for wastes containing mercury is D009, but this waste code was not included on the manifest.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.20(a)(1)], a generator that transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, must prepare a Manifest on EPA Form 8700-22.

Pursuant to the EPA Form 8700-22 Section I. Instructions for Generators, the generator's U.S. EPA twelve-digit identification number, or the state generator identification number if the generator site does not have an EPA identification number must be entered in Item 1. Generator's U.S. EPA Identification Number.

Pursuant to the EPA Form 8700-22 Section I. Instructions for Generators, up to six federal and state waste codes to describe each waste stream identified in Item 9b can be entered in Item 13. Waste Codes. State waste codes that are not redundant with federal codes must be entered here, in addition to the federal waste codes which are most representative of the properties of the waste.

According to the records provided during the inspection, the most recent shipment of universal waste from the GMN facility was a shipment of universal waste fluorescent lamps sent to Southeast Recycling Technologies (TNR000003137) on 01/23/2019.

Solvent Contaminated Wipes: Ms. Pruitt observed that, according to product labels observed on the one-gallon containers of ingredients used in the ink and coating mixing process, some of these ingredients contain lead. Pursuant to 15A NCAC 13A .0102(b) [40 C.F.R. § 260.10] solvent contaminated wipes that contain listed hazardous waste other than solvents, or exhibit the characteristic of toxicity, corrosivity, or reactivity due to contaminants other than solvents, are not eligible for the exclusions at 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26) and 40 C.F.R. § 261.4(b)(18)]. GMN did not provide any records of analytical testing to verify that the solvent contaminated wipes do not exceed the regulatory threshold for the toxicity characteristic of any heavy metals found in the ink and coating ingredients including the threshold for D008 hazardous waste containing lead.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator's knowledge of the waste and support the generator's determination, as described at paragraphs (c) and (d) of this section.

GMN could not provide any records for shipments of solvent-contaminated wipes being sent off-site for laundering or dry-cleaning. GMN did not provide documentation of the name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day time limit in 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(ii)] is being met; or a description of the process the generator is using to ensure

the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.

Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(v)(A), (B), and (C)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, generators must maintain the following documentation at their site: name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day accumulation time limit in 40 C.F.R. § 261.4(a)(26)(ii) is being met; and description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.

Weekly Inspections of CAA: The inspectors reviewed the available records of inspections of the facility's CAA from 01/05/2018 through the date of the inspection. The records include a place to note if the hazardous waste storage drums are in good condition, if they are sealed, if they are properly labeled with a yellow hazardous waste and an indication of the major hazard, if they are marked with an accumulation start date, if spill kits are available, if the area around the drums is free of standing liquid, if SAAs are limited to the need to work in the area, if waste lamp containers are sealed, and if waste lamp containers are labeled with description of the contents. The checklists appeared to be photocopies of completed inspection forms with only the date of the inspection written onto the form. Prior to 04/01/2020, the inspection records did not include the name, initials, or signature of the person conducting the inspection. No records of inspections were provided between 11/05/2018 and 11/19/2018 (14 days), 12/18/2018 and 01/07/2019 (20 days), 01/22/2019 and 02/05/2019 (14 days), 02/12/2019 and 02/25/2019 (13 days), 02/25/2019 and 06/10/2019 (105 days), 08/13/2019 and 09/19/2019 (37 days), 11/13/2019 and 12/03/2019 (20 days), 04/01/2020 and 04/16/2020 (15 days), 11/18/2020 and 12/02/2020 (14 days), and 12/16/2020 and 01/06/2021 (21 days).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking container and for deterioration of containers caused by corrosion or other factors.

Contingency Plan: The actions that facility personnel should take in response to an emergency are described in the Facility's Emergency / Disaster Management Plan, which was last updated on 04/03/2015. The plan includes a list of emergency response equipment available at the facility with a description of the equipment and its location. The plan also included an evacuation map, a fire prevention and evacuation plan, and a description of emergency alarms and evacuation notification signals. The plan did not include secondary evacuation routes, and the facility map did not identify the location of all available emergency response equipment.

According to USPS tracking documentation, the original plan was submitted to Clean Harbors, the Monroe Police Department, Monroe Fire HazMat, Union EMS, Carolinas Healthcare, Union County Emergency Management, and NCDENR. The original plan listed the names and emergency telephone numbers of persons identified as emergency coordinators. The original list of names had been updated by crossing out the names of persons no longer identified as emergency coordinators and entering the names of new persons by hand. However, the

emergency telephone numbers had not been updated, and the revised plan was not sent to the emergency response entities.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.261(a), (c), (d) and (f)], and is a condition of the LQG Permit Exemption, the contingency plan must describe the 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; it must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or, if applicable, the Local Emergency Planning Committee; it must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator, and this list must be kept up to date; and it must include an evacuation plan for generator personnel which describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended whenever the list of emergency coordinators changes.

Please note that 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)] requires an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in 15A NCAC 13A .0107(i) [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)].

Training: GMN's hazardous waste training records did not include the job titles and descriptions for persons responsible for managing hazardous waste, or the names of employees filling those positions. No records were provided to show that the contingency plan was reviewed by employees. The only available record of hazardous waste training was a certification indicating that Mr. Harper had completed RCRA Hazardous Waste Generator Training on 12/21/2020.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(i)-(iii)], which is a condition of the LQG Permit Exemption, facility personnel must successfully complete a program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. Facility personnel must successfully complete this training within six months and must take part in an annual review of the initial training.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the LQG must maintain the following documents and records at the facility: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position at the facility related to hazardous

waste management; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and records that document that the training or job experience, required in this section, has been given to, and completed by, facility personnel.

12) **Out-Briefing**

The inspectors conducted the exit meeting with Mr. Casey and Mr. Harper. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) **Conclusion**

Based on the observations made during the inspection, GMN apparently deficient with the following RCRA requirements:

- Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes when accumulated, stored, and transported, must be contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.
- Pursuant to 15A NCAC 13A .0106 [40 C.F.R. § 261.4(a)(26)(v)(A), (B), and (C)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, generators must maintain the following documentation at their site: name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day accumulation time limit in 40 C.F.R. § 261.4(a)(26)(ii) is being met; and description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator’s knowledge of the waste and support the generator’s

determination, as described at paragraphs (c) and (d) of this section.

- Pursuant to 15A NCAC 13A .0107(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 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).
- Pursuant to 15A NCAC 13A .0107(a) [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 15A NCAC 13A .0107(a) [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 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking container and for deterioration of containers caused by corrosion or other factors.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.252(b)], and is a condition of the LQG Permit Exemption, all areas where hazardous waste is generated or accumulated on site must be equipped with a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.253], and is a condition of the LQG Permit Exemption, all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.261(a), (c), (d) and (f)], and is a condition

of the LQG Permit Exemption, the contingency plan must describe the 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; it must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or, if applicable, the Local Emergency Planning Committee; it must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator, and this list must be kept up to date; and it must include an evacuation plan for generator personnel which describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended whenever the list of emergency coordinators changes.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(i)-(iii)], which is a condition of the LQG Permit Exemption, facility personnel must successfully complete a program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. Facility personnel must successfully complete this training within six months and must take part in an annual review of the initial training.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the LQG must maintain the following documents and records at the facility: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position at the facility related to hazardous waste management; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and records that document that the training or job experience, required in this section, has been given to, and completed by, facility personnel.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.20(a)(1)], a generator that transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, must prepare a Manifest on EPA Form 8700-22.
- Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.42(a)(1) and (2)], an LQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest

with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

- Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste (SQHUW) identify the type of universal waste by labeling or marking each lamp or container of lamps clearly with one of the following phrases: “Universal Waste – Lamp(s), or “Waste Lamp(s),” or “Used Lamp(s).”
- Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.15(a) and (c)], a small quantity handler of universal waste (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.

14) **Signed**

Signature
Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

Date

Concurrence

Signature
Kimberly L. Bingham
Chief
Chemical Safety and Land Enforcement Branch

Date

GM Nameplate
RCRA CEI Photographs
Laurie Benton DiGaetano, U.S. EPA

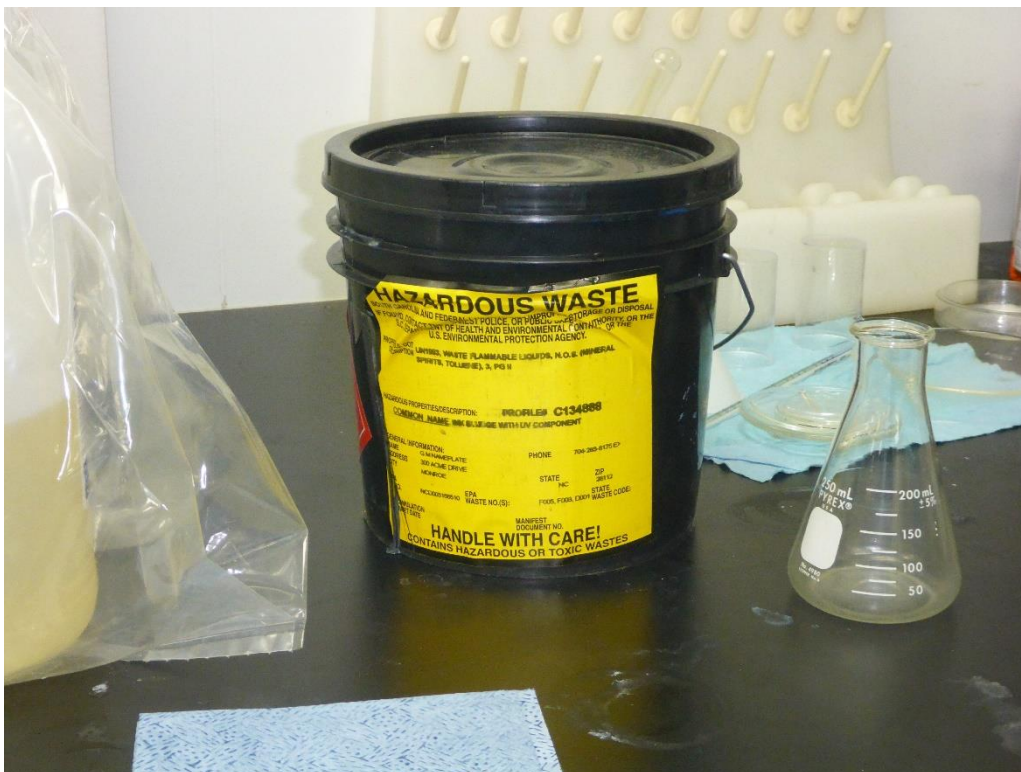


Photo 1: One one-gallon container for accumulating hazardous waste generated in the R & D Laboratory. The container is marked with the waste profile number C134888, labeled as F005 / F003 / D001 hazardous waste ink sludge with UV component, and identified with a flammable liquid hazard placard.

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Photo 2: One 55-gallon container for accumulating hazardous waste generated in the Screen Print Area One. The container is labeled as D001 / D035 / F005 hazardous waste flammable liquid (MEK), and identified with a flammable liquid hazard placard.

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Photo 3: One flip-top 5-gallon container for accumulating solvent contaminated wipes in the Screen Print Area One. The container, which was located next to one of the screen print stations, was not labeled “excluded solvent contaminated wipes.”

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Photo 4: One flip-top 5-gallon container for accumulating solvent contaminated wipes in the Screen Print Area One. The container, which was located next to one of the roll coat stations, was not labeled “excluded solvent contaminated wipes.”

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Photo 5: One flip-top 5-gallon container for accumulating solvent contaminated wipes in the Screen Print Area One. The container, which was located next to one of the screen print stations, was not labeled “excluded solvent contaminated wipes.”

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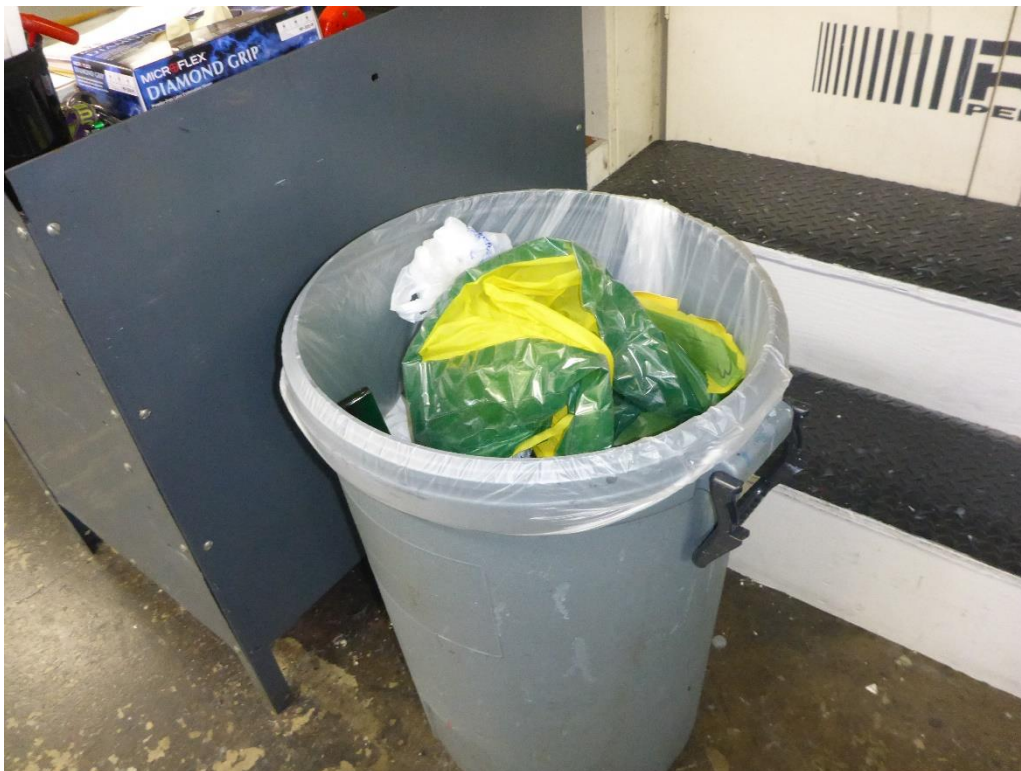


Photo 6: Discarded used print screens inside an open trash can in Screen Print Area One.

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Photo 7: Flip-top containers for accumulating solvent contaminated wipes in the Screen Print Area Two. The containers were not labeled “excluded solvent contaminated wipes.”

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Photo 8: One 55-gallon container for accumulating hazardous waste generated in the Roll Coat Area Two. The container is labeled as D001 / D035 / F005 hazardous waste flammable liquid (MEK), and identified with a flammable liquid hazard placard. The small bung on the lid of the drum was open.

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Photo 10: One 5-gallon flip-top container for accumulating solvent contaminated wipes in the Ink Lab. The container was not labeled “excluded solvent contaminated wipes.”

GM Nameplate
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Photo 11: Process unit in the Doming Area. When the system needs to be shut down, the two-part urethane is purged from the lines into a shallow tray lined with plastic. This tray is shown on the right side of the metal box in this photo. After the purged urethane reacts and forms a block of D009 hazardous waste solid, the block and liner are removed from the tray and placed into a 55-gallon hazardous waste accumulation drum.

When the system is prepared for restarting, cleaner is purged from the lines into the drain shown on the left side of the metal box. Purged liquid flows from the drain into the 5-gallon bucket on the floor. The contents of the bucket are transferred into a 55-gallon non-hazardous waste accumulation drum.

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Photo 12: One 55-gallon container for accumulating D009 hazardous waste solid in the Doming Area. The container is labeled as D009 hazardous waste solid (mercury) and identified with a DOT class 9 hazard placard.

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Photo 13: One 55-gallon container for accumulating purged liquid from restarting the doming process unit. The container is marked with waste profile number FC137581, labeled as non-hazardous waste, and identified with a flammable liquid hazard placard.

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Photo 14: 55-gallon container labeled non-RCRA Isophorone diisocyanate in the Doming Area. The container was identified with a poison hazard placard and the waste profile number B107658.

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Photo 15: One 55-gallon container for accumulating hazardous waste in the lithographic area. The drum was identified with a flammable liquid hazard placard. Ink waste drips and spills obscured part of the hazardous waste label, but the container appeared to be labeled as D001 / F003 / F005 hazardous waste ink sludge with UV component (mineral spirits).

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Photo 16: A row of six 55-gallon drums containing solvent contaminated rags in the Ink Shed. Five of the drums were labeled excluded solvent contaminated wipes, but the sixth drum was not labeled. Three of the drums did not have a lid, and the rings on two of the remaining three drums were not secured.

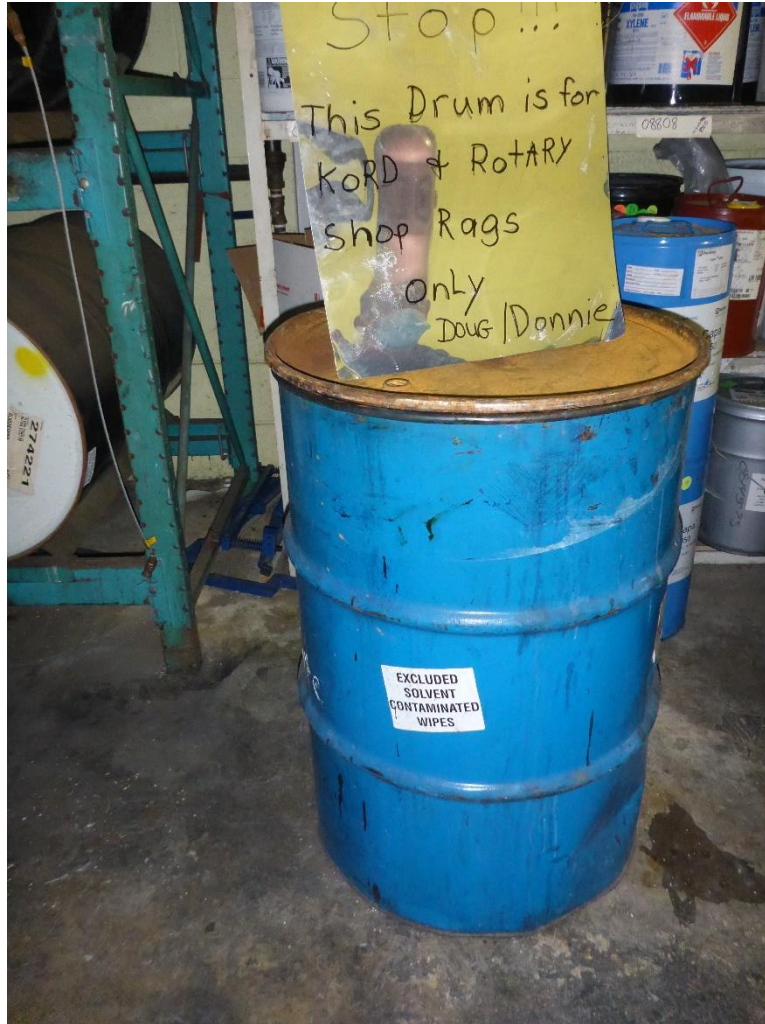


Photo 17: Additional 55-gallon drum containing solvent contaminated rags in the Ink Shed. These towels are accumulated separately because they are not lint-free. The drum is closed, and it is labeled excluded solvent contaminated wipes.

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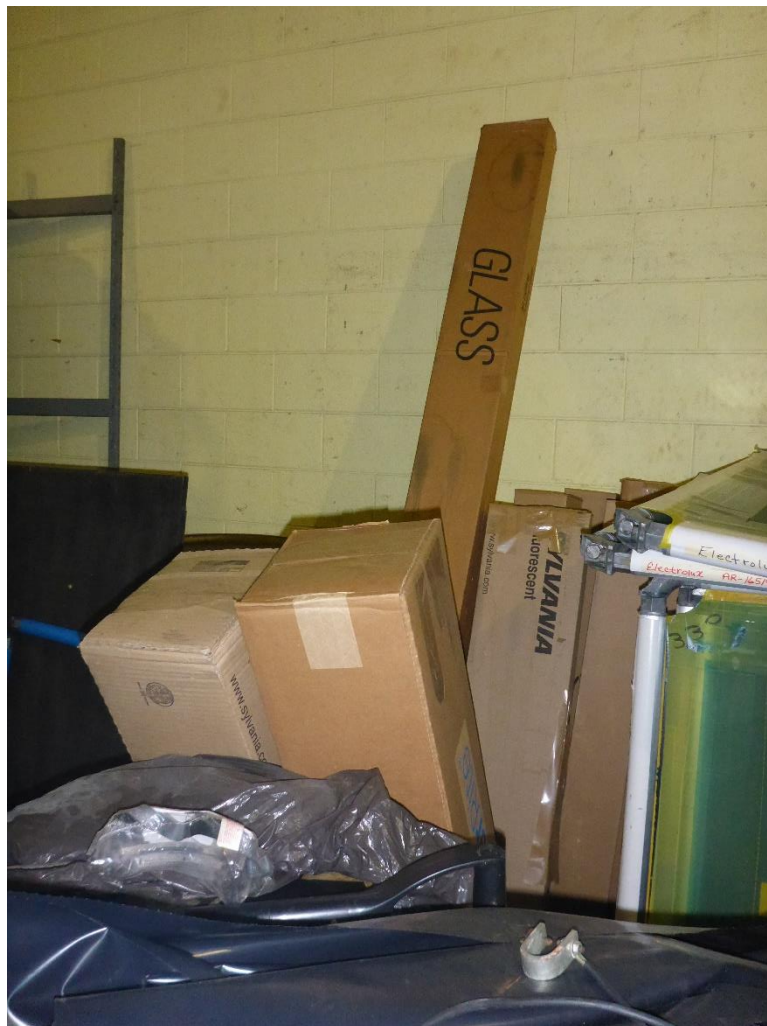


Photo 18: Nine cardboard boxes of used 4-foot fluorescent lightbulbs and one box of used 8-foot fluorescent lightbulbs. The containers were closed, but no labels identifying the contents as universal waste bulbs were observed. A partial accumulation start date was observed on only one of the ten boxes of bulbs. The month and day of the accumulation start date were not visible, but the date indicated that the bulbs had been there since the year 2019.

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Photo 19: Two 55-gallon drums of hazardous waste in the Ink Shed CAA. The first drum was labeled as D001 / D035 / F005 hazardous waste flammable liquid (MEK) and identified with a flammable liquid hazard placard. The second drum was labeled F005 / F003 / D001 / D035 hazardous waste roll coat wash waste flammable liquid (MEK), and it was identified with a flammable liquid hazard placard. Both drums were closed and marked with an accumulation start date.