

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
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2) Facility Information

Mankiewicz Coatings LLC
1200 Charleston Regional Parkway
Charleston, South Carolina 29492

(Mankiewicz)

EPA ID# SCR000783035

3) Responsible Officials

Fabian Grimm
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4) Inspection Participants

Sven Schroeder	Mankiewicz (Quality Manager) (Exit Interview Only)
Malcom Little	Mankiewicz (Order Clearing)
Patrick Locicero	Mankiewicz (Maintenance Supervisor)
Chris Gore	Mankiewicz (Maintenance) (Central Accumulation Area (CCA) Only)
Nazariy Karcherskiy	Mankiewicz (Tinting Operator) (Tinting Area Only)
Gerald Shealy	SC DHEC Columbia
Daryl R. Himes	US EPA Region 4 Atlanta

5) Date of Inspection

December 15, 2022, at 9:15 a.m. EDT

6) Applicable Regulations¹

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; South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 *et seq.*, and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279.

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 S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 262.10], a Large Quantity Generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2200 lbs) of non-acute hazardous waste in a calendar month.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [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 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(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 Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.262.16(b)(2) or [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(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 S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.20(a)(1) [40 C.F.R. § 262.20(a)(1)], a generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, must prepare a Manifest according to the instructions included in the appendix to S.C. Code Ann. Regs. 61-79.262 [40 C.F.R. Part 262].

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Mankiewicz’s compliance with the applicable requirements of RCRA and the corresponding SC DHEC regulations. This was an EPA lead inspection.

8) Facility Description

Mankiewicz is a high-quality paint, top-coat, hardeners and thinner manufacturing facility located in Charleston, South Carolina. The facility produces paints with custom colors in a special “tinting” area. Paints manufactured at the facility start with paints that are initially manufactured at Mankiewicz facilities located in Germany and also produced from virgin ingredients at this facility. Mankiewicz employs 80 personnel at this location that work on one shift from 6 a.m. until 2 p.m.

Paints are manufactured by the batch in vessels with volumes up to approximately 600 gallons.

Paints are sold in containers with sizes which include quarts, gallons, 55-gallon drums and 275-gallon plastic totes.

Equipment used by the facility for its paint manufacturing operations include mixers for blending liquid and solid ingredients and milling machines which grind the paints in order to reduce the particle size of metallic ingredients.

Mankiewicz's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated January 1, 2021, described the facility as a Large Quantity Generator (LQG) of hazardous waste. The notification listed the following EPA Waste Codes: D001, D005 and D007 characteristic and F003 and F005 listed hazardous wastes.

9) Previous Inspection History

This facility was last inspected on November 28, 2016, by SC DHEC. No issues were observed during the inspection.

10) Opening Conference

On December 15, 2022, EPA inspector Daryl Himes, accompanied by SC DHEC inspector Gerald Shealy, arrived at Mankiewicz at approximately 9:15 a.m.

Malcolm Little, employed within the Order Clearing department of the facility, immediately received the inspectors. The inspectors presented their credentials and were escorted to a break room for an opening conference and discussion of facility operations. Introductions were conducted and the inspectors explained the purpose of their visit and stated their desire to see all active generation and accumulation locations of hazardous waste, used oil and universal wastes.

The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records. Mankiewicz Coatings exceeds the number of employees to be considered a small business. The EPA inspector 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. The company did not assert a business confidentiality claim.

11) Inspection Observations

A walk-through inspection of the facility was then performed. Photos documenting the inspection, and referenced herein, can be seen in Attachment A.

Unless noted otherwise, all containers of hazardous waste observed within SAAs were closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard associated with the waste contained.

In addition, unless noted otherwise, all containers of hazardous waste observed within central accumulation areas (CAAs) for less than 90 days were closed, marked with an accumulation start date, labeled with the words “Hazardous Waste,” and marked with an indication of the hazard associated with the waste contained.

Tinting Area

The Tinting Area is located on the western side of the facility (See Map provided in Attachment B). Blending of paints for tinting purposes is performed in this area in 25, 50, and 200-gallon vessels. Nazariy Karcherskiy (Tinting Operator) assisted the inspection team’s findings in this area with descriptions of materials used and which materials were spent at the time of the inspection.

One 20-gallon container, used for the collection of hazardous waste solids (D001/F003), was observed in a SAA next to a solvent cleaning machine containing acetone. (Photo 1).

Beneath the acetone solvent cleaning machine, the inspectors observed two open and unlabeled containers of spent acetone solvent (Photo 2). One of the two containers had a volume of 6.4-gallons (12-inch diameter, 13-inch height) and was observed with 5-inches of spent solvent. The other container had a volume of 2.5-gallons (9-inch diameter, 9-inch height) and was observed with 2-inches of spent solvent within the container.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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 (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [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.

Scratch-On Production Area

The Scratch-On Production Area is located on the northwest corner of the facility (Attachment B).

Powders, liquids, resins and solvents are blended in this area to make some of the facility’s products. Some of the blended mixtures produced are also milled in this area in a machine which reduces the particle sizes of powders and resins in the paint mixtures to allow for better application. This area utilizes four blending machines and two milling machines.

Two 12-gallon (14-inch diameter, 18-inch height) containers of hazardous waste solids were observed within SAAs near a workstation in this area (Photo 3 shows one of the containers).

One 25-gallon (18-inch diameter, 23-inch height) container of hazardous waste solids (Photo 4) was also observed within a SAA in this area. (Photo 5 shows the contents of container).

Two 15-gallon containers of in-use acetone solvents were observed in open top containers in the area of the facility's milling machines.

One 55-gallon container of hazardous waste solids was observed within a SAA in this area. Photo 6 shows the contents of the container. Photo 7 shows the exterior of the container which was not labeled with the words "Hazardous Waste" or with an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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 (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Hardener/Thinner Production Area

The Hardener/Thinner Production Area is located in the northeast corner of the facility (Attachment B). Blending of hardeners and thinners is performed in this area.

One 25-gallon (18-inch diameter, 23-inch height) container of hazardous waste solids (Photo 8) was observed to be open within a SAA this area.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [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.

One 55-gallon container of hazardous waste solids was observed within a SAA in this area. Photo 9 shows the label on the container. Photo 10 shows the container which was not labeled with the words "Hazardous Waste" or with an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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 (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Cleaning Area (Photos 55-57)

This area is located to the south of the Hardener/Thinner Production Area. This area is used for the cleaning of vessels used for mixing purposes throughout the facility. Hazardous wastes generated in this area are deemed to be within a hazardous waste CAA.

One employee was observed bringing an open 5-gallon mop bucket of spent acetone into the area to be deposited into an accumulation container (Photo 11). The container was not labeled with the words hazardous waste or with an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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 (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [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.

Two 275-gallon totes of hazardous waste spent acetone solvents were observed in this area (Photos 13 and 14). One of the totes was not marked with an accumulation start date (Photo 12).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Two 55-gallon drums of hazardous waste hardeners with isocyanates were observed in this area on a pallet in the central part of the area. The labels on the containers were not marked with accumulation start dates (Photos 15 and 16).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Twelve 55-gallon drums (blue) of hazardous waste spent solvents were observed on three pallets against the western interior wall of the facility in this area (Photo 17). Eleven of the containers were observed to be without accumulation start dates.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

One of the containers on the bottom pallet against the western interior wall was marked with a “10/5/2022” accumulation start date.

Four 55-gallon blue drums of hazardous waste (three contained spent solvents and one with solids) were also observed in the central area of the cleaning area (Photo 18). Three of the drums, as seen in Photo 18, were observed on a pallet to the left of the fourth container which was observed on the floor. One of the three drums observed on the right side of the pallet, as shown in Photo 18, was open with its bung not in its hole (Photo 19) and its lid ajar (Photo 20).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

In addition, three of the drums discussed immediately above, which can be seen with the yellow “Hazardous Waste” labels were not marked with an accumulation start dates.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

The fourth of the blue drums, containing hazardous waste solids and flammable liquids was marked with an accumulation start date of “4/20/22.”

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [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 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925].

One 15-gallon container of hazardous waste liquids observed in the CAA of the cleaning area (Photo 22) was not marked with an accumulation start date.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

One 55-gallon drum of hazardous waste solids shown in Photos 23 and 25 was observed along the southern wall of the facility’s cleaning area. The drum was being used to accumulate crushed solids at the time of the inspection. A sign shown in Photo 24 was attached to the top of the drum

crushing device. The drum of hazardous waste solids was observed to be open at the time of the inspection and was not marked with an accumulation start date or an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

The northern border of the cleaning area is formed by a pallet rack capable of managing six pallets across on three levels or 18 pallets total. Below is “Diagram 1” which depicts the pallet position locations that will be used to identify the locations of 55-gallon drums and cubic yard boxes that were present on pallets within the pallet rack. The letters T, M and B were used to designate Top, Middle and Bottom positions on the pallet rack, respectively.

Diagram 1

T1	T2	T3	T4	T5	T6
M1	M2	M3	M4	M5	M6
B1	B2	B3	B4	B5	B6

For positions on the pallet rack which hold pallets managing 55-gallon containers, the “Diagram 2” below will be used to identify the drums as they were positioned on each pallet at the time of the inspection with the letters in the parenthesis providing the designation. For positions on the pallet rack which hold cubic yard boxes on a pallet, BOX will follow the pallet position.

Diagram 2

Back Left Drum (BLD)	Back Right Drum (BRD)
Front Left Drum (FLD)	Front Right Drum (FRD)

In addition, four pallets of drums were observed immediately in front of the pallets in the B2 – B5 positions of the pallet rack. The findings for drums on these pallets will also be described in Table 1.

These pallets will get the designation of FB2-FB5, respectively, in the Pallet Position column of Table 1.

Table 1 below will include location descriptions of each 55-gallon drum and cubic yard box of hazardous waste as they were positioned at the time of the inspection. Diagrams 1 and 2 above will be used to describe the position of each 55-gallon drum and box as they were at the time of the inspection on the pallet rack. Numbers within parentheses below indicate photos in Attachment A of the container or label on the container in that position.

Table 1

Pallet Position	Drum or Box Position	Missing “HW” Label	Missing Indication of Hazard	Open	Bulging/ Compromised	Missing Accum. Start Date	Accum. Start Date Over 90 Days
FB2	FLD		X (26)				4/20/2022 (27)
FB2	FRD		X (26)				4/20/2022 (28)
FB3	BLD		X (29)			X	
FB3	BRD	X				X	
FB3	FRD		X	X (29)		X	
FB4	BLD	X	X			X	
FB4	BRD	X	X			X	
FB4	FLD		X			X	
FB4	FRD		X			X	
FB5 (30)	BLD	X	X	X (32)		X	
FB5 (30)	BRD					X	
FB5 (30)	FRD		X			X	
FB5 (30)	FLD		X	X (32)		X	

Pallet Position	Drum or Box Position	Missing "HW" Label	Missing Indication of Hazard	Open	Bulging/ Compromised	Missing Accum. Start Date	Accum. Start Date Over 90 Days
T1	BRD	X		X (50) (51)	X (50) (51)	X	
T1	FRD						06/02/2022 (52)
T2 (49)	BLD			X (47) (48)	X (47) (48)		07/21/2022
T2 (49)	BRD						04/18/2022
T2 (49)	FRD						07/10/2022
T2 (49)	FLD		X				07/20/2022
T3	BOX (D001)		X			X	
T4	BOX		X				10/29/2022
T5	BOX		X			X	
T6	BLD	X					07/07/2022
T6	BRD	X					07/06/2022
T6	FRD	X					07/09/2022
T6	FLD	X					07/04/2022
M1	BLD	X (42)				X	
M1	BRD	X (42)				X	
M1	FRD	X (42)				X	
M1	FLD	X (42)				X	
M2	BLD		X				04/20/2022
M2	BRD						04/20/2022

Pallet Position	Drum or Box Position	Missing "HW" Label	Missing Indication of Hazard	Open	Bulging/ Compromised	Missing Accum. Start Date	Accum. Start Date Over 90 Days
M2	FRD						04/20/2022 (43)
M2	FLD					X	
M3	BLD		X			X	
M3	BRD	X	X			X	
M3	FRD	X	X		X (44)	X	
M3	FLD	X	X			X	
M4	BOX (F003)		X			X (45)	
M5 (46)	BLD	X	X			X	
M5 (46)	FRD	X	X			X	
M5 (46)	FLD		X			X	
M6	BLD						03/16/2022
M6	BRD						04/10/2022
M6	FRD						03/15/2022
M6	FLD						04/20/2022
B1	BLD (85 gal.)	X	X	X (41)		X	
B1	FRD (85 gal.)	X	X	X (40)		X	
B2	BLD						05/26/2022 (38)
B2	BRD						05/26/2022 (39)
B2	FRD						07/01/2022
B2	FLD	X				X	

Pallet Position	Drum or Box Position	Missing "HW" Label	Missing Indication of Hazard	Open	Bulging/Compromised	Missing Accum. Start Date	Accum. Start Date Over 90 Days
B3	BOX (37)						10/04/2022 (36)
B4	BLD	X				X	
B4	BRD	X	X		X (34)	X	
B4	FRD	X				X	
B4	FLD	X		X Spill on Top	X (35)	X	
B5	BLD	X (33)	X			X	
B5	BRD	X (33)	X			X	
B5	FRD	X (33)	X			X	
B5	FLD	X (33)	X			X	
B6	BLD	X				X	
B6	BRD		X			X	
B6	FRD		X			X	
B6	FLD		X			X	

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [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 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925].

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous

waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(ii) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the LQG Permit Exemption.

Filler Area

The Filler Area is located in the middle of the eastern side of the facility (Attachment B). Repacking of paints and filling of paints from the Tinting Area is performed in this area.

One 55-gallon of ignitable (D001) hazardous waste was observed within a SAA at the time of the inspection.

Three 12-gallon (14-inch diameter, 18-inch height) containers of hazardous waste solids were observed within SAAs at the time of the inspection.

Metallic Area

Blending of metallic paints is performed using one large and three small blenders in this area.

Four 12-gallon (14-inch diameter, 18-inch height) containers of hazardous waste solids were observed within SAAs at the time of the inspection.

Two 55-gallon containers of ignitable hazardous wastes were observed in this area (Photo 53). One of the drums (gray drum on left in Photo 53) was full and marked with an accumulation start date of “12/01/2022.” The other 55-gallon drum (blue drum on right in Photo 53) was not marked with an indication of the hazards of the contents, or an accumulation start date as the facility had failed to move the gray drum from this area within three days of becoming full. In addition, the funnel in the blue drum was not closed as the latch was broken which would close its lid (Photo 54).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous

waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Inspection Records

After the walkthrough, the inspectors requested and reviewed the facility's applicable training records, contingency plan, inspection records and manifests.

During a review of the facility's manifests, ignitable hazardous wastes sent off-site included those containing xylene, mineral spirits and isocyanates in addition to the acetone solvent used within a solvent cleaning machine in the Tinting Area as discussed above.

A review of the facility's hazardous waste training records indicated that Malcolm Little had completed hazardous waste training for 2019 (August 8, 2019), 2020 (September 29, 2020) and 2022 (April 20, 2022). No other hazardous waste training records for other employees were available or had seemingly been performed at the time of the inspection.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7) [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, (i) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations; (ii) Facility personnel must complete personnel training within six months of being hired or of being assigned to a new position at the Facility; (iii) Facility personnel must take part in an annual review of the initial training required by this section; and/or (iv) the generator must maintain training records that include, among others: 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; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

A review of the facility's hazardous waste manifests indicated that designated facility to generator copies of manifests had not been received within 45 days for manifests 023876662 JJK (June 7, 2022), 023876663 JJK (June 7, 2022), 023876846 JJK (July 22, 2022), 023876847 JJK (July 22, 2022), 023880634 JJK (September 15, 2022), 023880635 JJK (September 15, 2022), 023880795 JJK (October 1, 2022), and the facility had submitted no exception reports.

Pursuant to S.C. Code Ann. Regs. 61-79.262.42(a)(2) [40 C.F.R. Part 262.42(a)(2)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31 or § 261.33(e) in a calendar month, 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.

A review of the facility's inspection logs showed the facility to have failed to perform weekly inspections from October 14, 2022 through the date of the inspection (nine occasions). In addition, please note that the 55-gallon drum in the BLD Diagram 2 drum position in the Diagram 1 T2 pallet position was observed to be open and bulging (Photos 48 and 49). The drum was marked with an accumulation start date of July 21, 2022. Also please note that the 55-gallon drum in the BRD Diagram 2 drum position in the Diagram 1 T1 pallet position was observed to be open and bulging (Photo 50 and 51). An adjacent drum of similar material on the T1 pallet was marked with an accumulation start date of June 21, 2022.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v) [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 containers and for deterioration of containers caused by corrosion or other factors.

Closing Conference

The inspection team conducted an exit meeting at the end of the walk-through inspection and review of the facility's hazardous waste records with facility personnel which included Julian Smalls and Curtis Jeffcoat. During this meeting, the inspectors discussed their preliminary findings made during the inspection.

12) Signed

DARYL HIMES Digitally signed by DARYL HIMES
Date: 2023.01.31 10:00:56 -05'00'

Daryl R. Himes
Environmental Engineer

Date

13) Concurrence

**ARACELI
CHAVEZ** Digitally signed by
ARACELI CHAVEZ
Date: 2023.01.31
11:32:49 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

Mankiewicz Coatings LLC

Charleston, South Carolina

COMPLIANCE EVALUATION INSPECTION

SCR000783935

December 15, 2022

Photographs taken by Daryl R. Himes
Photographs taken with Canon Power Shot Elph 360 HS



Photo 1 – 12-gallon container of hazardous waste solids in Tinting Area



Photo 2 – Containers of in-use solvents beneath solvent cleaning machine in the Tinting Area



Photo 3 – 12-gallon container of hazardous waste solids



Photo 4 – One of two 12-gallon containers of hazardous waste near a workstation in Scratch-On Production Area



Photo 5 – Contents of 12-gallon container observed at workstation in Scratch-On Production Area



Photo 6 – Contents of 55-gallon drum of hazardous waste solids in Scratch-On Production Area



Photo 7 – Outside of 55-gallon drum of hazardous waste solids in Scratch-On Production Area



Photo 8 – 25-gallon container of hazardous waste solids in Hardener/Thinner Production Area



Photo 9 - Label on Drum of Hazardous Waste in Hardener/Thinner Production Area



Photo 10 - Drum of Hazardous Waste in Hardener/Thinner Production Area



Photo 11 – Mop bucket of spent acetone within facility's Cleaning Area



Photo 12 – Label on 275-gallon tote of hazardous waste in Cleaning Area



Photo 13 - 275-gallon tote of hazardous waste in Cleaning Area.



Photo 14 - 275-gallon tote of hazardous waste in Cleaning Area.



Photo 15 –Label on 55-gallon drum of hazardous waste hardeners with isocyanates w/o accumulation start dates.



Photo 16 – Pallet with two red 55-gallon drum of hazardous waste hardeners with isocyanates w/o accumulation start dates.



Photo 17 – Twelve 55-gallon drums (blue) of hazardous waste spent solvents observed on pallets on western interior wall.



Photo 18 – Four blue drums of hazardous waste spent solvent observed in the central area of the Cleaning Area.



Photo 19 – Open drum (missing bung) of hazardous waste spent solvents on right side of pallet as shown in Photo 18.



Photo 20 – Open drum (lid open) of hazardous waste spent solvents on right side of pallet as shown in Photo 18.

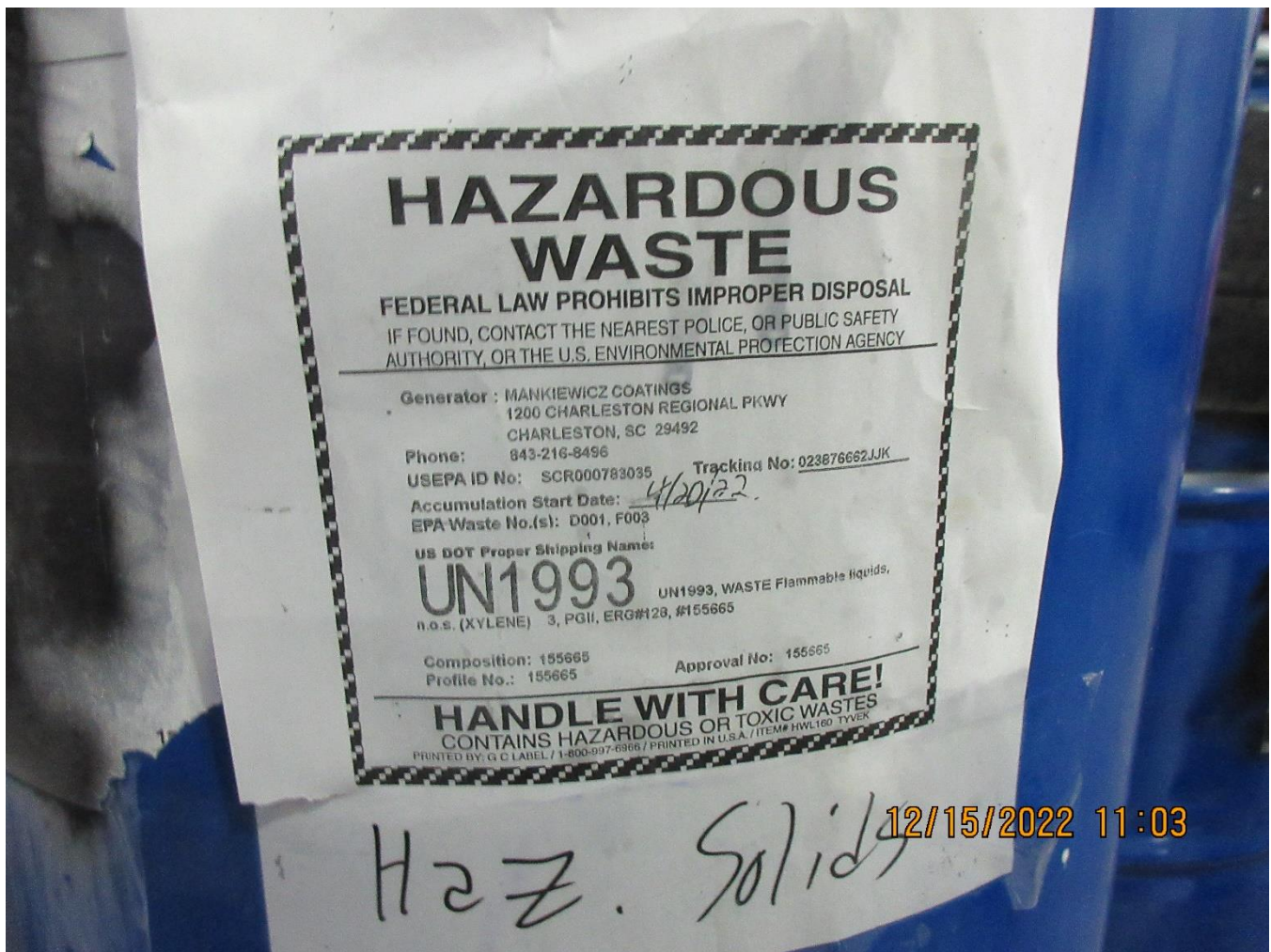


Photo 21 – Date on drum of hazardous waste solids on right side of pallet as shown in Photo 18.



Photo 22 – 15-gallon container of hazardous waste liquids in central area of cleaning area w/o an accumulation start date.



Photo 23 – Drum of hazardous waste solids and crushing device along the southern wall of the Cleaning Area.



Photo 24 – Sign attached to device used to crush hazardous waste solids into drum along the southern wall of the facility's Cleaning Area.



Photo 25 – Top of drum of hazardous waste solids and crushing device along the southern wall of the Cleaning Area.



Photo 26 – Two drums of hazardous waste ignitable liquids on the FB2 pallet rack position

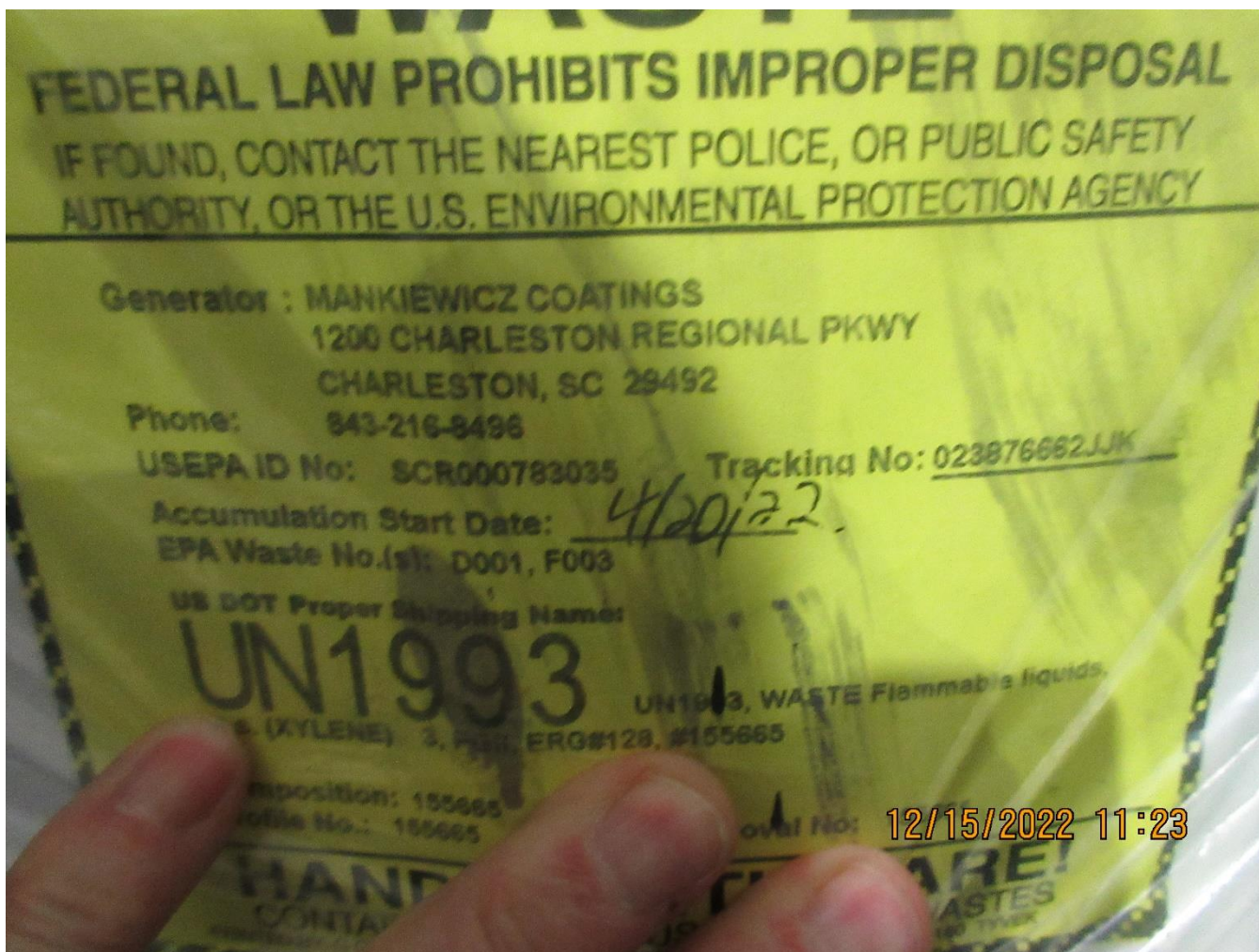


Photo 27 – Label on one of two drums shown in Photo 26



Photo 28 - Label on second of two drums shown in Photo 26



Photo 29 – FB3 Pallet includes black and blue drum on pallet in background and black drum on right in foreground.



Photo 30 – FB5 Pallet includes four 55-gallon drums



Photo 31 – Lid ajar on FLD drum on Pallet FB5



Photo 32 – Bung missing on RLD drum on Pallet FB5



Photo 33 – Label on each drum in B5 pallet position



Photo 34 – Drum of Hardener with bulging lid in BRD drum position on pallet B4.



Photo 35 - Drum of Hardener with compromised lid in FLD drum position on pallet B4

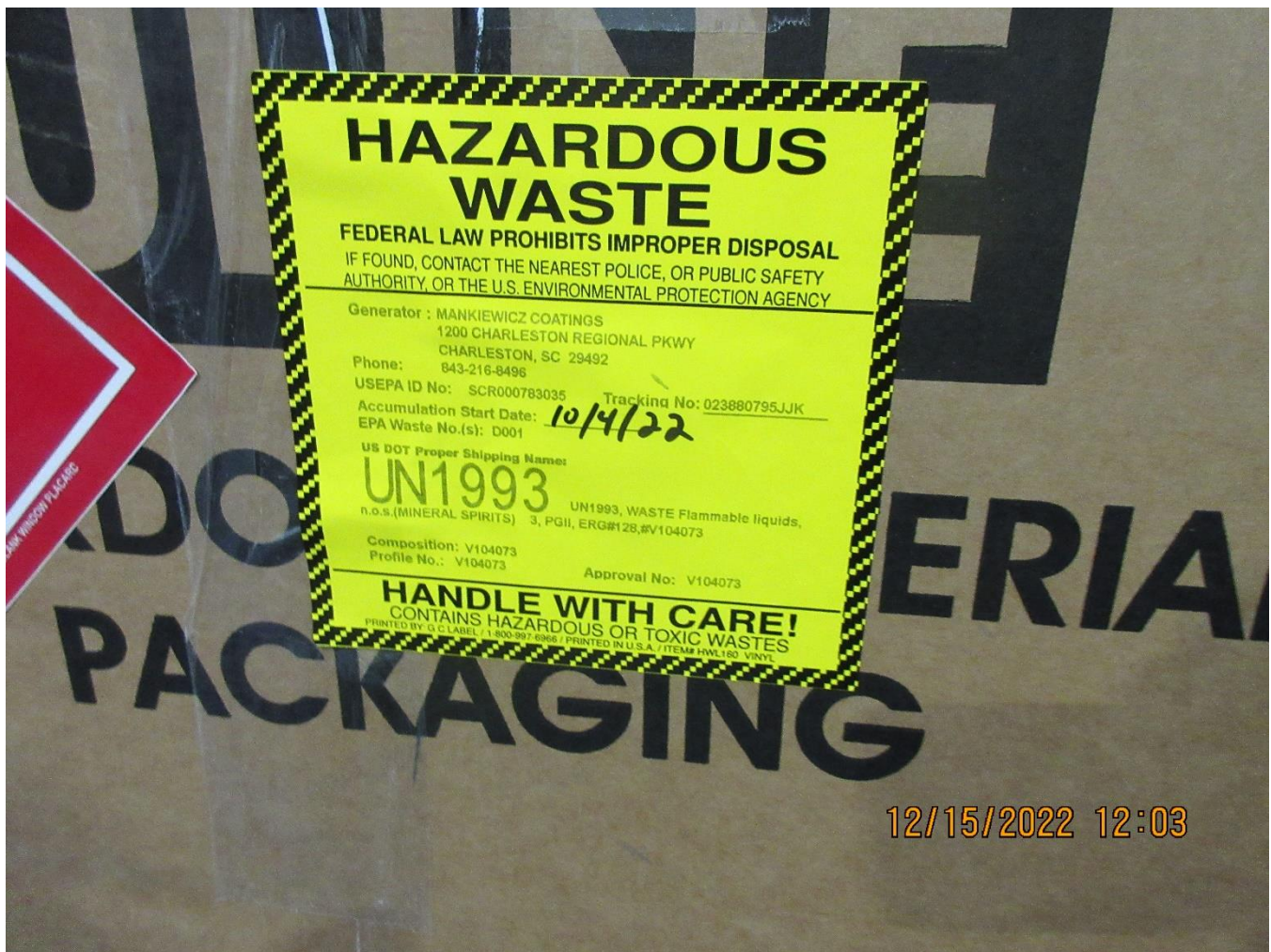


Photo 36 – Label on cubic yard box in B3 pallet position



Photo 37 – Box in B3 pallet position

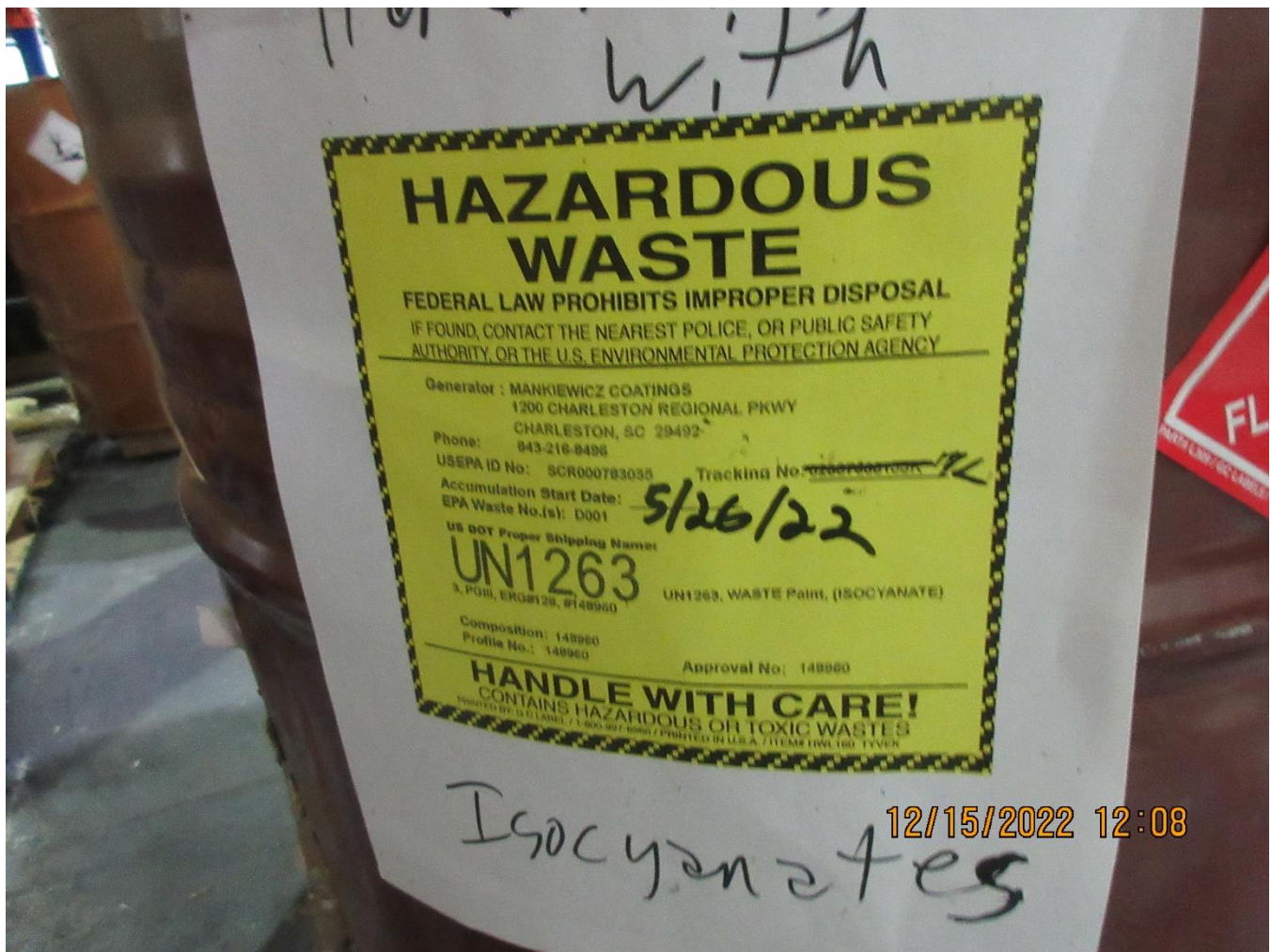


Photo 38 – Label on drum in BLD drum position on pallet in B2 position

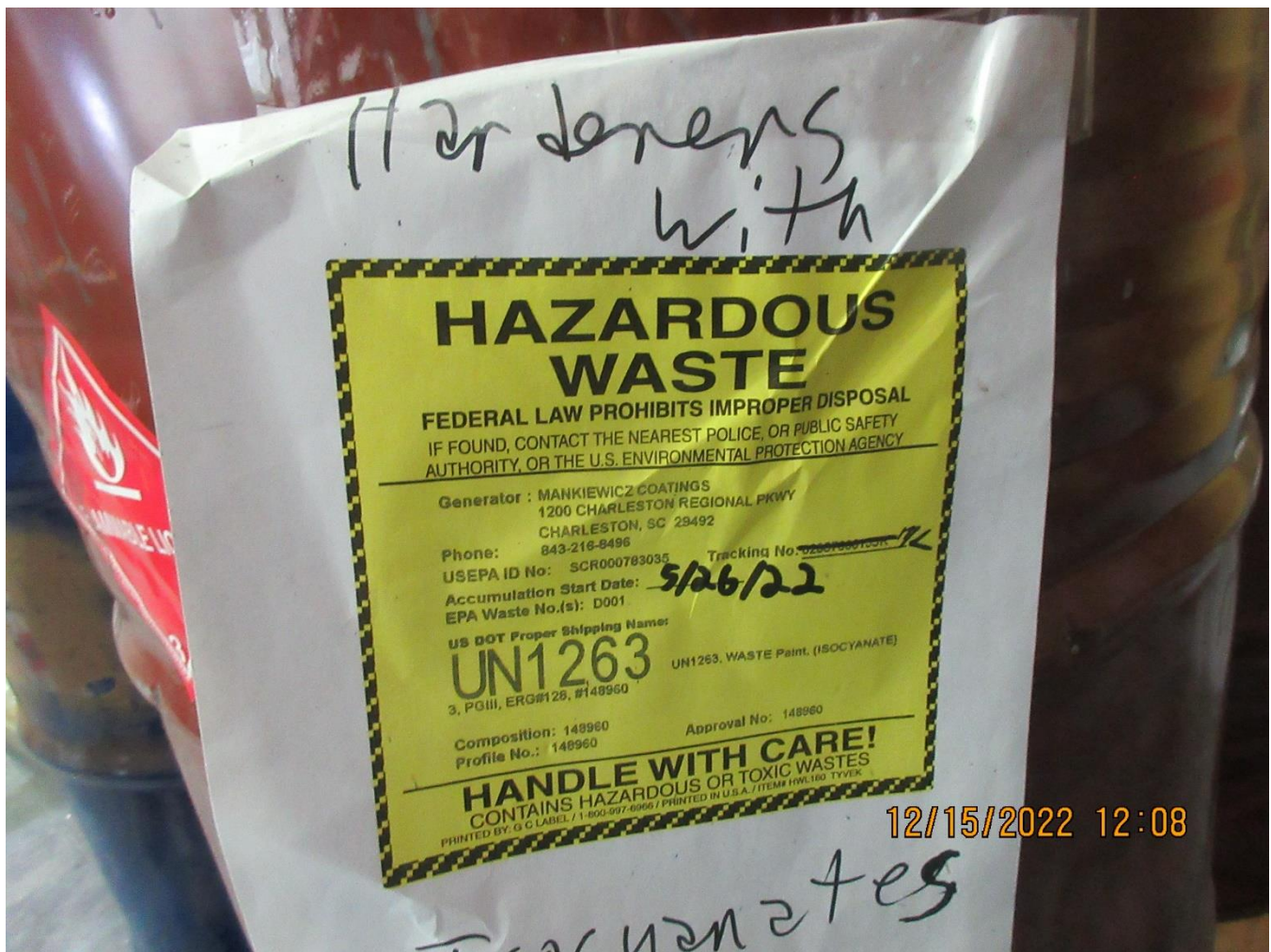


Photo 39 - Label on drum in BRD drum position on pallet in B2 position



Photo 40 – Contents of drum in FRD drum position on pallet in B1 position



Photo 41 - Contents of drum in BLD drum position on pallet in B1 position



Photo 42 – Label on all four drums on pallet in M1 pallet position

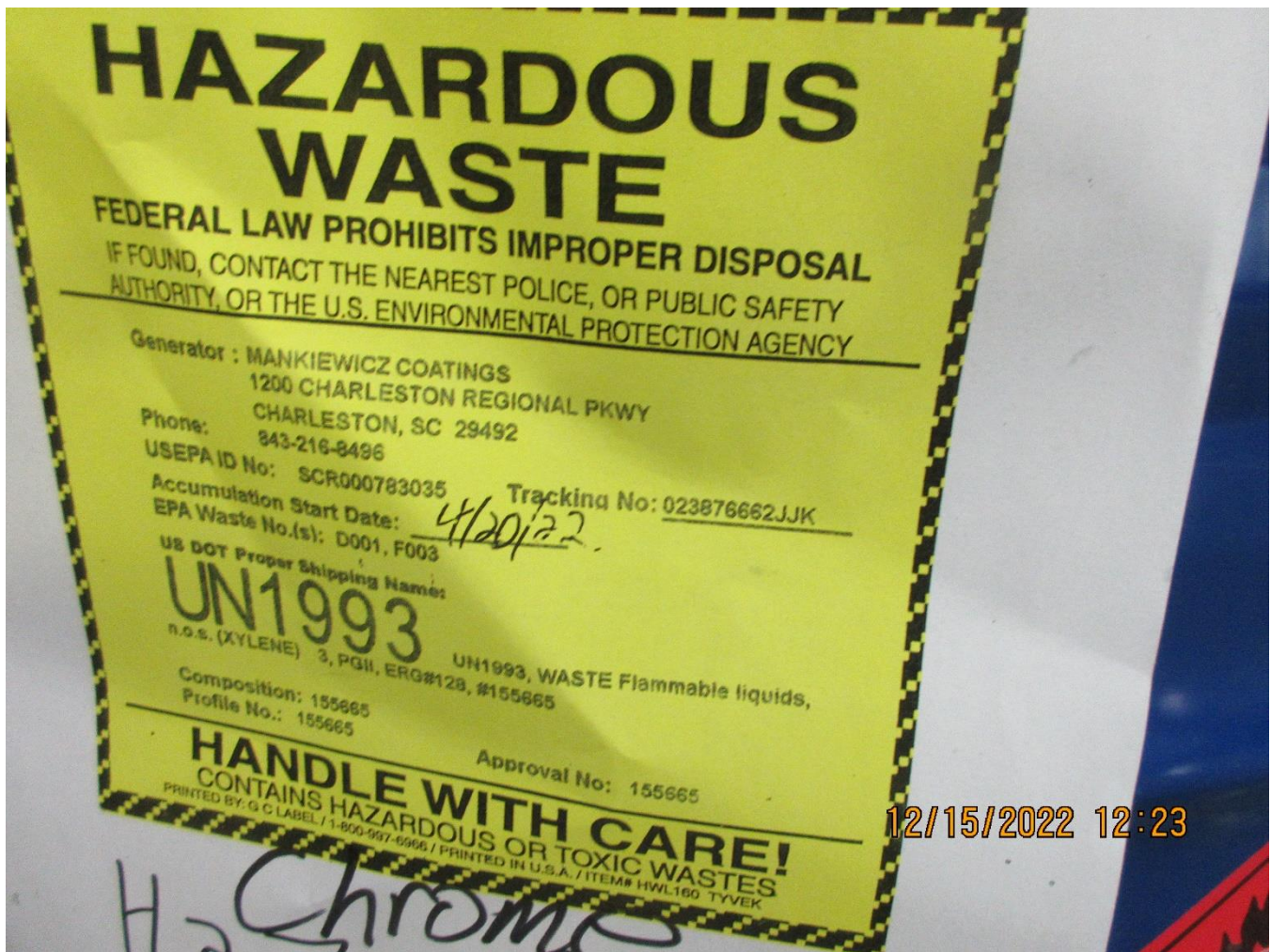


Photo 43 – Label on drum in the FRD drum position on pallet in the M2 pallet position



Photo 44 – Top of drum in FRD drum position on pallet in M3 pallet position

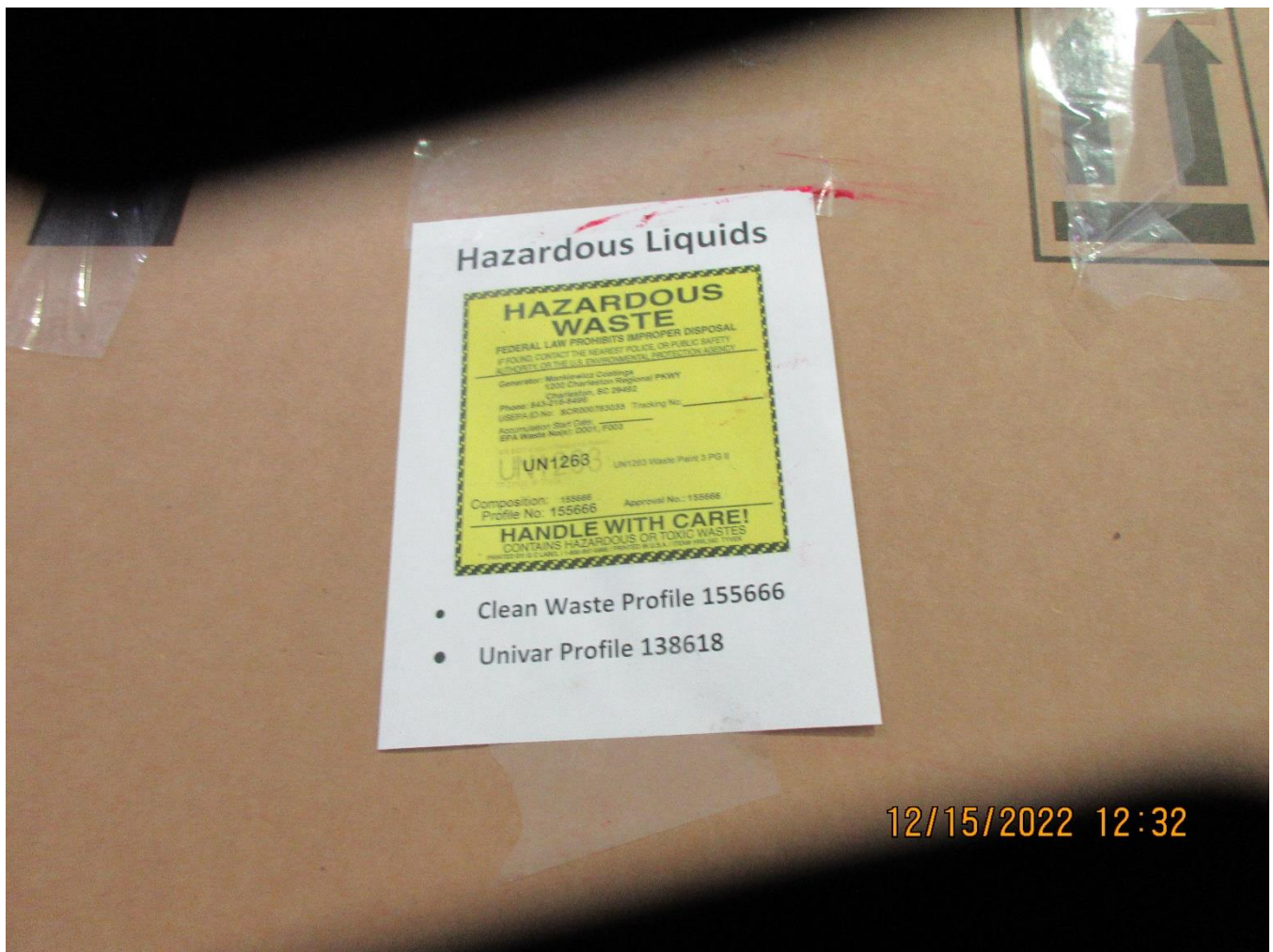


Photo 45 – Label on Box in M4 pallet position



Photo 46 – Three drums on pallet in M5 pallet position



Photo 47 - Bung missing on bulging drum in BLD drum position on pallet in T2 pallet position



Photo 48 - Bung missing on bulging drum in BLD drum position on pallet in T2 pallet position



Photo 49 – Drums on pallet in T2 pallet position. Bung missing on bulging drum in BRD drum position on pallet in T2 pallet position



Photo 50 - Bung missing on bulging drum in BRD drum position on pallet in T1 pallet position

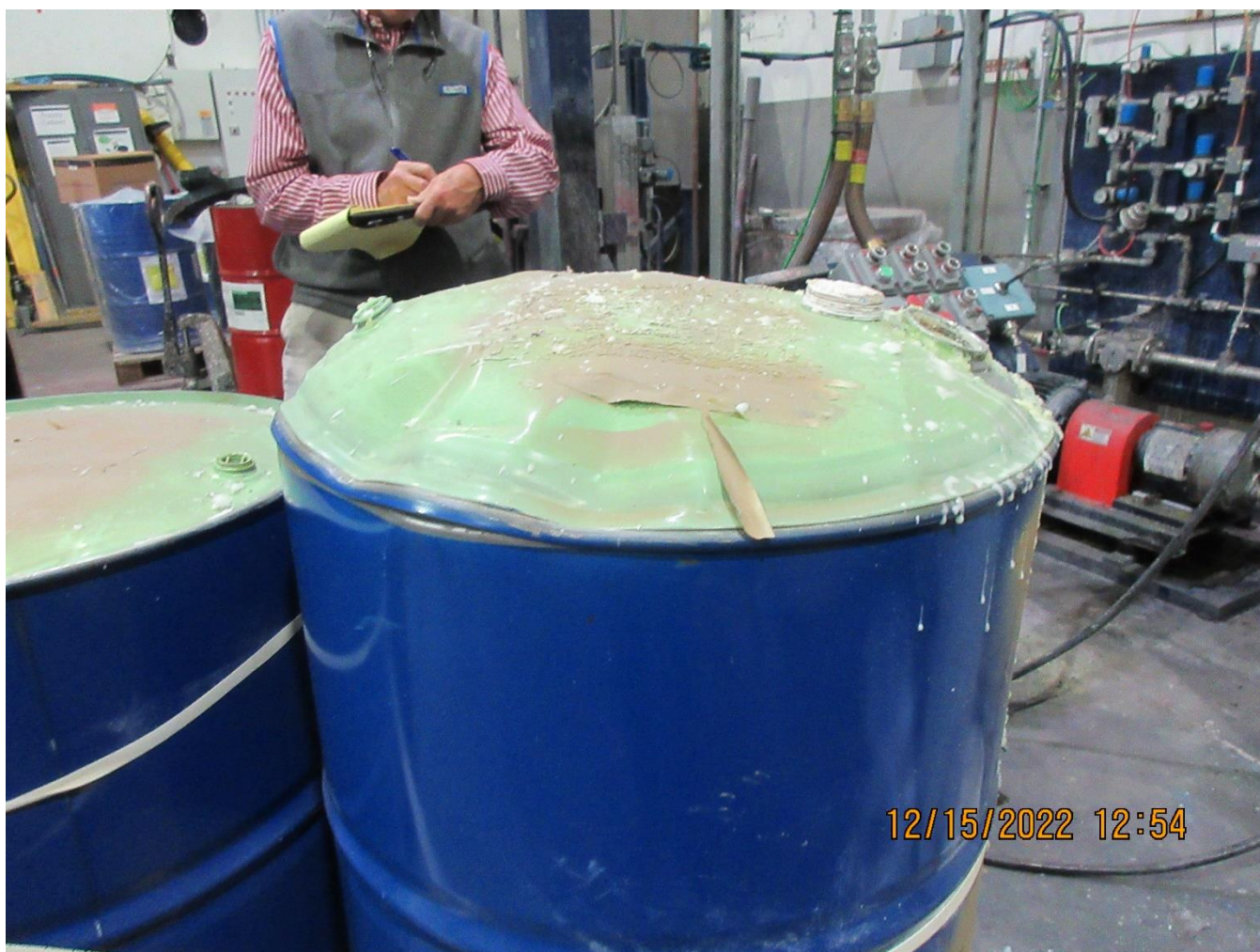


Photo 51 - Bung missing on bulging drum in BRD drum position on pallet in T1 pallet position

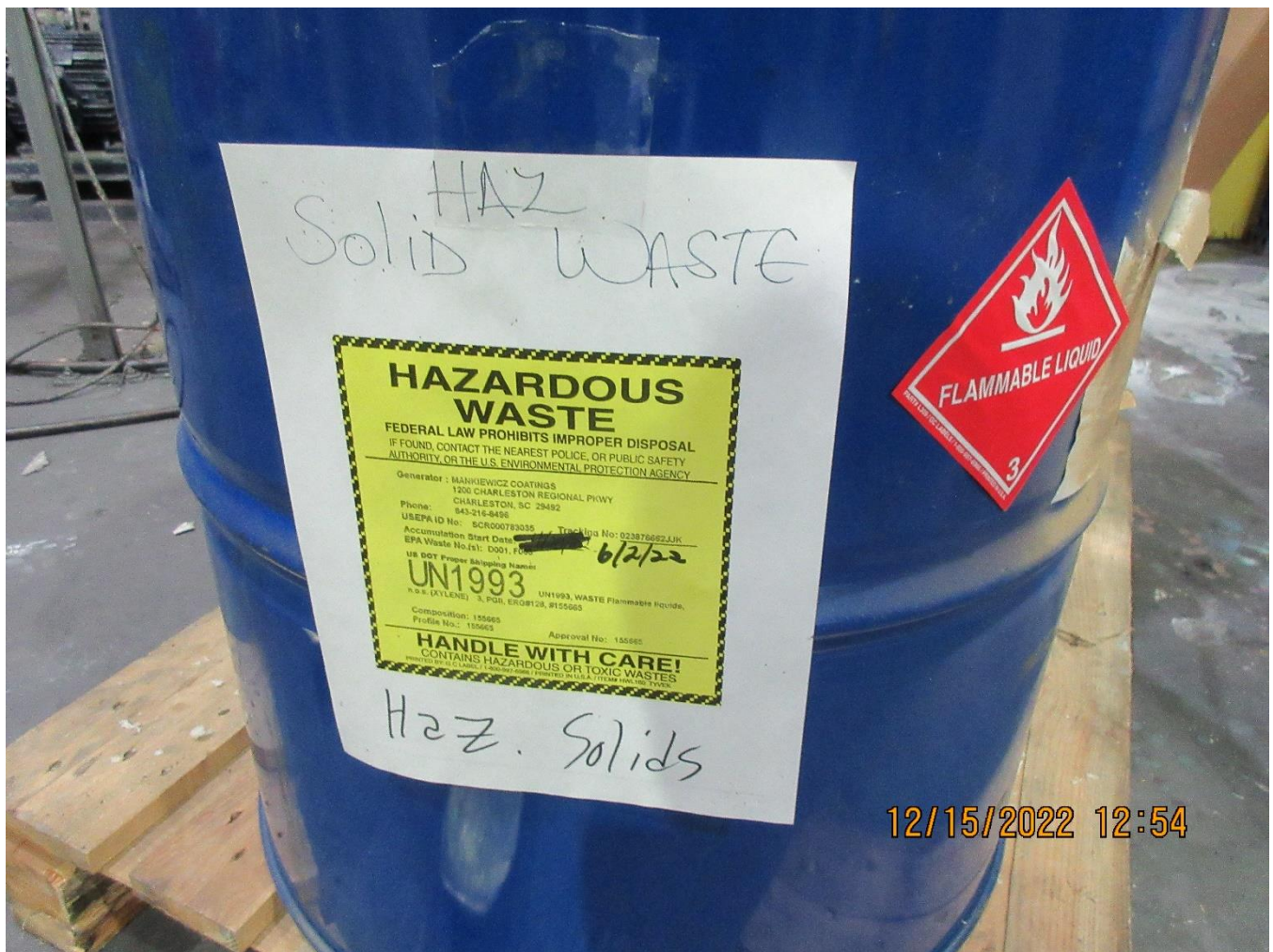


Photo 52 – Label on drum in FRD drum position on pallet in T1 pallet position



Photo 53 – Drums in SAA in Metallic Area



Photo 54 – Funnel with no latch on 55-gallon drum in Metallic Area



Photo 55 – Photo of Cleaning Area from SE corner of the area



Photo 56 - Photo of Cleaning Area from SE corner of the area



Photo 57 - Photo of Cleaning Area from SE corner of the area

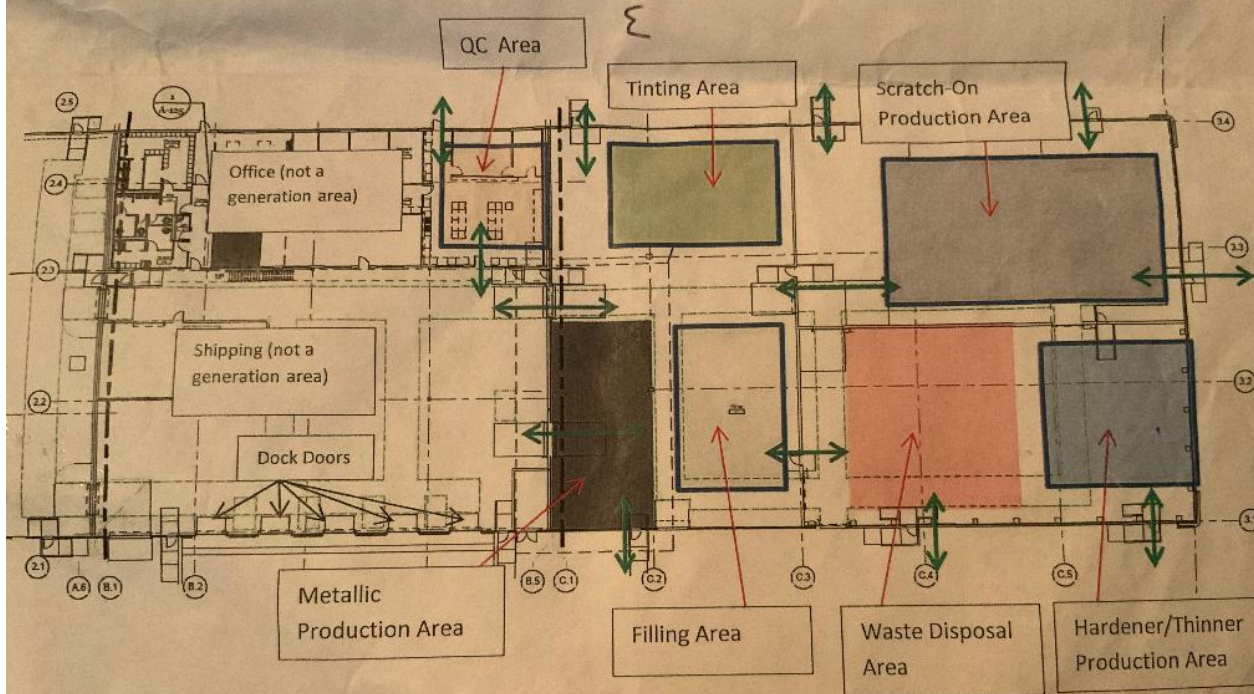
ATTACHMENT B

Mankiewicz Coatings LLC

Charleston, South Carolina

Facility Map Provided at time of CEI

IV. Facility Map - Location of the Generation, Accumulation, and Treatment Areas of Wastes:



- Accessing routes shown with a green arrow.