

RCRA Inspection Report

1) Inspector and Author of Report

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

2) Facility Information

Murakami Manufacturing, USA, Inc.
575 Water Tower Bypass
Campbellsville, Kentucky 42718

EPA ID#: KYR000033001
NAICS #: 33639 – Other Motor Vehicle Parts
Manufacturing

3) Responsible Officials

Lee Bishop
Environmental Health & Safety
Manager
Lbishop@murakami-usa.com

4) Inspection Participants

Lee Bishop, Murakami Manufacturing,
USA, Inc.

Brian Schrader, KDEP
Scott Gerstner, KDEP
Kayla Acosta, USEPA

5) Date of Inspection

August 2, 2023, at 9:00 AM

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; Kentucky Revised Statutes Title XVIII, Chapter 224, Subchapter 46-Hazardous Waste *et seq.* (2006), and Title 401 of the Kentucky Administrative Regulations (K.A.R.) Chapters 30 through 38, 43 and 44 (2006)

Pursuant to 401 KAR 39:005, Section 1 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to 401 KAR 39:080, Section 3(1) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

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 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by KRS § 224.46-520 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 401 KAR 39:080 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in KAR 39:080, Section 1(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 401 KAR 39:080, Section 1(1) [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 KRS § 224.46-520 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 401 K.A.R. 39:060, Section 3(1) [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in 401 K.A.R. 39:060, Section 3(1) [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Murakami Manufacturing, USA, Inc.’s (known hereinafter as “Murakami” or “the facility”) compliance with the applicable requirements of RCRA and the corresponding Kentucky regulations. This was an EPA lead inspection.

8) Facility Description

Murakami is a subsidiary of Murakami Corporation, which was founded over 135 years ago. Its headquarters are based out of Shizuoka, Japan. Murakami Corporation is a provider of automotive safety visibility systems.

The facility in Campbellsville, KY specializes in manufacturing exterior sideview mirrors for the automotive industry. Mirrors are formed from plastic pellets that are injected and molded into shape, fired in ovens, and then painted electrostatically. The paint system is flushed between colors which contributes to most of the hazardous waste generated onsite. The facility has a rinse system (water wall) that cleans the mirror molds as they are being manufactured. The rinse water is re-circulated through a machine called CentraSept. The CentraSept filters the water from the water wall and the sludge drops out into a bin. This enables the rinse water to be used for longer periods of time. The rinse water and the resulting sludge waste are nonhazardous. The facility used TestAmerica for hazardous waste determinations on the rinse water, sludge from the CentraSept machine, and paint-related waste. Murakami manufactures on average 10,000-12,000 exterior sideview mirrors per day for various automotive manufacturing companies.

Murakami began operations in 2001 in its 200,000 square foot facility. The facility operates two shifts with one department operating three shifts 24 hours a day, seven days a week. There are currently 350 employees working at the facility.

The facility first notified of its regulated waste activities on 09/12/2002 as a Small Quantity Generator (SQG) of hazardous waste. On 06/16/2003 the facility submitted its notification of regulated waste activities as a LQG of hazardous waste and most recently notified as a LQG on 09/21/2022. The following waste streams with associated EPA waste codes are generated at the facility: D001 (paint-related waste) and D035 (methyl ethyl ketone). The facility also generates universal waste fluorescent bulbs and universal waste batteries.

9) **Previous Inspection History**

KDEP has conducted three RCRA CEIs at the subject facility between 2018 and 2023 and found no violations during those inspections. The most recent inspection was conducted on 06/27/2022.

10) **Opening Conference**

On August 2, 2023, EPA inspector, Kayla Acosta, accompanied by KDEP inspectors Brian Schrader and Scott Gerstner, arrived at Murakami at approximately 9:00 AM. Lee Bishop, Environmental Health & Safety Manager, immediately received the inspectors. The inspectors conducted an opening conference with Lee Bishop. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA 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.

Lee Bishop provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) **Inspection Observations**

Universal Waste Storage Area:

Murakami manages universal waste fluorescent bulbs and universal waste batteries in a designated area within the manufacturing building. The inspectors observed the following universal waste:

- Five containers of universal waste lamps, closed, labeled Universal Waste, and dated 11/6/2022, 12/2/2022, 01/05/2023, 02/24/2023, and 05/03/2023 (Photos 1-3).

- One container of universal waste batteries, labeled Universal Waste and dated 11/14/2022. The container was not closed with a lid; however only used batteries that show evidence of leakage, spillage, or damage are required to be closed pursuant to 40 C.F.R. § 273.13(a)(1). There appeared to be no evidence of leakage, spillage, or damage to universal waste batteries in the container (Photo 4).

Paint Department:

There are three paint booths that are designated for primer, base coat, and clear coat respectively (Photo 5). Murakami manages a satellite accumulation area (SAA) in the Paint Department by Paint line 3 for paint-related waste and non-hazardous sludge. The inspectors observed the following hazardous wastes in the Paint Department:

- One (1) 55-gallon container of paint waste. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazards of the contents (Photo 6).
- One (1) 55-gallon container of excluded solvent-contaminated wipes. The container was closed, labeled “excluded solvent-contaminated wipes” (Photo 7). Accumulation date is tracked through a monthly inspection sheet to ensure facility is not storing excluded solvent-contaminated wipes past the 180-day storage limit pursuant to 40 C.F.R. § 261.4(b)(18)(ii).

Chemical Storage Room with 90-Day Central Accumulation Area (CAA):

Murakami manages a hazardous waste CAA in the Chemical Storage Room which is an enclosed room located inside of the manufacturing building. The area was identified with signs which read “Caution, Hazardous Waste Area.” The facility manages ignitable waste in the CAA, and the inspectors observed “No Smoking” signs throughout the facility (Photo 8).

The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, and spill control equipment, and it is equipped with automatic sprinklers (Photos 9, 10, and 11).

The inspectors observed the following hazardous wastes in the CAA:

- Seven (7) 55-gallon containers of hazardous waste (Photo 12). All containers were closed, labeled with the words “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated. The oldest accumulation date was 07/27/2023.
- One (1) 55-gallon container of excluded solvent contaminated rags to be sent for disposal (Photo 13). The container was closed and labeled “Excluded Solvent-contaminated Wipes”. The accumulation start date is tracked via a monthly inspection check list.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s Contingency Plan, which was last updated on 07/07/2020. The plan describes actions

facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with local emergency responders. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Lee Bishop is listed as the primary emergency coordinator, and Angie Miller is listed as the alternate.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes. A copy of the Contingency Plan (and its quick reference guide) was most recently submitted to Campbellsville Fire Department, Campbellsville Police department, Taylor Regional Hospital, Taylor County LEPC, Kentucky Emergency Response Commission, KDEP, and Taylor County Sheriff's Office via certified mail with mail receipts dated 09/21/2022.

The quick reference guide includes the types/names of hazardous waste and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names for employees handling hazardous waste. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. The facility provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training with the most recent training held on 06/19/2023.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2020. Hazardous waste manifest records show that (D001/ D035) paint-related waste, is routinely shipped to Reclaimed Energy (EPA ID IND000780403) in Connersville, IN, and the most recent shipment was made on 07/27/2023.

Universal waste is sent to Superior Industrial Solutions in Hickory, TN and used oil is sent to Superior Indianapolis in Indianapolis, IN.

Weekly Inspection Records:

The inspectors reviewed available records of inspections of the hazardous waste central accumulation area (CAA) since 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The records include the number of containers, condition of containers including evidence of leaks, the date and time of the inspection and the name, and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log. Last weekly inspection was on 07/31/2023.

Waste Determinations:

Murakami uses TestAmerica to conduct hazardous waste determinations for their paint waste, water from water wall, and sludge from water wall system via analytical testing. The last TCLP tests were conducted in 2013. It highly recommended that the facility re-test their waste streams especially if there is any change to paint products or the process.

Annual Reports:

Annual reports were available for review. Last annual report was dated 09/21/2022 with no apparent issues.

13) Closing Conference

The inspectors conducted the exit meeting with Lee Bishop. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Lee Bishop stated the facility will be re-testing their waste streams within the year to have a more current analysis.

14) List of Appendices

Appendix 1 – Photo Log:

15) Signed

KAYLA ACOSTA

Digitally signed by KAYLA
ACOSTA

Date: 2023.09.13 16:08:41 -04'00'

Kayla Acosta
Physical Scientist

16) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.09.14 11:07:09 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Appendix 1 – Photo Log

[#13] Photos taken on: August 2, 2023

Photos taken by: Kayla Acosta

Photos taken with: iPad

EPA Property Tag: N/A



Photo 1: Universal Waste – Fluorescent Lamps



Photo 2: Universal Waste – Fluorescent Lamps



Photo 3: Universal Waste – Fluorescent Lamps



Photo 4: Universal Waste –Batteries



Photo 5: Side mirrors being painted in paint booths.

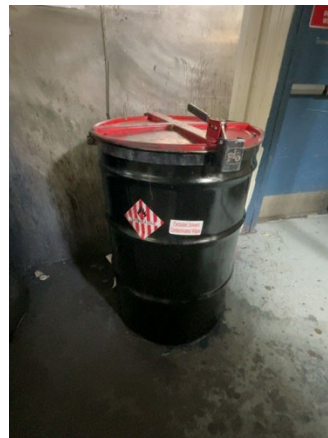


Photo 6: Excluded Solvent-Contaminated Wipes near Paint Line 3.



Photo 7: SAA—Hazardous Waste Paint-related Waste



Photo 8: No Smoking signs located throughout facility.



Photo 9: Fire alarms and extinguishers located in CAA and throughout facility.



Photo 10: Spill control equipment located in CAA.

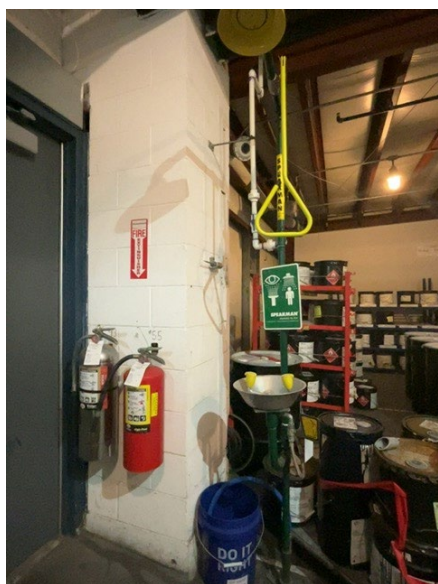


Photo 11: Shower stations and sprinkler systems located in CAA.



Photo 12: 90-Day CAA. All containers were closed, labeled, marked with an indication of the hazard of the contents, and dated.



Photo 13: One (1) excluded solvent-contaminated wipes container in CAA.