

RCRA Inspection Report

1) EPA Inspectors and Authors of the Report

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2) Facility Information

Tiffin Motorhomes, Inc. – Belmont Facility
16-4 Industrial Road
Belmont, Mississippi 38827
Tishomingo County
EPA ID#: MSR000101931
NAICS: 336213 – Motor Home Manufacturing

3) Responsible Official

Tracy D. Gordon
Environmental, Health, and Safety Director
(Mississippi and Alabama)
Tiffin Motorhomes, Inc.
Phone: (256) 356-8661

4) Inspection Participants

Josh Stacey, Plant Manager, Tiffin Motorhomes – Belmont Facility
Tracy D. Gordon, Environmental, Health, and Safety (EHS) Director, Tiffin Motorhomes
(Mississippi and Alabama)
Thomas Stanphill, EHS Coordinator, Tiffin Motorhomes – Belmont Facility
Raj Aiyar, U.S. EPA Region 4, Inspector
Robert Nakamoto, U.S. EPA Region 4, Inspector
Brad Justice, P.E., Mississippi Department of Environmental Quality (MDEQ), Compliance and
Enforcement Lead, Inspector

5) Date of Inspection

December 14, 2022, at 9:35 a.m.

6) Applicable Regulations

Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt.
3, R. 1.1-1.24

Section 17-17-1 *et seq.* of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.*

Section 17-17-27 of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 the 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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4), and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Tiffin Motorhomes’ compliance with the RCRA and the State of Mississippi’s regulations. This was a joint inspection with MDEQ with EPA in the lead of the inspection.

8) Facility Description

Tiffin Motorhomes has been in business for approximately 50 years, and makes Allegro motorhomes, a brand known for high quality. Tiffin Motorhomes Inc., Paint Facility, is in Belmont, Mississippi, about six miles west of their Red Bay headquarters. Tiffin Motorhomes was recently purchased by Thor Motorhomes on December 18, 2020, and the facility continues to operate under the Tiffin Motorhomes brand name.

Tiffin Motorhomes currently has approximately 175 employees working at the Paint Facility. The Paint Facility operates one shift Monday through Friday, 6:00 a.m. to 2:30 p.m., and consists of seven buildings on approximately 40 acres. The previous property owner was Belmont Homes, a house trailer manufacturer. Tiffin Motorhomes bought some of the Belmont Homes property and began operations in 2004. The seven buildings on site are (1) Paint Shop, (2) Sanding Building, (3) Wire Shop Building, (4) Flooring and Ceiling Build Building, (5) Tile Shop, (6) Warehouse, and (7) Guard Shack. The facility has approximately 250,000 square feet under roof. The Paint Building is approximately 107,250 square feet in area, not including the north wing (Final Finish Wing). The Paint facility began operations in April 2004. A Title V permit was issued June 21, 2006. In addition to painting, this facility performs miscellaneous operations such as floor construction. The facility also has a Minor General NPDES Permit.

Currently the process of building a motorhome takes approximately two weeks. The Red Bay facilities in Alabama either purchase a chassis directly from a vendor or build a chassis depending upon their customers requirement. The body work comprising of fiberglass sides and

roof is added to the motorhomes. Tile floors are constructed at the Belmont facility, then shipped to Red Bay, Alabama for installation. Once the motorhome is built and primed out, it is shipped back to Belmont facility for washing, sanding and painting purposes. Once the motorhome is washed and sanded, the motorhome is staged for painting at the west end of the Paint Building. The Paint Building comprises of nineteen paint booths including a training booth (for new operators). The Paint Building's north wing has a touch-up booth. Some of the booths are mainly used for drying purposes, and others are used for sanding purposes.

After leaving the main Paint Building, the motorhomes are sent to the Final Finish Wing where awnings are added. Upon the completion of the final finish, the motorhomes are shipped back to the Red Bay facilities for Quality Control checks. The motorhomes are brought back to the Belmont facility for another cycle of wash, before sending it to the east end of the Paint Building for passing it through a different line of paint booths. The motorhomes go through another functional check at the Belmont facility before going to the Final Paint Repair, then to the Final Finish. After the outside of the motorhome is sealed, the motorhome gets a thorough inside cleaning, before being tarped for storage prior to delivery to a motorhomes dealer. Current production is approximately around ten units per day depending upon the delivery and supply chain inventory.

Tiffin Motorhomes is a large quantity generator (LQG) of hazardous waste, a used oil generator, and a small quantity handler of universal waste. The quantity of hazardous waste generated in 2022 was approximately 22,000 kg, in 2021, it was approximately 31,000 kg. These waste streams are generated from the production process. Tiffin Motorhomes generates four (4) primary hazardous waste streams. All hazardous wastes are stored in containers for the purpose of storage and disposal. There is no hazardous waste stored in tanks.

9) Previous Inspection/Compliance History

The facility was last inspected by MDEQ on July 18, 2017. Five violations were cited related to marking hazardous waste container, marking solvent-wipe containers, dating solvent-wipe containers, updating emergency coordinators, and missing weekly inspections.

10) Findings

Opening Conference

The inspection team (Raj Aiyar, Brad Justice, and Robert Nakamoto) arrived on site at approximately 9:35 a.m. The inspection team was met by Tracy Gordon, the EHS Director for Tiffin Motorhomes, and Thomas Stanphill, the EHS Coordinator for Tiffin Motorhomes–Belmont Facility. The inspectors conducted a formal introduction, showed their credentials, and stated the purpose of the inspection. Tracy Gordon and Thomas Stanphill provided the inspectors a general description of the on-site activities at the site. The inspectors later discussed the scope of the inspection including location of the sites where hazardous wastes are generated, safety protocols, CBI, and the recordkeeping requirements. The inspectors were later accompanied by Tracy and Thomas during the walk-through inspection of the facility.

Site Walk-Through

The inspection team began the tour in the Sanding Building. In the Sanding Building vehicles' fiberglass exteriors are sanded to prepare the fiberglass surface for painting. This sanding process produces sanding dust from the sanding of the motorhomes prior to painting. Each of the handheld sanding units has a hose feeding into a vacuum system (Photograph 1). This dust is captured in the filtration system via the hose and piped to a collection point (Photograph 2). Tiffin Motorhomes has determined that the collected dust is a nonhazardous waste. The sanding dust is collected in 55-gallon containers (Photograph 3). The dust is collected in the capture system. The capture system is emptied into 55-gallon drums. Some containers remained labeled with old "Solvent excluded rags" labels. The inspection team stated that old incorrect labels should be removed from the containers containing sanding dust and filters from the handheld sanding devices as part of container management and marking requirements.

There was a layer of fiberglass dust on the floor. The inspection team noticed some fiberglass dust in the water drainage ditch outside of the building (Photograph 4). Some fiberglass dust was tracked outside of the dust system (Photographs 5, 6, and 7).

The inspection team then went to the Tile Shop. The floors for the motor homes are assembled here and then shipped to Red Bay for assembly into the chassis. The production process for the floors was explained by Josh Stacey.

A water jet is utilized in cutting the tiles. The water from the water jet is recycled and the solids are captured along with the wastewater sludge (Photograph 9). The sludge was noted as a waste stream requiring a waste determination. The workers in the Tile Shop use an apparent solvent free parts washer to clean their tools. The wash bay is also located in this area and the wastewater is discharged to the sanitary sewer. The motor home is washed prior to sanding. Emergency contact information was posted on the door. After the inspection analytical data was sent to the inspection team confirming that the sludge was a non-hazardous solid waste.

The next area visited was the Paint Building. The inspector observed a 55-gallon drum mounted with a can puncturing device in a satellite accumulation area (SAA). The SAA drum was inside a steel cabinet. The SAA container was marked with the words "Hazardous Waste". The label on the drum although visible was partially torn. There was no clear indication of hazard on the SAA container. The inspector recommended the facility personnel to put the hazard indication label such that it was clear and visible.

Pursuant to Title 11 of the Mississippi Annotated Code Part 3, Chapter 1, Rule 1.3 [40 C.F.R. Part 262.15(a)(5)]: a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the 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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Code Pt. 1, Ch1, Rule 1.3 [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 11 Miss. Code Pt. 1, Ch1, Rule 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Code Pt. 1, Ch1, Rule 1.3 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Title 11 of the Mississippi Annotated Code Part 1, Chapter 1, Rule 1.3 [40 C.F.R. Part 262.15(a)(5)]: A generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

During the walk-through the issue of the hazardous waste determination on the facility’s paint filters was discussed. Tracy Gordon briefed the inspectors on guidance that they had received on the topic of hazardous waste determinations for paint filters. The inspection team stated that this issue would be evaluated after the inspection to review guidance on the issue and the analytical results.

The inspectors then went to a satellite accumulation area for the paint related waste. The satellite areas were labeled Hard Plastic and Paint Liners. The bags of the hard plastic and paint liners are compacted at the Compactor unit. These 55-gallon hazardous waste containers were not labeled with the words “Hazardous Waste” and did not have the required hazard indication label (Photograph 10).

Pursuant to Title 11 of the Mississippi Annotated Code Part 3, Chapter 1, Rule 1.3 [40 C.F.R. Part 262.15(a)(5)]: A generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors observed another excluded solvent rag container (Photograph 8) then went to the Paint Kitchen and Paint Shop areas. Industrial Finishes (located in Belmont – the main office for

Industrial Finishes is in Portland, OR) operates the paint kitchen. Crushed cans are collected for scrap metal.

The next area visited by the inspection team was the paint mix room. In this room the paint is mixed on-site for painting the motorhome vehicles. Tiffin Motorhomes has a paint process to accommodate the painting, with decorative paint patterns, for upper end motorhomes. In this room the paint is mixed in batches. The inspectors experienced a strong odor of the paint in this room. In response to an inquiry regarding the strong odor from the paint, Tracy Gordon mentioned that the paint room was not under negative pressure and that the paint room was not equipped with a close-vent system and a control device designed and operated to reduce the total organic content in the paint room. The inspectors observed one 55-gallon SAA drum used for collecting hazardous waste. The drum was observed to be open at the time of inspection. The drum was missing the drum bung lid. The inspectors observed that the drum bung hole was open. The drum was observed to be unmarked with no hazard indication (Photographs 15 -16).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.11 [40 C.F.R. § 265.31], facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep satellite accumulation containers closed except when adding, removing, or consolidating waste or for temporary venting.

Pursuant to Title 11 of the Mississippi Annotated Code Part 1, Chapter 1, Rule 1.3 [40 C.F.R. Part 262.15(a)(5)]: A generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Liquid paint waste was also being collected in three 5-gallon buckets. The buckets were open, and no lids were in the area (Photographs 13, 14, 17 and 18). All four containers were opened at the time of the inspection. The inspection team asked the operator how often the 5-gallon buckets were emptied into the 55-gallon container. It was stated that the 5-gallon buckets were emptied into the 55-gallon SAA drum a few times per year; that is, approximately once every four months. The paint technician briefed that the 55-gallon drum was moved to the Central Accumulation Area (CAA) up to approximately four times per year. Given the large amount of paint being mixed per day, the lack of lids in the area, the very strong odor, and the very infrequent emptying of the containers, it appeared that a significant amount of material was evaporating. Besides concerns about emissions to the atmosphere, open containers of volatile organics in an enclosed space are a potential health and safety concern. The containers were covered before the inspectors left the site. The SAA drum was labeled before the inspectors left

the site.

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A generator may accumulate up to 55-gallons at a satellite accumulation point. It appears that Tiffin Motor Homes may exceed 55-gallons based upon the 55-gallon drum and the three (3) 5-gallon buckets that contain hazardous waste. Tiffin should implement a procedure to ensure that they do not exceed 55-gallons in this satellite accumulation area or to consider the 55-gallon drum area as a central accumulation area.

The inspectors then went to the next SAA at the topcoat operation; the container is kept in a flammable container. Excluded solvent contaminated rags are also kept in this area. The final SAA was near the Touch Up booth. The inspectors then concluded the tour at the Central Accumulation Area (CAA) for hazardous waste (Photographs 20, 21, 22, and 23). The actual area was empty due to a recent shipment. Two drums of hazardous waste had arrived at the CAA since the inspectors arrival (Photographs 24 and 25). Both drums were labeled with hazard indication. The accumulation start date for both the drums was observed to be 12/14/2022. The CAA is equipped with spill control and clean up equipment, including oil dry. The inspectors then returned to the office to complete the records review and left the CAA.

Records Review

Tracy Gordon had arranged the records for our review upon our arrival back at the environmental office. The inspection team (Brad Justice, Raj Aiyar, and Robert Nakamoto) reviewed the following records.

Waste Determinations – The inspectors reviewed the waste determinations for Tiffin. The inspectors asked for copies of records after the inspection, and updated information was provided

on December 14, 2022, January 3, 2023, and January 12, 2023, for tile cutting sludge, paint booth filters, and the silicone and tar remover.

A critical question was if the paint booth filters were a listed hazardous waste or not. Paint Booth Filters, if used solely as air pollution control devices, will typically not become a listed hazardous waste as they are filtering uncontained gases and air flows, unless the filters are sprayed with waste paint or spent solvent waste during operations or while cleaning the paint guns. However, if a facility is spraying waste paint or spent solvent waste into filters during changeover or cleaning, the paint filters will typically acquire any associated hazardous waste listings. Tracy Gordon briefed that Tiffin Motorhomes is cleaning the paint guns outside of the paint booths and they reported that they are not spraying the filters with waste paint or spent solvents. Rather the filters are kept dry except for routine moisture during use from functioning as air filters for air pollution control. Based on the analytical data submitted and reviewed, and observations during the site inspection that supported Tiffin Motorhomes' waste determination, the paint booth filters are not a hazardous waste and can be properly managed as solid waste.

Hazardous Waste Manifests – The Hazardous Waste Manifests for 2019 through 2022 were available and reviewed on-site during the inspection. The LDR notification is included with the manifests. No discrepancies with hazardous waste manifests were identified.

Weekly Inspections – Tiffin uses an electronic application for weekly inspections of the CAA. TracyGordon printed out the weekly inspections for 2022 and the inspectors reviewed those records on-site during the inspection.

RCRA Contingency Plan – The contingency plan for Tiffin Motorhomes was available for review. The plan was dated 2017 but had been updated and included some updated information. It was undergoing an update at the time of the inspection and a copy of the QRG was provided on January 12, 2023.

RCRA Training – The RCRA training records for hazardous waste personnel were reviewed. The training was included in our review. Job Titles were included in the plan, and it was noted that updated job descriptions will need to be included in the updated contingency plan.

Annual Reporting – The annual report for 2021 was available and reviewed. No discrepancies in annual reporting were identified.

Waste Minimization – Tiffin has updated their waste minimization plan and it is going to be updated along with the contingency plan. No discrepancies were identified during the review of the waste minimization plan.

11. Summary

- 1) The inspection team conducted the exit meeting with facility team (Tracy Gordon and Thomas Stanphill) presenting the preliminary results of the inspection. The observations made during the inspection were discussed. There two main issues that were discussed included the release of fiberglass dust to the environment and issues in the paint mixing room in terms of the open containers, unlabeled and unmarked containers, fumes, and ventilation.

- 2) It is recommended that the uncontained fiberglass dust issue be addressed, as soon as feasible, as it is a potential environmental and worker safety issue. The release of fiberglass dust into the drainage ditch and outside of the room are a concern. Fiberglass dust is a potential health risk for anyone working in the room.
- 3) It is recommended that monitoring of air quality in the paint mix room, due to the small size of the room and the large amount of materials mixed, be conducted to confirm that there are no health or safety issues.

12) Signed

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL AIYAR
Date: 2023.03.13 08:54:03 -04'00'

Raj Aiyar
Environmental Engineer

Date

**ROBERT
NAKAMOTO** Digitally signed by ROBERT
NAKAMOTO
Date: 2023.03.08 21:53:41
-05'00'

Robert S. Nakamoto
Environmental Engineer

Date

13) Concurrence

**ARACELI
CHAVEZ** Digitally signed by
ARACELI CHAVEZ
Date: 2023.03.14
15:57:42 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Photographs of Tiffin Motorhomes, Inc. – Belmont Facility
16-4 Industrial Road
Belmont, Mississippi 38827
EPA ID# MSR000101931
Camera Model: Samsung WB250F
By: Raj Aiyar



Photograph 1: Component of Dust Vacuum Unit in the Sanding Building



Photograph 2: Vacuum Unit Room, Seven Empty Containers, Two Drums of Sanding Waste, Dust Has Accumulated on the Floor



Photograph 3: Interior of Sanding Dust Drum



Photograph 4: Drainage Ditch Outside of Vacuum Unit Room



Photograph 5: Outside of Vacuum Dust Room



Photograph 6: Outside of Vacuum Dust Room



Photograph 7: Dust on the Floor and Exterior of the Vacuum Dust Room



Photograph 8: Excluded Solvent Wipes Drum



Photograph 9: Water & Sludge in the Tile Building



Photograph 10: SAA HW Drums Without HW and Without Hazard Labeling



Photograph 11: SAA HW Drum With Partially Obscured Hazard Label



Photograph 12: SAA HW Drum Properly Labeled as Hazardous Waste and Hazard Marking



Photograph 13: Open HW Containers in Paint Mix Room. Containers are not Labeled.



Photograph 14: Second Photograph of Open HW Containers in the Paint Mix Room
Containers are not Labeled as HW Containers and are Missing the Hazard Indication Label.



Photograph 15: Open SAA HW 55-Gallon Drum in Paint Mix Room



Photograph 16: Open HW SAA 55-Gallon Drum That is Not Labeled as Hazardous Waste and is Missing the Hazard Marking



Photograph 17: Third Open HW Container in Paint Mix Room



Photograph 18: Interior of Third Open HW SAA 5-Gallon Container



Photograph 19: Excluded Solvent Wipes 55-Gallon Drum



Photograph 20: Door Entrance to 90-Day (CAA) Area



Photograph 21: Interior of the CAA.



Photograph 22: Interior Picture of CAA Showing Raised Entrance Slope



Photograph 23: CAA Spill Control Kit



Photograph 24: HW 55-Gallon Drum Waiting to be Put in CAA



Photograph 25: Picture of 55-Gallon HW Drum Outside CAA



Photograph 26: Photograph of Completed Motorhomes Showing Custom Paint Patterns.