

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

US Battery Manufacturing Company EPA ID# GAR000022368
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3) Responsible Officials

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4) Inspection Participants

Eric A. Rueter	US Battery Manufacturing Company
Tori Rueter	US Battery Manufacturing Company
Sara Porter	GAEPD
Raj Aiyar	US EPA

5) Date of Inspections

October 17, 2023

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 & 279; Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 *et seq.*, and

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.

Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and Hazardous Waste Permit # HW-26(T&CA)-3

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator (LQG) of hazardous waste 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 Ga. Comp. R. and Regs. 391-3-11-.08(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 Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine US Battery Manufacturing Company’s compliance with the applicable requirements of RCRA and the corresponding Georgia Environmental Protection Division (GAEPD) regulations. This was an EPA lead inspection.

8) Facility Description

US Battery Manufacturing Company (US Battery) operates as a manufacturer of lead-acid batteries utilized in golf-carts, floor scrubbers, man-lifts, and off-the-grid systems. The facility has been in operation at its current location since 2000 and has approximately 120,000 square-feet under roof. US Battery currently employs approximately 250 personnel and operates twenty-four hours for five days a week. The site consists of three buildings that house facility offices, the Oxide Plant, the Battery Plant, Shipping, and a Wastewater Treatment Plant.

Facility Process and Hazardous Waste Generation

US Battery receives “Lead” at their Augusta facility in the form of ingots, which are melted in various reactors to produce lead oxide. Spent lead debris (D008) is generated when the hammer mill breaks up the lead oxide into smaller particles. This process produces hazardous waste in the form of lead-contaminated PPE (D008) and waste lead oxide (D008).

In the Casting department, the spent lead dross (D008) is generated as a byproduct during the lead-melting portion of the grid-casting process. The lead dross is skimmed off the top of the molten lead prior to the lead being poured into the grid-molds. Lead grids are left in the molds to cool, and any excess lead trimmed from the mold is either sent back through the grid-casting process to be re-melted if it is still usable otherwise the excess trimmed lead is managed as D008 waste.

After the grids have cooled, they are sent to the Pasting department where they are glued together into plates by using either anode or cathode paste that is mixed in-house and baked in a flash-dry oven. After the baking process, the plates are sent to Assembly where they are stacked and placed into a curing oven for the lead oxide to activate and be capable of holding a charge. Hazardous waste from the Pasting and Assembly departments are generated in the form of off-spec lead plates, waste paste, and lead-contaminated PPE (D008). Once the plates are determined to be chargeable, the plates are sent to the Finishing department in order to be assembled as batteries. The batteries are enclosed with a plastic casing depending upon the size and voltage before being filled with the sulfuric acid. The hazardous wastes generated in this area are in the form of leaks and weeps of waste sulphuric acid (D002), floor sweepings and lead-contaminated PPE (D008). After the batteries are assembled in the Finishing Department, the batteries are charged and tested for quality assurance and quality control and packaged for shipping.

In its most recent notification of the Biennial Report (BR) dated March 23, 2022), US Battery identified itself as large quantity generator of hazardous waste. The facility has a wastewater discharge permit with Augusta, Georgia Utilities Department effective March 1, 2023, and expires on February 29, 2028. The facility also has an Air Quality Permit (Permit No. 3691-245-0162-S-03-0) issued by GAEPD effective since October 21, 2014. The North American Industry Classification System (NAICS) Code for Battery Manufacturing is 335911. The hazardous waste generated by US Battery is transported by Wiley Sanders Truck Lines Inc. (ALD067120196) to Sanders Lead Company, Inc (ALD046481032) for metals reclamation.

9) Previous Inspection History

US Battery was last inspected by GAEPD on March 28, 2016. There were several violations observed involving container management and universal waste. The Facility returned to compliance on June 16, 2016. There was no prior inspection at this facility.

10) Opening Conference

On October 17, 2023, EPA Inspector, Raj Aiyar accompanied by State Inspector, Sara Porter arrived at the US Battery facility at approximately 9:00 a.m. After checking-in with the security, the inspectors met Tori Ramsey, Environmental Engineering Supervisor who escorted the inspectors to a conference room. The inspectors were joined by Executive Vice President, Eric A Rueter. The inspectors introduced themselves and showed their credentials and stated the purpose of the visit. The inspectors discussed the scope of the inspection including the anticipated use of equipment, a digital camera during the inspection and requested a list of records to be reviewed as part of the inspection.

The Small Business Regulatory Enforcement Fairness Act's (SBREFA) classification of a "small business" is generally set by the Small Business Administration. A copy of the EPA's information

sheet for small businesses can be found <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 facility did not assert a business confidentiality claim.

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

11) Inspection Observations

Oxide Building SAA 1

One 55-gallon satellite accumulation area (SAA) drum of waste lead-contaminated PPE (D008) was observed at the time of the inspection (Photo-1). The container was labeled with the words "Hazardous Waste". The inspectors observed SAA 1 container to be full since D008 contaminated PPE was observed outside the container during the inspection (Photo-2). Hence the container was considered to be open. The hazard indication on the drum was observed to be "Class 9 Miscellaneous Hazardous Material". The label failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near 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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66] [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. §262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

The container was closed during the inspection and on October 24, 2023, EPA and the State received a photo indicating the container was labeled as “Toxic”.

Oxide Building SAA 2

One 55-gallon SAA drum of waste lead-contaminated PPE (D008) was observed at the time of the inspection. The top of the container was labeled as “Lead Contaminated Indigenous Waste”. It was not labeled with the words “Hazardous Waste” and there was no indication of hazards of the contents (Photo-3). The inspectors observed D008 contaminated PPE outside the container. Hence the container was considered to be open (Photo-4).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

The container was closed during the inspection and on October 24, 2023, EPA and the State received a photo indicating the container labeled as “Toxic”.

Baghouse SAA 1

One 55-gallon D008 SAA baghouse waste drum was observed outside at the time of the inspection. The SAA drum was labeled with the words “Hazardous Waste”. The hazard indication on the drum was observed to be “Class 9 Miscellaneous Hazardous Material” (Photo-5). The baghouse dust collector unit was in operation at the time of inspection. The inspectors observed unknown debris on the top of the container as well as on the concrete floor underneath the 55-gallon hazardous waste drum (Photo-6). One empty 55-gallon drum was also observed near the Baghouse SAA 1 drum. The container was closed and was pre-labeled with the words “Hazardous Waste” and with an indication of the hazard as “Class 9 Miscellaneous Hazardous Material”. The labels on both the drums failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in O.C.G.A. §12-8-62(20) [40 C.F.R. § 261.2], must 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 articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

On October 24, 2023, EPA received photographs of the SAA containers closed, labeled as “Hazardous Waste” with indication of hazard as “Toxic” and dust accumulation removed around the SAA.

Baghouse SAA 2

One 55-gallon D008 SAA baghouse waste drum was observed outside at the time of the inspection. The SAA drum was labeled with the words “Hazardous Waste”. The hazard indication on the drum was observed to be “Class 9 Miscellaneous Hazardous Material”. The baghouse dust collector unit was in operation at the time of inspection. The inspectors observed unknown debris on the top of the container as well as on the concrete floor underneath the 55-gallon hazardous waste drum (Photo-7). One empty 55-gallon drum was also observed near the Baghouse SAA 2 drum. The container was closed and was pre-labeled with the words “Hazardous Waste” and with an indication of the hazard as “Class 9 Miscellaneous Hazardous Material”. The labels on both the drums failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in O.C.G.A. §12-8-62(20) [40 C.F.R. § 261.2], must 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 articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

On October 24, 2023, EPA received photographs of the SAA containers closed, labeled as “Hazardous Waste” with indication of hazard as “Toxic” and dust accumulation removed around the SAA.

Baghouse SAA 3

One 55-gallon D008 SAA baghouse waste drum was observed outside at the time of the inspection. The SAA drum was labeled with the words “Hazardous Waste”. The hazard indication on the drum was observed to be “Class 9 Miscellaneous Hazardous Material”. The baghouse dust collector unit was in operation at the time of inspection. One empty 55-gallon drum was also

observed near the Baghouse SAA 3 drum. The container was closed and was pre-labeled with the words “Hazardous Waste” and with an indication of the hazard as “Class 9 Miscellaneous Hazardous Material”. The labels on both the drums failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photographs of the SAA containers closed, labeled as “Hazardous Waste” with indication of hazard as “Toxic” and dust accumulation removed around the SAA.

Wastewater Treatment Filter Press SAA

The Filter Press was not in operation at the time of inspection. There was one 55-gallon SAA drum in the Filter Press Area (Photo-8). The 55-gallon drum was observed to be closed, labeled with the words “Hazardous Waste” and with hazard indication as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA drum failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photograph of the SAA container closed, labeled as “Hazardous Waste” with indication of hazard as “Toxic”.

Pasting SAA 1

One 55-gallon SAA drum of lead solids (D008) was observed at the time of the inspection. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA D008 waste drum failed to reflect the specific hazard associated with the waste.

The drum with a metal lid cover that allowed for negative pressure venting was observed to be warped and prevented the drum lid from being closed at all times during accumulation (Photo-9). As a result, the drum containing D008 waste was considered to be open.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photograph of the SAA container lid as having been repaired, labeled as “Hazardous Waste” with indication of hazard as “Toxic”.

Pasting SAA 2

The Pasting Area is near the Filter Press. One 55-gallon SAA drum of lead solids (D008) was observed at the time of the inspection. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA D008 waste drum failed to reflect the specific hazard associated with the waste. The drum with a metal lid cover that allowed for negative pressure venting was observed to be warped and prevented the drum lid from being closed at all times during accumulation (Photo-10 and Photo-11). As a result, the drum containing D008 waste was considered to be open.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photograph of the SAA container lid as having been repaired, labeled as “Hazardous Waste” with indication of hazard as “Toxic”.

Casting SAA 1

One 55-gallon SAA drum of lead dross (D008) was observed at the time of the inspection. The container was observed to be without any hazardous waste label and without any hazard indication. US Battery personnel explained that since the lead dross (D008) content was hot, it was difficult to put labels on the SAA container. The inspectors however, observed a sign near the SAA container with the words “Hazardous Waste”. However, there was no indication of hazard.

The drum with a metal lid cover that allowed for negative pressure venting was observed to be warped and prevented the drum lid from being closed at all times during accumulation (Photo-12). As a result, the drum containing D008 waste was considered to be open. The inspectors observed Lead Pot insulation in disrepair (Photo-13) and waste lead (D008) dross on the floor (Photo-14). The matter of Lead Pot insulation in disrepair and lead dross waste on the floor was brought to the attention of the facility personnel during the inspection for the purpose of addressing it.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility 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.

On October 24, 2023, EPA received photographs of the repaired SAA container along with “Toxic” label as indication of hazard and the repaired Lead Pot insulation.

Stacking SAA 1

There was one 55-gallon SAA drum in this area. The container was equipped with a metal lid cover connected to a flexible hose that allowed for negative pressure venting. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA D008 waste drum failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Stacking SAA 2

There was one 55-gallon SAA drum in this area. The container was equipped with a metal lid cover connected to a flexible hose that allowed for negative pressure venting. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA D008 waste drum failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photographs of the SAA 1 and SAA 2 containers with “Toxic” labels as indication of hazards in the Stacking Department.

Assembly SAA 1

There was one 55-gallon SAA drum of lead (D008) solids was observed at the time of the inspection. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA D008 waste drum failed to reflect the specific hazard associated with the waste (Photo-15). The container was equipped with a metal lid cover that allowed for negative pressure venting; however, this cover was an open grate top rather than a solid one (Photo-16). The container failed to keep all the hazardous waste contained inside the container during accumulation.

According to the facility personnel, the grid casting plates are broken on top of the grate and the residual solid lead particles are captured in the container and fine lead dust is captured by negative pressure venting. The inspectors stated that the container was considered to be open in accordance with the RCRA regulations.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Assembly SAA 2

There was one 55-gallon SAA drum of lead (D008) solids was observed at the time of the inspection. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA D008 waste drum failed to reflect the specific hazard associated with the waste. The container was equipped with a metal lid cover that allowed for negative pressure venting; however, this cover was an open grate top rather than a solid one (Photo-16). The container failed to keep all the hazardous waste contained inside the container during accumulation.

According to the facility personnel, the grid casting plates are broken on top of the grate, the residual solid lead particles are accumulated in the container and the airborne lead dust particles are captured by negative pressure venting. The inspectors stated that the container was open.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Cast-On-Strap (COS) SAA 1

There was one 55-gallon SAA drum of lead (D008) solids was observed at the time of the inspection. The container was closed and labeled with the words “Hazardous Waste” but did not have an indication of the hazards of the contents.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Cast-On-Strap (COS) SAA 2

There was one 55-gallon SAA drum of lead (D008) solids observed at the time of the inspection. The container was closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

Used Oil

Used oil is generated intermittently throughout the facility via general facility maintenance. The facility's used oil is stored in the Used Oil Storage Area. Four 55-gallon drums of used oil were observed at the time of the inspection. All the containers were in secondary containment and labeled with the words "Used Oil"; however, two of the containers had open bung holes (Photo-17 and Photo-18). The inspectors recommended the facility personnel to close the containers bung holes to prevent any leaks or accidental spills. Additionally, there was oily residue observed on the lids of the used oil containers.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

Universal Waste

Universal waste lamps are generated intermittently throughout the facility via general maintenance activities. Universal waste lamps are accumulated in the Used Oil Storage Area. No universal waste was observed during the inspection. Universal waste generated by US Battery Manufacturing Company is managed by Veolia Technical Solutions, LLC.

Finishing Line

In this Finish Line, batteries are topped with acids prior to quality testing. The inspector observed a 55-gallon drum of D-limonene (D001) in this area. The safety data sheet (SDS) and label on the container identifies D-limonene as a flammable (D001) material, making the spill as hazardous. There were stains of D001 waste on the sides of the drum as well as on the floor (Photo-19 and Photo-20).

The inspectors observed leaks at the Finish Line Acid Filler Station. The inspectors observed waste soda ash (D001) on the floor outside the secondary containment farther down the Finish Line (Photo-21). According to the facility personnel, soda ash was used to neutralize the acid spill (D002) on the floor. There appeared to be no clean up action initiated after the spill. The facility personnel were not sure as to how long it had been since the spill had occurred.

The inspectors also observed 5-gallon bucket containing waste acid (D002) used for catching acid drips near the Finish Line Acid Filler Station (Photo-22). The container was observed to be open and unlabeled with no indication of hazards.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility 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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photographs indicating that leaks at the Finish Line Acid Filler Station had been addressed, 5-gallon bucket removed from underneath the equipment and the D-limonene container was equipped with a containment tray and the D001 waste spill on the floor was cleaned.

Finishing SAA 1

There was one 55-gallon SAA drum of lead (D008) contaminated PPE was observed at the time of the inspection. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA waste drum failed to reflect the specific hazard associated with the waste (Photo-23).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Finishing SAA 2

There was one 55-gallon SAA drum of waste soda ash (D001) was observed at the time of the inspection. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA waste drum failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photographs indicating that appropriate signage had been added to distinguish between the “soda ash” disposal and contaminated PPE disposal including indication of hazards as “Toxic” for both the Finishing SAAs.

Central Accumulation Area (CAA)

US Battery Manufacturing Company operates CAA, which is located indoors in the Shipping Department. The CAA was equipped with fire suppression equipment and a spill kit.

At the time of the inspection, this CAA contained:

- Fifty-six (56) 55-gallon drums of lead-contaminated PPE
- Forty-eight (48) 55-gallon drums of waste lead solids
- Four (4) 275-gallon containers of lead-contaminated PPE
- Four (4) 150-gallon containers of lead-contaminated PPE

All the containers were stored on wooden and plastic pallets. The containers on floors did not have adequate aisle space (Photo-24). Some of the hazardous waste containers were stored approximately three tier high (Photo-25). The inspectors had difficulty accessing the containers stored on the top shelves. All the containers appeared to be labeled with the words “Hazardous Waste” with accumulation start dates. Some of the labels on the containers were observed to be peeling and there were few that were in disrepair. The indication of the hazards of the contents on all the hazardous waste containers in the CAA were observed to be “Class 9 Miscellaneous Hazardous Material”. The labels on the CAA hazardous waste containers failed to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless

aisle space is not needed for any of these purposes.

Acid Farm

The inspector observed an approximately 30-gallon container of sulfuric acid that served as a primary containment at the Acid Unloading Coupling Point in the Acid Farm located outdoors. The container was located under a roof and inside the secondary containment of the Acid Farm; however, the container did not have a lid. There were no leaks or spills observed near the container. The inspectors recommended a lid be used to cover the container when not in use.

On October 24, 2023, EPA received a photograph indicating that a cover has been added to the primary containment at the Acid Unloading Coupling Point.

Quality Assurance (QA) Battery Dump Cart

The inspectors observed a QA Battery Dump Cart (Photo-26). According to the facility personnel, the QA battery dump cart holds approximately 55-gallons. The QA battery dump cart is used for battery tear down purposes. The D002 spent acid is taken to the wastewater pit and acid is treated and pH adjusted in accordance with the facility's wastewater permit prior to discharging to the City's sewer system.

The container contained spent D002 waste acid during the inspection (Photo-27). The container was covered by a grated top (open). The container holding spent D002 waste acid was unmarked with no indication of the hazards of the content in the container. The inspectors observed a Lead-Acid Battery staged on the grated top of the Battery Dump Cart during the inspection. According to the Facility personnel since the spent D002 waste acid in the dump cart would be sent through their wastewater treatment system for treatment, the contents in the QA battery dump cart were not considered as hazardous waste. The inspectors stated that the contents in the container were spent D002 waste acid at the point of generation and hence the Dump Cart should be closed and labeled with the words "Hazardous Waste" and with an indication of the hazards of the contents as "Corrosive".

Area of Concern for potential excess of 55 gallons: Although US Battery may manage more than 55-gallons 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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Wastewater Treatment

There is one operating wastewater treatment plant onsite at the Facility. The current pretreatment comprises of a filter press, sedimentation removal, neutralization of pH and lead removal prior to discharge to City of Augusta sewer lines. Sludge from the wastewater treatment plant is sent to the filter press for further treatment. Filter cake solids from the filter press are disposed of as hazardous waste (D008).

Burn Box Area

There was one 55-gallon SAA drum at the Burn Box Station. The container had a metal lid cover that allowed for negative pressure venting; however, it had an opening at the front covered with a mesh (Photo-27). The inspectors stated that the RCRA regulations require the containers to be closed at all times during accumulation unless there was any waste added or removed. The container was labeled with the words “Hazardous Waste” with indication of the hazards of the contents as “Class 9 Miscellaneous Hazardous Material”. The label on the SAA D008 waste drum fail to reflect the specific hazard associated with the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

On October 24, 2023, EPA received photographs indicating that new lid was added to completely close the container and the container was labeled with indication of hazards of the contents as “Toxic”.

Record Review

Once the inspectors completed the walkthrough of the facility, the inspectors were escorted to a conference room to conduct a review of the required documentation. The records reviewed for a three-year period (2022-2022) included the following:

- Contingency Plan and Quick Reference Guide
- Personnel Training
- Weekly Hazardous Waste Inspection Log
- Hazardous Waste Manifests
- Waste Profiles
- Biennial Report
- Hazardous Waste Reduction Plan
- Documents showing emergency arrangement with local authorities
- Pretreatment Permit with City of Augusta, Georgia effective March 2023
- State of Georgia Air Quality Permit effective October 21, 2014

Hazardous Waste Manifests

The facility maintains hard copies of the manifests as well as eManifest. All signed copies of the manifests are maintained electronically.

Quick Reference Guide (QRG)

The QRG was missing street map of the facility in relation to surrounding businesses, schools, and residential areas.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262 (b)(5)], the quick reference guide and as a condition of the LQG Permit Exemption should include a street map of the facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evacuate citizens and workers.

On October 24, 2023, EPA received a letter and a copy of the QRG indicating that a street map of the facility has been included as part of the QRG.

Arrangements with Local Authorities

There were no records provided indicating that an attempt was made to make arrangements with the local authorities including local police department, fire department, other emergency response teams, emergency contractors, equipment suppliers and Local Emergency Planning Committee.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.256], and is a condition

of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

Personnel Training

The training records failed to include the names and job titles for each position at the Facility related to hazardous waste management.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, 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.

On October 24, 2023, EPA received a letter indicating that names of the personnel handling hazardous waste have been added to the Contingency Plan.

12) Closing Conference

An exit briefing was conducted at the conclusion of the inspection. Eric A. Rueter, US Battery, Tori Ramsey, US Battery, Sarah Porter, GAEPD and Raj Aiyar, US EPA participated during the exit briefing. The observations made during the inspection were discussed and the inspection was concluded. Based on the inspection, the facility appeared to be operating as a large quantity generator of hazardous waste.

13) Signed

RAJAGOPAL AIYAR

Digitally signed by RAJAGOPAL AIYAR
Date: 2023.12.13 08:27:08 -05'00'

Raj Aiyar
Environmental Engineer

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.12.13 12:23:46 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Date

Attachment A
Photographs of US Battery Manufacturing Company
EPA ID# GAR000022368
By: Sara Porter, GAEPD



Photo-1 Oxide Building SAA 1



Photo-2 Oxide Building SAA 1



Photo-3 Oxide Building SAA 2



Photo-4 Oxide Building SAA 2



Photo-5 Baghouse SAA 1



Photo-6 Unknown Baghouse Dust



Photo-7 Unknown Baghouse Dust



Photo-8 Filter Press SAA



Photo-9 Pasting SAA 1



Photo-10 Pasting SAA 2



Photo-11 Pasting SAA 2



Photo-12 Casting SAA 1



Photo-13 Lead Pot Insulation



Photo-14 D008 Waste Dross Waste on the Floor



Photo-15 Assembly SAA 1



Photo-15 Assembly SAA 1
and Assembly SAA 2



Photo-16 Used Oil Storage



Photo-17 Used Oil Labeling



Photo-18 D001 Waste Spill



Photo-19 D-Limonene Label



Photo-20 Waste Acid (D002) Spill



Photo-21 Open 5-gallon D002 Pail



Photo-22 2 55-gallon Finish SAs



Photo-23 CAA Inadequate Aisle Space
and Class 9 Hazard Indication



Photo-24 CAA Hazardous Waste
Containers on top tier of the Steel Shelf



Photo-25 QA Battery Dump Station

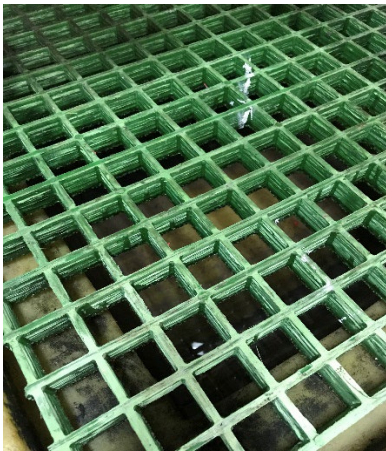


Photo-26 Spent D002 Acid Waste



Photo-27 Burn Box Open SAA Container