

RCRA Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Mercedes-Benz Vans LLC
8501 Palmetto Commerce Parkway
Ladson, South Carolina 29456
Ladson County

EPA ID: SCR000768093
NAICS: 33611 Automobile and Light Duty Motor
Vehicle Manufacturing

3) **Responsible Official**

Russell Revell
Environmental Engineer
Mercedes-Benz Vans LLC
8501 Palmetto Commerce Parkway
Ladson, South Carolina 29456
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4) **Inspection Participants**

Nikki McDill, Mercedes-Benz Vans LLC
Russell Revell, Mercedes-Benz Vans LLC
Abby Miranda, Mercedes-Benz Vans LLC
Allison Raffety, Mercedes-Benz Vans LLC

Ryan Donohue, SCDHEC
Tom Richmond, SCDHEC
Paula Whiting, U.S. EPA Region 4 Atlanta

5) **Date and Time of Inspection**

April 10, 2024, at 9:35 a.m. EDT

6) **Applicable Regulations¹**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 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.

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

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a) [40 C.F.R. § 262.17(a)], a large quantity generator (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(a) [40 C.F.R. § 262.17(a)] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79. 261.4(b)(18)) [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 S.C. Code Ann. Regs. 61-79. 261.4(b)(18)) [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

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 and/or either one quart of liquid acute hazardous waste 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 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 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. 61-79.273.9 [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, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Mercedes-Benz Vans LLC, EPA ID Number: SCR000768093 with the applicable regulations. This was an EPA lead inspection.

8) Facility Description

Mercedes-Benz Vans, LLC (MBV) is a manufacturing plant that includes Body Shop, Paint Shop, and Expanded Assembly in Ladson, South Carolina that assembles Sprinter and eSprinter vans

for the United States and Canadian markets.

MBV provides part by part manufacturing. The parts are received in the warehouse and then sent to the various buildings. The Body Shop constructs and welds the vans with robots. No hazardous waste is generated in this area. From the Body Shop the parts move to the Paint Shop, where they are pretreated via dip tank phosphate bath, galvanized, then sent to the ovens. This process removes the burrs and slags from the parts. The paint on primer oven process, the spot repair, and the paint mix room are where the hazardous waste generation occurs. Univar is the contracted hazardous waste handler for MBV.

The Facility is on 227 acres with 136 acres in production and parking. Mercedes-Benz Vans LLC employs 2,000 employees including contractors who work three 12-hour shifts, five days per week.

Mercedes-Benz Vans, LLC's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 4, 2024, characterized the Facility as a Large Quantity Generator (LQG) of hazardous waste. Mercedes-Benz Vans, LLC may generate hazardous waste streams, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes. The hazardous waste may be designated with one or more of the following EPA Waste Codes D001, D002, D003, D005, D006, D008, D009, D010, D013, D018, D021, D035, F003, F005, U002 and U159.

9) Previous Inspection History

This Facility was last inspected on May 5, 2020, by South Carolina Department of Health and Environmental Control (SCDHEC). Deficiencies of universal waste were noted.

10) Opening Conference

On April 10, 2024, EPA inspector Paula Whiting, accompanied by South Carolina Department of Health and Environmental Control (SCDHEC) inspectors Ryan Donohue and Tom Richmond arrived at Mercedes-Benz Vans LLC at approximately 9:35 a.m. EDT. The inspectors signed in at the front office. Mrs. Nikki McDill, Environmental Engineer, and Mr. Russell Revell, Environmental Engineer, received the inspectors and escorted them to a conference area. The inspectors introduced themselves, showed their credentials to the representatives, and explained the purpose of the visit. Mrs. Abby Miranda, Attorney, and Mrs. Allison Raffety, Attorney, joined the opening conference.

The inspectors described the anticipated use of a digital camera 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 the EPA. The company did not assert a business confidentiality claim.

Mr. Revell and Mrs. McDill 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 representatives led the inspectors on a tour of the Facility operations. Below is a description of the observations made during the inspection.

11) **Inspection Observations**

Assembly

Assembly supplies the trim line parts for the van interiors. This building only has one production line. The inspectors observed a black 55-gallon container of Solvent Paint Contaminated personal protective equipment (PPE), Absorbent Debris and Contaminated Residue, D001, F003, F005 (Picture 1) in the Window Glazing satellite accumulation area (SAA). The container had a red flap lid and sat on secondary containment. The container was closed and labeled, and the secondary containment was clean. No issues were observed in the area.

Rework Area

The inspectors observed a 5-gallon step container labeled Excluded Solvent Contaminated Wipes, C251-0012 Non-Hazardous, Flammable (Pictures 2-3) in the Rework Area. However, the inspectors observed paint contaminated PPE inside the container, which the facility representative confirm was hazardous waste debris. Mr. Revell explained that the hazardous waste contents should have been placed in a SAA.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [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 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].

Outside the Rework Area, was the Touch up Paint Mix Room. Due to the flammable nature of the paint mixing process, cameras and cellphones were not allowed inside this room. Therefore, photos were taken from the doorway. MBV manages two SAAs and an accumulation area for excluded solvent wipes inside. The inspectors observed one 55-gallon container of Paint Waste D001, D035, F003, F005 in the first SAA; one 55-gallon container of Solvent Paint Contaminated PPE, Absorbent Debris and Contaminated Residue, D001, F003, F005 in the second SAA; one 55-gallon container of Excluded Solvent Wipes Non-Hazardous; and a spill kit and an eyewash (Pictures 4-6) in the Touch up Paint Mix Room.

At the time of the inspection, the inspectors observed hazardous waste debris inside the excluded solvent wipe container. MBV employees did not accurately identify the debris as

hazardous waste rather than excluded solvent wipes. The inspectors explained that the solvent contaminated wipes exclusion no longer applied to the container or its contents because hazardous waste was added to the container. Instead, the container was subject to the conditions of the SAA Permit Exemption. The container did not have hazardous label with hazard indication.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [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 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].

Paint Shop Paint Mix Room

Due to the flammable nature of the paint mixing process, cameras and cellphones were not allowed inside this room. The Paint Mix Room had an eyewash and two SAAs. The inspectors observed one 55-gallon container of Hazardous Waste Paint D001, D035, F003, F005 in the first SAA, and one 55-gallon container of Solvent Waste Paint Solids and Debris D001, F003, F005 in the second SAA (Picture 7).

The inspectors observed that a paint gun inside the bunghole of a 55-gallon container located between the two containers in the SAAs. When asked, the inspectors were told that the paint gun hose was connected to the solvent wash. Clean solvent is placed into the container and pumped using paint gun into the solvent wash tank for cleaning equipment.

A 55-gallon container of non-hazardous PVC purge was observed. The inspectors were told that the purge is a caulk that is cured with primer in the oven and used to seal all inside the vans.

Primer Purge Recovery System

At the time of the inspection, a grated secondary containment underneath a pump contained a release of primer paint (Picture 9). Mr. Mark Beckwith, Paint Shop Manager, explained that a recent maintenance repair had occurred, and the staff had yet to clean out the secondary containment. Mr. Beckwith went on to say that the release had happened the day before and they were waiting for it to fully dry before cleaning it up, in an attempt to prevent further mess and release. Drying is considered a form of treatment. Spill response and facility maintenance should be performed promptly.

Pursuant to S.C. Code Ann. Regs. 61-79.262.90 states: A generator must clean up any hazardous waste discharge that occurs during generation or processing or storage and take such other action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6)], [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.251 [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.

In addition, a release of primer on the floor was in the process of being cleaned up. A 5-gallon container with hazardous waste paint debris was observed sitting on plastic and surrounded by absorbent pads (Picture 8). When observed by the inspectors, there was no one actively cleaning up the release and the container was not closed or labeled as hazardous waste.

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.

Paint Shop Maintenance

The Paint Shop Maintenance is an enclosed storage area. The inspectors observed a green SmartWasher® with OzzyJuice®, a red one-gallon container of spent OzzyJuice®, and a red 5-gallon flip can with Excluded Wipes, Flammable Solid (Pictures 10-12). The OzzyJuice® inside the SmartWasher®, is an aqueous-based solution which contains a mixture of pH-neutral emulsifiers and surfactants. This solution is used for parts cleaning. The inspectors noted that the OzzyJuice® had a soapy smell. However, the red one-gallon container labeled “spent OzzyJuice®” observed behind the excluded wipes container (Picture 12) did not have a soapy smell, but a solvent smell, and contained at least one-inch of clear yellow liquid. When the inspectors asked Mr. Beckwith and his staff, no one could identify the contents of the container. Mr. Richmond and Mr. Donohue tested each the OzzyJuice® from the SmartWasher® and the unknown contents of the red container with pH indicator strips. The OzzyJuice® test strip was clear, and the unknown contents test strip was purple which indicates a pH of 12 (basic) (Picture 13). The inspectors stated a hazardous waste determination was needed on the unknown contents of the red one-gallon container.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [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 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].

Mix Room Storage

The Mix Room Storage area was large paint mixing process and raw material storage. Due to the flammable nature of the paint mixing process, cameras and cellphones were not allowed inside this room. The inspectors observed the following:

- A SAA with one closed 55-gallon container labeled hazardous waste PolyPurge 1243 Waste D001, F003, F005, Flammable Liquid with a funnel attached;
- A spill kit and an eyewash;
- One SAA with a closed 55-gallon container labeled hazardous waste Paint Waste Debris D001, F003, F005, and an indication of the hazards of the contents;
- ASAA with one black 55-gallon container of hazardous waste solvent, that was a third full, not closed and not labeled with the words “Hazardous Waste”; and
- Two open mop buckets with dirty paint solvent contaminated water that were not labeled with the words “Hazardous Waste” or 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.

Outside Mix Room Storage was a loading area with a scrap metal bin that contained discarded paint cans that were not RCRA empty (Pictures 14-15). This container was labeled “Scrap Metal Bin” by Mercedes-Benz Vans LLC and contained paint contaminated PPE and many non-RCRA empty paint containers, some of which had drained into the bottom of the container. The inspectors observed waste paint residue released inside the scrap metal bin. According to the waste profile records, MBV has identified waste paint as D001, D035, F003, F005 hazardous waste. Therefore, the inspectors stated that the released hazardous waste paint needed to be cleaned up and the paint residue and non-empty containers needed to be managed as hazardous waste.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [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 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].

Pursuant to S.C. Code Ann. Regs. 61-79.262.90 states: A generator must clean up any hazardous waste discharge that occurs during generation or processing or storage and take such other action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6)], [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.251 [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.

Wastewater Treatment Plant

The Wastewater Treatment Plant generated 25 cubic yard supersacks of Non-Regulated Wastewater Treatment Plant Sludge (C251-0016) (Pictures 16-19). The inspectors observed two supersacks, and discarded cigarette butts inside one of the supersacks. The inspectors made Mr. Beckwith aware of the housekeeping issue. No hazardous waste was observed in this area.

Ultrasonic Waste SAA

Mr. Beckwith toured the inspectors upstairs to observe a SAA for managing hazardous waste ACCRA Strip Solution and an area for managing solvent contaminated wipes. The inspectors observed one 55-gallon container, labeled ACCRA Strip Solution, Toxic, D010, in the SAA; one 55-gallon container, labeled Excluded Solvent Contaminated Wipes, C251-0012 Non-Hazardous, Flammable, in the contaminated wipes accumulation area; and a spill kit (Picture 20). Both containers were sitting on secondary containment pallets, closed, and labeled. No issues were observed.

Building 90

Building 90 is the Charleston Excellence Center where MBV manages a SAA in the 3-D Printing Room. The inspectors observed a 55-gallon container of 3-D Printer Waste, Corrosive, D002 with a yellow funnel and sitting on a secondary containment pallet in this SAA (Picture 21). A yellow spill kit and a 5-gallon container used as transfer bucket was also in this area. No issues were observed.

Less Than 90-Day Central Accumulation Area

The less than 90-day central accumulation area (CAA) is a separate building on campus. The inspectors observed the following (Pictures 22-33):

- A spill cart;
- One fiberboard carton of universal waste lamps, closed, labeled, and dated April 9, 2024;
- One 5-gallon container of universal waste lithium batteries closed, labeled, and

- dated December 6, 2023;
- One 5-gallon container of universal waste nickel-cadmium batteries closed, labeled, and dated January 19, 2024;
- 36 spent lead acid batteries dated January 7, 2024;
- Four 55-gallon containers of hazardous waste, closed, labeled, and the oldest dated April 3, 2024, and the remainder dated April 5, 2024;
- One 55-gallon container of universal waste aerosol containers closed, labeled, and dated April 2, 2024;
- A pallet of dead batteries waiting to be moved to the universal waste area, dated April 9, 2024;
- cartons of C251-0054 Welding Dust Filters;
- Eight totes of C251-0048 Oily Water;
- One 55-gallon container of oily solids; and
- Twelve 55-gallon containers of airbag seatbelt pretensioners, marked as non-hazardous waste, Reactive, to be sent for reclamation.

No issues were observed inside the CAA.

A records review was conducted in the Univar office. The inspectors requested training records, and the waste profiles.

12) **Records Review**

The inspectors requested the training records, the contingency plan, the weekly inspection records, the waste minimization plan, waste profiles, the 2021-2024 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated March 4, 2024.

Training Records

The inspectors requested the training records for the employees handling hazardous waste. Training for Univar employees Stacy Roundtree, Erykiah Talbert, Deontae Williams, and Thomas Wilkins were provided. Mr. Roundtree, Site Leader, received 40-Hour HAZWOPER via eTraining, Inc. on August 24, 2022; The U computer-based training (CBT) module of Hazardous Waste Training on November 1, 2023; RCRA Hazardous Waste Refresher on September 6, 2023; DOT/RCRA/HAZMAT training via EnviroSmart on September 14, 2022; and UnivarSoln Regulated Waste Handling on October 16, 2023.

Ms. Talbert, Site Supervisor, received The U CBT module of RCRA Hazardous Waste Annual Training in 2022-2024; RCRA Hazardous Waste Refresher on March 11, 2024; DOT/RCRA/HAZMAT training via EnviroSmart on July 3, 2023; and UnivarSoln Regulated Waste Handling on January 22, 2024.

Mr. Williams, Material Handler, received The U CBT module of RCRA Hazardous Waste Annual Training on March 6, 2024; RCRA Hazardous Waste Refresher in 2022-2024; and UnivarSoln

Regulated Waste Handling on October 16, 2023.

Mr. Wilkins, Operations Support Specialist, received the UnivarSoln Regulated Waste Management training on January 11, 2022.

The job descriptions for the Univar employees were requested but were not available for review.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: a written job description for each position at the facility related to hazardous waste management.

The inspectors requested the training records for the MBV employees responsible for managing the hazardous waste manifests and records. Training records for Mr. Revell, Mrs. McDill, and Mr. Alan Keith were requested but were not available at the time of the inspection.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv) [40 C.F.R. § 262.17(a)(7)(iv)], 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.

Contingency Plan

The inspectors reviewed the Contingency Plan, dated December 2019, and revised February 2023. The plan did have an emergency contact list, an evacuation map, a fire extinguisher inspection list, a list of emergency response equipment, and documentation (i.e., green return receipt cards, emails) that copies of the current contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital). However, the Quick Reference Guide did not include a map of the facility showing where hazardous wastes are generated, accumulated and treated; a street map of the facility; the locations of water supply; the identification of on-site notification systems; or the name of the emergency coordinator(s).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)(4 through 8)] and is a condition of the LQG Permit Exemption, a large quantity generator that is otherwise

amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements:

- (1) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
- (2) 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;
- (3) The locations of water supply (e.g., fire hydrant and its flow rate);
- (4) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
- (5) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Other Records

The weekly inspection records for 2021-2024 were reviewed. No issues were observed.

The Waste Minimization Plans for 2022-2024 were reviewed. No issues were observed.

Waste profiles were reviewed. The inspectors observed waste profile C251-0084 Welding Dust Filters, dated March 17, 2020; waste profile C251-0048 Oily Wastewater, which is rain collected from a roof; waste profile C251-0075 by OzzyJuice®, which is a flammable solid not labeled as excluded contaminated solvent rags; and waste profile C251-0012 which is excluded solvent wipes in small to big containers. No issues were observed during the review.

Hazardous and non-hazardous manifests were reviewed for 2023-2024. Hazardous wastes were shipped to the following:

- Lighting Resources, LLC (EPA ID TNR 000042119) in Johnson, City, TN
- UnivarSoln Charlotte Plant, NC (EPA ID NCD06263315) in Charlotte, NC
- Tradebe Treatment and Recycling (EPA ID TND000772186) in Millington, TN
- Clean Earth of Calvert City LLC (EPA ID KYD985073196) in Calvert City, KY
- Clean Harbors El Dorado LLC (EPA ID ARD069748192) in El Dorado, AR

The land disposal restriction forms were reviewed.

13) Closing Conference and Follow-up

The inspectors conducted the exit meeting with Mr. Revell, Mrs. McDill, Mrs. Miranda, Mrs. Raffety, and Mr. Weston Cavett, Business Services Manager. During this meeting, the EPA and

SCDHEC presented the preliminary results of the inspection. Mercedes-Benz Vans LLC was inspected as a LQG of hazardous waste.

On May 22, 2024, Mr. Revell emailed the inspectors three Excel spreadsheets with Tasks and Observations with tabs detailing the correction actions taken (see tables below). In addition, attachments included:

- Operator Training for Hazardous Waste Satellite Accumulation Area
- Training for Paint Shop Maintenance Team
- Environmental New Hire Orientation Training
- MBV Environmental Risk Management--Paint Shop Operations & Maintenance
- MBV Hazardous Waste Contingency Plan with the Quick Reference Guide and LEPC Notification Letters

Task No.	Description	Assigned To	Correction Date
Task 1	Excluded Solvent Wipe Red Can - contained foreign debris (Assembly Spot Paint Repair)	Paint Shop	4/11/2024
Task 2	Excluded Solvent Wipe Drum contained foreign debris (Assembly Spot Paint Repair Paint Mix Room)	Paint Shop	4/11/2024
Task 3	Five-gallon bucket with purge paint waste material - no label, unattended (Paint Shop Maintenance)	Paint Shop	4/10/2024
Task 4	Red can with ozzy juice - solvent odor, no label (Paint Shop Maintenance Cage)	Paint Shop	4/10/2024
Task 5	Drum with waste solvent, no lid, no label (Paint Shop Paint Mix Room)	Paint Shop	4/10/2024
Task 6	Mop cleaning buckets contained waste solvent (Paint Shop Paint Mix Room)	Paint Shop	4/10/2024
Task 7	Hopper contained scrap steel cans with paint residue and free liquid (Paint Shop Air Lock)	Paint Shop	4/11/2024
Task 8	Tom Wilkens Job Description / Training Certificates (Univar); copy requested	Facilities	4/11/2024
Task 9	Allen Keith - Training Certificates (Univar Consultant Trainer); copy requested	Facilities	4/15/2024
Task 10	Update Hazardous Waste Contingency Plan - Quick Reference Guide; request updates and re-format	BSF Enviro	5/8/2024
Task 11	Conduct awareness training on topics related to findings and sustainable compliance	BSF Enviro	5/8/2024

Task No.	Description	Assigned To	Correction Date
Observation 1	Update Oil-Water waste profile description	BSF Enviro	4/24/2024
Observation 2	Submit 8700-12 form on an annual basis for Hazardous Secondary Material notification	BSF Enviro	4/11/2024
Observation 3	Drop off waste batteries at Universal Waste Storage Area; pallet load of batteries was in wrong location	Facilities	4/11/2024
Observation 4	Erroneous waste placard posted (Paint Shop Paint Mix Room)	Paint Shop	4/11/2024
Observation 5	Drum with solvent – no label (Paint Shop Paint Spot Repair Mix Room)	Paint Shop	4/24/2024
Observation 6	Request copies of MBV's Environmental Engineer Job Descriptions, Job Titles, Training Certificates	Paint Shop	4/19/2024

14) **List of Attachments**

Attachment A – Photo Log: Mercedes-Benz Vans LLC

15) **Signed**

Whiting, Paula

Digitally signed by Whiting,
Paula
Date: 2024.07.02 09:43:09
-04'00'

for Paula A. Whiting
Environmental Engineer

16) **Concurrence**

BROOKE YORK

Digitally signed by BROOKE
YORK
Date: 2024.07.02 12:44:18
-04'00'

for Alan R. Newman
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

MERCEDES-BENZ VANS LLC
LADSON, SOUTH CAROLINA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

APRIL 9, 2024

Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374



Picture 1 – Assembly Window Glazing SAA



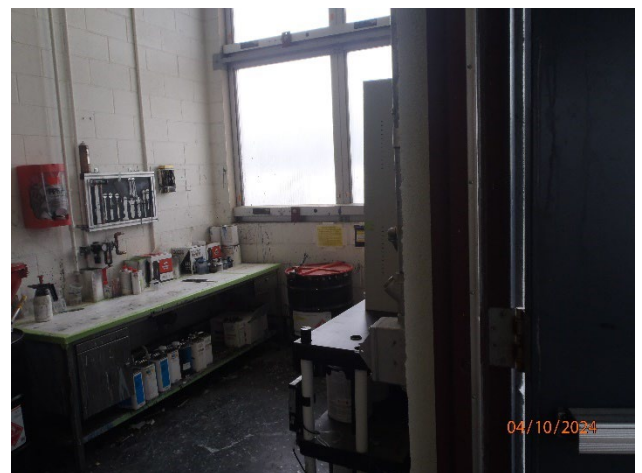
Picture 2 – Rework Area SAA



Picture 3 – Rework Area SAA



Picture 4 – Touch up Paint Mix Room SAA



Picture 5 – Touch up Paint Mix Room SAA



Picture 6 – Touch up Paint Mix Room SAA



Picture 9 – Primer Purge Recovery System secondary containment for pump



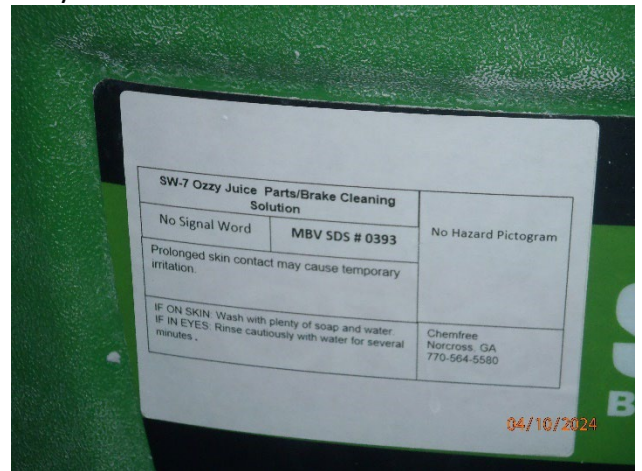
Picture 7 – Paint Shop Paint Mix Room SAA



Picture 10 – Paint Shop Maintenance Ozzy Juice Smart Washer



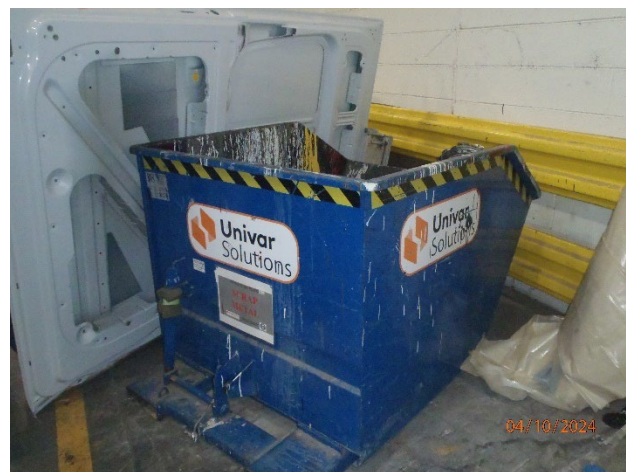
Picture 8 – Primer Purge Recovery System clean up debris



Picture 11 – Paint Shop Maintenance Ozzy Juice Smart Washer label



Picture 12 – Paint Shop Maintenance flip can SAA and spent solvent SAA



Picture 15 – Mix Room Storage scrap metal bin w/discarded HW paint cans



Picture 13 – Paint Shop Maintenance ozzy juice pH strips



Picture 16 – WWTP sludge



Picture 14 – Mix Room Storage scrap metal bin w/discarded HW paint cans



Picture 17 – WWTP sludge with cigarette butts



Picture 18 – WWTP sludge



Picture 21 – Building 90 SAA



Picture 19 – WWTP sludge label



Picture 22 – CAA Universal Waste Storage



Picture 20 – Ultrasonic Waste SAAs



Picture 23 – CAA Universal Waste Storage



Picture 24 – CAA Hazardous Waste Storage



Picture 25 – CAA Hazardous Waste Storage



Picture 26 – CAA Lead Acid Batteries



Picture 27 – CAA non-HW overview



Picture 28 – CAA non-HW overview



Picture 29 – CAA oily water totes



Picture 30 – CAA welding dust filters



Picture 31 – CAA spent air bag

containers



Picture 32 – CAA spent air bag containers



Picture 33 – CAA overview