

RCRA Inspection Report

1) Inspector and Author of Report

William Kappler
Physical Scientist
Enforcement and Compliance Assurance Division
Environmental Protection Agency, Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8498

2) Facility Information

ITW Pro Brands
4647 Hugh Howell Road
Tucker, Georgia 30084
DeKalb County

EPA ID No.: GAD042216549

3) Responsible Officials

Ms. Anna Davis
ITW Pro Brands
4647 Hugh Howell Road
Tucker, Georgia 30084
adavis@itwprobrands.com
(770) 243-8800 ext. 2650

4) Inspection Participants

Anna Davis, ITW Pro Brands
Lee Mayo, ITW Pro Brands
William Kappler, U.S. Environmental Protection Agency, Region 4

5) Date and Time of Inspection

August 14, 2020, at 9:30 a.m.

6) Applicable Regulations

Georgia Hazardous Waste Management Act, as amended, O.C.G.A. § 12-8-60 *et seq.* [Resource Conservation and Recovery Act (RCRA) Sections 3005 and 3007 (42 U.S.C. §§ 6925 and 6927)] and the Georgia Hazardous Waste Management Rules (GHWMR), Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018) [40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279].

As the State's authorized hazardous waste program operates in lieu of the federal RCRA

program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) Purpose of Inspection

On August 12, 2020, the EPA contacted ITW Pro Brands to discuss a RCRA CEI. The EPA procedure is to provide the facility with at least 24 hours-notice prior to the RCRA CEI. The inspector, Mr. Kappler, identified himself, explained the purpose of the RCRA CEI, and the date and time of his arrival. Mr. Kappler explained the health and safety procedures, general areas for inspection, equipment that will be used, and the RCRA records needed for review. ITW Pro Brands representatives identified themselves and explained the facility operational status, health and safety procedures, and record review information. ITW Pro Brands is currently operating. A face mask and social distancing practices are observed at ITW Pro Brands.

After the meeting, an email was sent to ITW Pro Brands to confirm the date and time of the RCRA CEI, along with a business card and a list of the RCRA records needed for review. ITW Pro Brands confirmed the date and time in a reply to EPA's email.

On August 14, 2019, the U.S. Environmental Protection Agency, Region 4, conducted an announced compliance evaluation inspection at ITW Pro Brands, (hereinafter, "ITW" or the "facility") to determine its compliance status with the RCRA and the State of Georgia regulations. This was an EPA-lead inspection. The inspector arrived at ITW and was greeted by Ms. Davis. The inspector introduced himself, showed credentials, exchanged business cards, and explained the purpose of the visit during an entrance briefing. The facility provided a form to the inspector asking to provide self-assessment information on the current health status related to the COVID-19.

8) Facility Description

ITW is located at 4647 Hugh Howell Road, Tucker, DeKalb County, Georgia. The facility has been at this location since 1970 and consists of 5 acres of property. The property is owned by Illinois Tool Works, Inc. The facility employs approximately 60 people. Currently, the on-site staffing level has been reduced to about 50 percent based on the staff's ability to perform job functions remotely. The facility conducts manufacturing operations Monday through Thursday and shipping operations Monday through Friday. ITW's hours of operation are 6:30 a.m. to 5:30 p.m. Monday through Thursday, and Friday 7:00 a.m. to 5:00 p.m. On Fridays the facility may close as early as 3:30 p.m. The facility consists of two building with approximately 86,000 square feet. DeKalb County provides the potable water and domestic waste services. The primary NAICS code for the facility is 325998.

ITW submitted an annual notification of its regulated waste activity to GAEPD on March 2, 2020, identifying as a large quantity generator of hazardous waste (LQG) and a small quantity handler of universal waste (SQHUW).

9) General Process Description

ITW manufactures water-based and oil/solvent-based products used for the maintenance of industrial equipment. The products include lubricants, corrosion inhibitors, hand degreasers, and cleaning wipes. The products are filled in aerosol cans, in 16-ounce spray bottles, in one-gallon,

five-gallon, and 55-gallon containers. A separate manufacturing line packages the individual cleaning wipe product. ITW operates seven filling lines and one clean wipe line.

The products are mixed in two compounding rooms. The solvent and water compounding room contain eight 2,000-gallon vats. The heavy cleaning compounding room contain five 2,000-gallon vats. Once a production run is completed, the filling lines are flushed with mineral spirits and is reused to clean the vats. The mineral spirits are reused until it is determined a waste (“A” waste). The waste mineral spirits are accumulated in a five-gallon container and transferred to a 55-gallon container in the 90-day or less accumulation area by a line operator. ITW also manufactures a specialized product that contains zinc. The filling lines and vat used for this product are flushed with a mixture of acetone and xylene (“C” waste). The waste acetone and xylene are accumulated in a five-gallon container and transferred to a 55-gallon container in the 90-day or less accumulation area by a line operator.

The aerosol can line produces approximately 80 percent of ITW’s products. The aerosol cans are tested in a 130-degree Fahrenheit water bath to check for leaking product. The defective cans are collected and punched in a foot operated puncture device. The recovered product is added back into the line producing that product.

10) Previous Inspection History

ITW was last inspected by the GAEPD on February 22, 2016. The facility was found to have submitted a copy of the contingency plan to a local hospital.

ITW has never previously been inspected by the EPA, Region 4 for compliance with the federal and the State of Georgia hazardous waste regulations.

11) Findings

The information in this RCRA inspection report is based on the EPA’s August 14, 2020, RCRA CEI.

Research and Development Laboratory

Research is conducted on new formulas and on new development operations. The inspector observed one 2.5-gallon container accumulating waste mineral spirits and one 1.5-gallon container accumulating waste acetone and xylene in a fume hood. The containers were closed, labeled with the words hazardous waste, and labeled with a flammable pictogram indicating the hazard of the container contents.

Quality Assurance Laboratory

The products are tested in this laboratory. The inspector observed one 2.5-gallon container accumulating waste mineral spirits and one 2.5-gallon container accumulating waste acetone and xylene in a fume hood. The container of mineral spirits was closed, labeled with the words hazardous waste, and labeled with a flammable pictogram indicating the hazard of the container contents. The container of acetone and xylene was not kept closed and the condition of the hazardous waste label could be read but was beginning to deteriorate. The container was labeled with a flammable pictogram indicating the hazard of the container contents. ITW closed the container and attached a new hazardous waste label on the container, prior to the inspector leaving this area (photographs 1 and 2).

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. § 262.16(b) or §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.

Chemical Compounding Room

In this room the chemicals are mixed in vats and distributed to the lines for packaging in bottles, cans, and containers. Located next to vat number seven and eight the inspector observed one 55-gallon container accumulating waste acetone and xylene. Mr. Mayo determined approximately 20 to 25 gallons of hazardous waste in the container. The inspector observed a funnel inserted in the top opening of the container. The funnel was not kept closed. The container was labeled with the words hazardous waste and labeled with a flammable pictogram indicating the hazard of the container contents. Ms. Davis explained the 55-gallon container should not have been at this location, but in the 90-day or less accumulation area. ITW closed the container, prior to the inspector leaving this area (photographs 3 and 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.

The inspector also observed a 1.5-gallon container accumulating a residue of dried acetone/xylene solids located next to the 55-gallon container. The inspector observed the container was not kept closed and not labeled with the words hazardous waste. The container was labeled with a flammable pictogram indicating the hazard of the container contents. ITW closed and attached a hazardous waste label on the container, prior to the inspector leaving this area. The inspector recommended better housekeeping management practices (photographs 5 and 6).

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 with the words “Hazardous Waste”.

90-Day or Less Central Accumulation Area

The 90-Day or Less Accumulation Area (90-Day Area) is located inside the building in an adjoining room to the manufacturing operation. The inspector observed the following hazardous waste accumulating in the 90-Day Area at the time of the inspection.

Eight 55-gallon containers accumulating waste mineral spirits and trichloroethylene (D001, D040, F001) stacked two high on poly-pallets. The containers were closed, in good condition, labeled with the words hazardous waste, labeled with a flammable pictogram indicating the hazard of the container contents, and marked with dates accumulating less than 90 days. The earliest date observed on a container was May 19, 2020.

Twenty 55-gallon containers accumulating waste acetone, xylene, and trichloroethylene (D040, F001, F003) stacked two high on poly-pallets. The containers were closed, in good condition, labeled with the words hazardous waste, labeled with a flammable pictogram indicating the hazard of the container contents, and marked with hazardous waste accumulation start dates. The earliest date observed on one container was May 14, 2020 (photographs 7 and 8). Ms. Davis explained a staffing shortage at the destination facility was resulting in additional accumulation time to ship hazardous waste off-site during the COVID-19. The EPA’s inspector reviewed the emails exchanged between ITW and the destination facility dated June 26, 2020 and July 29, 2020. Ms. Davis explained ITW would arrange to ship the hazardous waste by Monday, August 17, 2020. On August 17, 2020, Mr. Kappler received an email from ITW with an attached hazardous waste manifest (00275851 GGR), showing the shipment of the hazardous waste containers on August 17, 2020.

The inspector also observed one 55-gallon container accumulating waste mineral spirits. The container was accumulating hazardous waste generated from the manufacturing line. The container was closed, labeled with the words universal waste, labeled with a flammable pictogram indicating the hazard of the container contents, and marked with the date August 7, 2020. Inspectors observed spill control and emergency equipment.

Wastewater Container Accumulation Area

The inspector observed five 250-gallon containers and six 55-gallon containers accumulating wastewater from flushing and cleaning the lines and vats. ITW determine the wastewater as non-hazardous waste. The containers were closed, in good conditions, and labeled with the words non-hazardous waste.

Tank Farm

Chemical products are stored in this tank farm for the manufacturing operation. The tank farm consists of 18 horizontal and vertical tanks constructed within several concrete secondary containment systems. The tanks store isohexane, mineral spirits, acetone, xylene, heptane, carbon dioxide and several refrigerants. Trichloroethylene is received in totes.

Production Meeting Area

Universal waste is accumulated on wooden pallets in this area. The inspector observed three four-foot boxes accumulating universal waste lamps and one 10-gallon container accumulating universal waste batteries. The containers were closed and labeled with the words universal waste. The boxes of universal waste lamps were marked with dates in February, April, and March 2020. The container of universal waste batteries was marked with the date January 21, 2019 (photograph 9). On September 11, 2020, EPA received an email from ITW with an attached invoice 81-02481, showing the container of universal waste batteries was shipped on August 27, 2020.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18, [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) means a universal waste handler who does not accumulate 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18, [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

12) Waste Management Practices

Hazardous waste is generated from the flushing and cleaning of the lines and chemical vats during the manufacturing of chemical products. The facility generates waste mineral spirits, petroleum naptha, waste acetone, waste xylene, and waste trichloroethylene (D001, D040, F001, and F003). Non-hazardous wastewater is generated from the flushing and cleaning of lines and vats during the manufacturing of water-based cleaning products. The hazardous waste is accumulated in a five-gallon container and transferred to a 55-gallon container in the 90-day or less accumulation area by five-line operators. The wastewater is accumulated in 250 to 275-gallon totes and 55-gallon containers and shipped to Environmental Remedies. Universal waste is transported and shipped to Lighting Resources, LLC.

The Group Leader, QC Tech, and Lead Compounder manage the hazardous waste in the 90-day or less accumulation area. The hazardous waste is prepared for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to a treatment, storage or disposal facility (TSDF).

ITW used the following transporters in 2017 through 2020.

Freehold Cartage Inc - NJD054126164
Piedmont Risk Management LLC – GAR000062067
Industrial Waste Solutions – SCR000762245
Heritage Transport – IND058484114
Care Environmental Corp – NJR986651743

ITW used the following TSDF in 2017 through 2020.

Giant Resource Recovery, Sumter Inc - SCD036275626
Clean Harbors El Dorado – ARD069748192
Rineco – ARD981057870

13) Record Review

During the CEI, EPA requested the facility provide hazardous waste manifests, universal waste manifests, wastewater shipping records, a record of the waste determination conducted on wastewater, the contingency plan and quick reference guide, arrangements with the local authorities, weekly container inspections, and RCRA personnel training records. ITW provided electronic copies of these records on September 1, 2020.

Manifests

The manifests for the shipment of hazardous waste from August 30, 2017 to August 17, 2020 were reviewed.

ITW's hazardous waste manifests were not available in the EPA's E-Manifest Record System for review.

Universal Waste Manifests

The universal waste manifests for the shipment of lamps, batteries, and e-waste from June 22, 2016 to November 14, 2019 were reviewed.

Wastewater Invoices

The invoices/non-hazardous waste manifests for the shipment of non-hazardous wastewater from August 15, 2019 to March 23, 2020 were reviewed.

Waste Determination

The waste profiles for the non-hazardous wastewater generated from the flushing and cleaning of lines and vats during the manufacturing of water-based cleaning products, dated December 18, 2017 and October 9, 2018 were reviewed.

Contingency Plan

The contingency plan (Plan) and quick reference guide were reviewed. The Plan and the quick reference guide were updated in August 2020.

Arrangements with Local Authorities

The arrangements with the local authorities were reviewed.

Weekly Container Inspection Records

The weekly container inspection records from January 3, 2017 to August 13, 2020 were reviewed. The weekly container inspection for May 10, 2018, and the weekly container inspections for March through July 2020 were not documented. Ms. Davis explained documenting the weekly container inspections for March through July 2020, was not conducted due to a staffing change in their hazardous waste management program.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1), [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Personnel Training

The inspector reviewed the training certificates for RCRA personnel training given to employees

handling and managing hazardous waste for 2017, 2018, and 2019. The job titles and position descriptions for the compliance manager, plant manager, operation manager, chemists, QC technician, mechanic, maintenance supervisor, maintenance technician, line operator, lead operator, and chemical compounder were reviewed.

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

14) Exit-Briefing

Upon conclusion of the inspection, an exit briefing was conducted in the presence of ITW Pro Brands representatives. The facility was informed of the findings at the time of the inspection and upon completion of the record review.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion/Summary of Violations

Based on the CEI conducted on August 14, 2020, ITW Pro Brands was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

17) Signed

for _____
William Kappler
Physical Scientist
Enforcement and Compliance Assurance Division

Date

18) Concurrence

Alan A. Annicella
Chief, Land Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Date

ITW Pro Brands EPA ID.: GAD042216549
RCRA CEI Photographs
August 14, 2020
Photographs by William Kappler
Camera Model: Samsung WB250F
Property Tag #: S75917



ITW Pro Brands. Quality Assurance Laboratory. Inspectors observed one 2.5-gallon container accumulating waste acetone and xylene inside a fume hood not kept closed. ITW closed the container.
Photograph 1 taken at 10:36 a.m.



ITW Pro Brands. Quality Assurance Laboratory. Inspectors observed one 2.5-gallon container accumulating waste acetone and xylene inside a fume hood not kept closed. ITW closed the container.
Photograph 2 taken at 10:41 a.m.



ITW Pro Brands. Chemical Compounding Room. Inspectors observed one 55-gallon container accumulating waste acetone and xylene not kept closed. ITW closed the container. Photograph 3 taken at 10:58 a.m.



ITW Pro Brands. Chemical Compounding Room. Inspectors observed one 55-gallon container accumulating waste acetone and xylene not kept closed. ITW closed the container. Photograph 4 taken at 11:00 a.m.



ITW Pro Brands. Chemical Compounding Room. Inspectors observed one 1.5-gallon container accumulating waste acetone and xylene residue not kept closed and not labeled with words hazardous waste. ITW closed and labeled the container. Photograph 5 taken at 11:01 a.m.



ITW Pro Brands. Chemical Compounding Room. Inspectors observed one 1.5-gallon container accumulating waste acetone and xylene residue not kept closed and not labeled with words hazardous waste. ITW closed and labeled the container. Photograph 6 taken at 11:02 a.m.



ITW Pro Brands. 90-Day or Less Accumulation Area. Inspectors observed one 55-gallon container accumulating waste acetone and xylene labeled with words hazardous waste and marked with the date 5/14/20. Photograph 7 taken at 11:16 a.m.



ITW Pro Brands. 90-Day or Less Accumulation Area. Inspectors observed 55-gallon containers accumulating hazardous waste in this area. Photograph 8 taken at 11:18 a.m.



ITW Pro Brands. Production Meeting Area. Inspectors observed a 10-gallon container accumulating universal waste batteries. The container of universal waste batteries was marked with the date January 21, 2019. On September 11, 2020, EPA received an email from ITW with an attached invoice 81-02481, showing the container of universal waste batteries was shipped on August 27, 2020. Photograph 9 taken at 11:36 a.m.