RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Trojan Battery Co – Lithonia
5174 Minola Dr
Lithonia, GA 30038

EPA ID#: GAD981266380
NAICS #: 335910 Battery Manufacturer

3) Responsible Officials

Amanda Williams
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4) Inspection Participants

Tom Wideman, Trojan Battery
Joe Richard, Trojan Battery
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Tarin Tischler, EPA
Alexis Wilson, EPA
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5) Date of Inspection

8:45 AM February 4, 2025

6) Applicable Regulations[1]

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia

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.

Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to 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").

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 any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by 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-.18 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Trojan Battery Co – Lithonia's compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

Trojan Battery Company (Trojan) is a deep-cycle solar and motive battery manufacturer. Trojan produces and assembles lead acid batteries. The company was founded in 1925 and has been operating at this location since 1988.

Trojan occupies two buildings with a cumulative facility size of approximately 155,000 square feet. The facility operates 24 hours a day, seven days a week and employs 260 staff.

The process areas of the facility consist of the following: oxide, grid casting, pasting and curing, assembly, and formation. In the oxide area, the facility produces an oxide which is put through

a reactor combined with water and lead. The mixture is spun at a specific temperature and frequency to change the mixture from solid, to liquid, then into a lead powder. The next step is the grid casting area, in which lead ingots are melted down into liquid to pour into molds and produce positive and negative lead grids. The pasting and curing area utilize the lead powder produced in the oxide area. The powder is mixed in a solution to produce a paste. This paste is pressed into the lead grids and cured to produce positive and negative plates. The plates are then brought to the assembly area.

The assembly area consists of multiple steps to assemble the lead acid batteries. First, the lead plates are separated by positive or negative charge and divided by rubber plates. The plates are then run through a Cast on Strap (COS) machine in which the lead plates are aligned and cleaned before pouring lead connectors on the battery groups. The battery groups are then sent to the formation area where they are placed on rack, filled with acid, and charged for 36 hours. After charging, the batteries are sent for finishing by washing residual acid from the battery exterior before capping and sending for shipment.

The primary waste stream generated at Trojan is lead and lead contaminated material. All waste lead generated at the facility is sent to a smelter for reclamation. The majority of hazardous waste generated at the facility is lead contaminated PPE carrying EPA waste code D008. The facility also generates paint (D001, D005, D006, D007, F003, F005) and parts washer solvent waste (D039). The facility generates universal waste lamps and batteries. Trojan generates used oil in the maintenance shop. Rinsewater from facility cleaning is sent to the onsite wastewater treatment plant, which is permitted by Dekalb County.

The facility most recently notified as a Large Quantity Generator of hazardous waste via EPA form 8700-12 on February 27, 2024. Trojan is a small quantity handler of universal waste.

9) Previous Inspection History

Georgia Environmental Protection Division (GAEPD) has conducted two RCRA CEIs at the subject facility between 2015 and 2019 and found three violations during those inspections.

On October 28, 2019, GAEPD conducted the most recent RCRA CEI at the subject facility and found three apparent violations of RCRA's requirements for incorrect CAA, SAA, and used oil container labels. These violations were resolved without enforcement action.

10) Opening Conference

On February 4, 2025, EPA inspectors Tarin Tischler, Alexis Wilson, and Devon Robinson, accompanied by GAEPD inspector Ian Hutcheson, arrived at Trojan at approximately 8:45AM. Amanda Williams, EHS Supervisor, immediately received the inspectors. Amanda Williams and the inspectors were joined by Tom Wideman, EHS manager for Trojan Sandersville, Joe Richard, Director of Industrial Hygiene and Safety, Fred Ganster, VP of Environmental Health, Safety, and Sustainability, Obie Sconyers, EHS VP, and Ralph Kafka, Maintenance Manager, for the opening conference. The inspectors introduced themselves, showed their credentials to the facility representatives and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not a business confidentiality claim.

Amanda Williams provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations. The personal protective equipment required in the production areas was hair nets, lab coats, safety glasses, earplugs, steel toed boots, and dust masks. Gloves were also required for those handling material in the production area.

11) Inspection Observations

Wash Area

The facility walkthrough began in the wash area outside of the grid casting area. The wash area is used by facility personnel to change into and out of personal protective equipment (PPE) before entering and exiting the process area. The area consisted of sinks to wash hands, storage for unused PPE, and containers for PPE and respirator filter disposal.

Trojan manages SAAs for PPE contaminated with lead in the wash area and throughout the facility process areas. Inspectors observed one small trash container just outside the door of the wash area (Photo 1). This container was closed and labeled with the words "Hazardous Waste Solid, Lead and Lead compounds."

Inspectors observed three approximately 20-gallon trash containers used as SAA containers in the washroom. These containers were labeled with the words "Hazardous Waste, Leaded Debris, Leaded PPE" (Photo 2). The containers were marked as toxic and had NFPA diamonds with the words "Hazardous waste D008."

Inspectors informed facility representatives that satellite accumulation areas have a cumulative volume limit of 55-gallons per satellite area. Inspectors requested limiting the container size in this area to 55-gallons.

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").

The wash area SAA containers were equipped with a domed lid with an opening on the side for depositing PPE waste (Photo 3). Facility representatives informed inspectors that this container was not closed because the wash area is used constantly throughout the day and personnel are actively adding waste to the container throughout the days. The containers are emptied at the end of each shift. Inspectors observed multiple personnel coming in and out of the washroom and adding waste to the container when in the wash area.

CAA

Trojan manages a central accumulation area for hazardous waste outside of the process area buildings. Trojan employees are equipped with an internal communications radio system capable of providing immediate emergency instruction to facility personnel; The warehouse dock in which the CAA roll off is placed is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; The area is also equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

At the time of the inspection, the CAA consisted of a red 20-yard rollover container with a tarp securely fastened over the top placed against a dock (Photo 4). Facility representatives informed inspectors that the SAA containers for lead contaminated PPE throughout the facility are emptied here at the end of each shift. Inspectors observed a cardboard box on one end of the roll off container sticking out from underneath the tarp cover (Photo 5). Inspectors requested that facility representatives place the box fully inside the container so it could be properly closed and secured.

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.

At the time of the CEI, the roll off container was labeled with the words, "Hazardous waste, Leaded PPE, Leaded Debris" (Photo 6). The label was marked as solid and toxic but missing an accumulation date. On March 6, 2025, Amanda Williams submitted photos of the label with an accumulation date added.

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.

Inspectors observed a powdery white substance on the ground just outside of the roll off container (Photo 7). Inspectors requested that facility representatives clean up the spill and move all waste to a proper hazardous waste container. Inspectors went back to verify this spill had been addressed following the facility walk through.

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.

Universal Waste Cage

The facility manages universal waste lamps and batteries in a fenced cage in the corner of a warehouse used for product and equipment storage (Photo 8). At the time of the inspection, inspectors observed two plastic cylinders for accumulating alkaline universal waste batteries and seven cardboard boxes varying from 4ft to 8ft in length accumulating universal waste lamps.

The two plastic cylinder containers accumulating universal waste batteries were labeled with the words “Universal Waste, lightbulbs” and marked with an accumulation date of 1/23/25 (Photo 9). Facility representatives corrected this label on site to read “Universal Waste Batteries.”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

Of the seven boxes of universal waste lamps, only one was closed and labeled with the words “Universal waste, light bulbs” and marked with an accumulation date of 1/23/25 (Photo 10). The other six boxes were unlabeled and left open (Photos 11 - 14). The universal waste battery and lamp container labeling was corrected during the CEI and inspectors returned after the facility walk through to verify that a label was added and all containers were closed.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

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 to 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.

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.13(d)(1)], a SQHUW of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

The facility manages a satellite accumulation container for aerosol waste in the universal waste cage. The SAA consisted of a 15-gallon drum with an aerosol puncture device attached. Facility representatives informed inspectors that empty aerosol cans are sent for recycling as scrap metal after the contents are drained. This container was unlabeled at the time of the CEI (Photo 15). This was corrected during the CEI, and inspectors returned after the facility walk through to verify that a label was added to the container.

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.

Inspectors also observed a flammable cabinet storing full product aerosol cans, empty gasoline containers, and a partially full, unlabeled paint can (Photo 16). Facility representatives informed inspectors that the paint can was leftover waste paint. Inspectors informed the facility that this container should be labeled as hazardous waste, marked with an indication of hazards and an accumulation date.

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.

The universal waste and hazardous waste containers and labels were corrected on site and inspectors observed photos of the corrections during the CEI. Amanda Williams also sent photos of these containers properly labeled and closed following the inspection on March 6, 2025.

<u>Acid Farm</u>

The facility manages an acid farm on site for the corrosive materials used for lead acid battery production. The facility manages one 4,000-gallon, one 1500-gallon, and one 500-gallon tank of product sulfuric acid in the acid mixing area of the acid farm.

At the time of the CEI, inspectors observed one 55-gallon drum marked with a used oil and universal waste lamps label in the acid farm. Facility representatives informed inspectors that the universal waste label was put on by mistake and the container contains used oil. The universal waste label was removed on site. The drum had a funnel attached to the bung hole at the top which was open (Photo 17). This was closed on site.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(2), Used oil containers and tanks not stored indoors or within impervious secondary containment systems specified by a Spill Prevention, Control, and Countermeasures Plan developed in accordance with 40 CFR Part 112, must be kept closed, except when it is necessary to add or remove used oil.

Inspectors observed three 55-gallon drums of lead scrap metal. This material is sent for recycling and is not managed as hazardous waste. The drums accumulating scrap lead were labeled with the words: LEAD, Danger: prolonged and over exposure to lead may result in damage to the blood-forming, nervous, urinary, and reproductive systems. Inspectors observed lead particles along the side of one of the scrap drums from spilling over when personnel added waste to the container (Photo 18). Inspectors recommended better housekeeping practices when adding waste. Lead powder was also observed on the ground in this area, similar to the spill observed in the CAA.

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.

Inspectors observed six 55-gallon drums labeled as acid sludge and two 55-gallon drums labeled as wastewater treatment sludge (Photos 19 and 20). Facility representatives informed inspectors that the acid pit sludge is generated from the acid pit sump and does not actually contain acid. The wastewater treatment sludge is generated from cleaning the filter press in the wastewater treatment system. Both sludges are sent to a smelter and are not managed as hazardous waste. Inspectors observed an open 55-gallon drum marked as nonhazardous debris with a contains lead sticker. Following the inspection, facility representatives submitted photos of this container stating that it was replaced on February 4, 2025, with a 55-gallon trash container with a lid and is marked as a SAA toxic hazardous waste lead contaminated PPE.

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. § 262.15(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.

<u>Oxide Area</u>

The oxide area is used to form the powdered lead used in production. During the walkthrough of the oxide area, inspectors observed one 50-gallon SAA trash container accumulating lead

contaminated PPE by the entrance, and two of these same containers by the control room in the oxide area. The two containers by the control room exceeded the 55-gallon capacity for satellite accumulation areas.

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").

The SAA PPE containers were closed and labeled as hazardous waste exhibiting the characteristic of toxicity for lead (Photo 22). Inspectors observed spill kits, fire extinguishers, sprinklers, emergency showers and eye wash stations here and throughout the production areas of the facility.

The oxide area houses four baghouses as part of the facility's the ventilation system. Inspectors observed four 55-gallon drums, one connected to each baghouse collecting dust (Photo 21). Facility representatives informed inspectors that this dust is sent to a smelter and is not managed as hazardous waste. Inspectors requested a copy of the waste profile for baghouse dust in the records review.

Grid Casting

The grid casting area consisted of a load lead line of multiple small furnaces for melting lead ingots. The liquid material is then poured into casts and the edges are trimmed to form the positive and negative grids.

Inspectors observed four PPE SAA containers spaced throughout this area which were closed and labeled as hazardous waste exhibiting the characteristic of toxicity for lead. One drum of non-RCRA hazardous remelt was also observed in this area. Oil dry spill kits, fire extinguishers, and an emergency shower and eyewash station were observed in this area. Inspectors also observed two 55-gallon drums accumulating scrap metal in the grid casting area. One container was left open. This was closed on site.

Inspectors observed an open 5-gallon bucket containing liquid under a machine churning cork solution (Photo 23). Facility representatives informed inspectors that this not waste and the residue would be added back to the machine.

Pasting and Curing

The pasting and curing area produces a lead paste from the powder created in the oxide area. This paste is then pressed into the grids and cured to form positive and negative charges. This area had a paste tank and collection system for the paste prior to curing. The floor in this area is

kept slightly wet as dust suppression and so the area is coated by a ride-on floor scrubber every hour. The dirty rinsewater from floor scrubbing is sent to the onsite wastewater treatment plant.

Inspectors observed two open trash SAA containers properly labeled as hazardous waste for contaminated PPE in this area. This was closed on site. One 55-gallon drum labeled as paste sludge was observed in this area. The paste sludge is sent to a smelter and is not managed as hazardous 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.

Assembly

The parts are assembled into lead acid batteries in the assembly area. This area consists of two assembly lines for 6v and 8v batteries. These lines assemble break plates and add the positive and negative elements. The assembled parts are covered with a heat-resistant seal which is then filled with acid and sent to the formation area to charge.

Inspectors observed two closed SAA container properly labeled as hazardous waste for contaminated PPE in this area. An emergency shower, eye wash station, and fire extinguisher in this area.

Formation Area

After assembly, the batteries are sent to the formation area. In this step in the process the batteries are placed on racks and charged for 36 hours before being sent to the finishing area. Inspectors observed one closed SAA container properly labeled as hazardous waste for contaminated PPE in this area.

Finishing Area

The batteries are brought to the finishing room for shipment after charging. Inspectors observed a hand wash bucket in this area where personnel rinse hands when working with batteries. Facility representatives informed inspectors that this water is dumped in the sump in the finishing area when the water becomes waste. The sump automatically pumps to the onsite wastewater treatment area. Inspectors observed two closed approximately 20-gallon SAA container properly labeled as hazardous waste for contaminated PPE in this area.

Wastewater Treatment Plant

Rinsewater from floor cleanings and water drained from sumps are sent to the facility's onsite wastewater treatment plant which operates under a Dekalb county permit. A sodium hydroxide solution generated in the acid farm is added to the wastewater to raise the pH. Iron is added as

a coagulant to the mix which helps remove solids. The iron also drops the pH, so more sodium hydroxide is added to raise it. The facility manages two treatment tanks and two holding tanks with a capacity of 8,000 gallons each. Sludge and wastewater residuals generated during wastewater treatment are sent to a lead smelter and not managed as RCRA hazardous waste.

Maintenance area

The facility operates a parts washer in the maintenance area (Photo 24). The solvent in the parts washed is continuously reused in the system and is not waste until it is picked up for disposal by Safety Kleen. Inspectors reviewed the safety data sheet for the parts washer solvent, which demonstrated the solvent has a flash point of 148 degrees Fahrenheit and is nonhazardous. After being used in the parts washer the solvent is shipped for disposal as D039 RCRA hazardous waste.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG)

The actions that facility personnel should take in response to an emergency are described in the facility's Emergency Contingency Plan, which was last updated on August 3, 2023.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

The plan does not describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the 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. § 262.261(c)] and is a condition of the LQG Permit Exemption, the plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to § 262.256.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. At the time of the CEI, Melvin Thompson was listed as the primary emergency coordinator, and the other individuals were listed in the order in which they will assume responsibility as alternates. The emergency coordinator listed no longer works for the company. The plan was updated on site and Amanda Williams is listed as the primary emergency coordinator.

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. § 262.261(d)] and is a condition of the LQG Permit Exemption, the plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see § 262.264), and this list must be kept up to date.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, PPE, communications and alarm systems, and decontamination equipment. The list appears up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes (s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The facility was not able to demonstrate that a copy of the Emergency Contingency Plan (and its quick reference guide) was submitted to local authorities including police, fire department, and emergency response teams.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or 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.

Please note that [Ga. Comp. R. and Regs. 391-3-11-.08(1] [40 C.F.R. § 262.262(b)] requires an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in [Ga. Comp. R. and Regs. 391-3-11-.08(1] [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in [State Regulation] [40 C.F.R. § 262.262(b)].

On February 14, 2025, the facility submitted an updated contingency plan and corresponding quick reference guide which includes the missing information to EPA via email.

Training Records

The inspectors reviewed facility job descriptions and employee names that were provided for the EHS supervisor and Environmental operators. At the time of the CEI, each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

At the time of the CEI, the job descriptions did not include a description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. On February 14, 2025, Amanda Williams submitted a description of the type and amount of both introductory and continuing training EPA via email updated job descriptions which included a description of the type and amount of both introductory and continuing training.

Inspectors reviewed the hazardous waste training given to all employees, as well as the separate training given to the facility's hazardous waste team. Following the CEI, the facility

provided the rosters for DOT training, dangerous goods training, chemical storage, labeling, and handling training and hazardous waste disposal training completed in 2024.

Waste Manifest and Land Disposal Restriction (LDR) Records

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2021. Hazardous waste manifest records show that D008 hazardous waste lead contaminated PPE, D001, F003, and F005 hazardous waste paint related material are routinely shipped to STAT Incorporated (NCD980799142), and the most recent shipment was made on January 27, 2025. D039 hazardous waste parts washer solvent is sent to Safety-Kleen Systems, Inc. (GAD981265424).

Land disposal restrictions were observed to be attached to the manifests.

Weekly Inspection Records

The inspectors reviewed Trojan's available records of inspections of the hazardous waste central accumulation area (CAA) in 2024. The facility includes all SAAs as well as waste stored in the universal waste cage in the weekly inspections. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about container labels and condition. the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log. No inspection records were provided for the week(s) of February 4, February 11, February 25, April 21, May 12, June 9, August 11, August 25, and October 27.

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.

Universal Waste Shipment Records

Inspectors reviewed Trojan's universal waste shipment documentation for the last year. Trojan shipped universal waste lamps on a uniform hazardous waste manifest three times in 2024. Facility representatives informed inspectors that Trojan just recently began alkaline batteries this year and had not yet had a shipment for disposal.

Waste determination records

Inspectors reviewed waste profiles for paint drained from aerosols, premium parts washer solvent, lead scrap, and baghouse dust. Waste profiles demonstrated that the scrap metal, baghouse dust, and lead dross exhibit the hazardous characteristic of toxicity for lead, however this material is sent to a smelter and is excluded from management under RCRA container management standards of 40 C.F.R. 262.

Shipment Documentation to Smelter

Inspectors reviewed documentation of lead material sent to a smelter. The shipments are documented on a Bill of Lading and demonstrate that recyclable lead and scrap material including dross, dry oxide, paste and plates is regularly sent to Sanders Smelter in Troy, AL and Gopher Resources in Tampa, FL.

Biennial Report

Inspectors reviewed the facility's most recent 2023 Biennial report, which was submitted to EPA on February 27, 2024.

13) Closing Conference

The inspectors conducted the exit meeting at 4:00 p.m. with Amanda Williams, Tom Wideman, Obie Sconyers, and Ralph Kafka. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Trojan agreed to provide training records and the updated contingency plan by February 18, 2025. On February 14, 2025, Amanda Williams provided records in an email to Tarin Tischler. On March 6, 2025, the facility submitted a summary of corrective actions for observations during the inspection which included phots and descriptions of actions taken.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

TARIN TISCHLER Digitally signed by TARIN TISCHLER
Date: 2025.03.17 15:53:09 -04'00'

Tarin Tischler
Life Scientist

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2025.03.17 15:56:11 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

24 Photos taken on: 2/4/2025
Photos taken by: Tarin Tischler
Photos taken with: iPad
EPA Property Tag: SS8852

	Photo 1 – Lead contaminated PPE satellite container outside of wash room.
	Photo 2 – PPE SAA label in wash room.

	Photo 3 – SAA container lid in the wash area.
	Photo 4 – CAA roll off container for lead contaminated PPE.

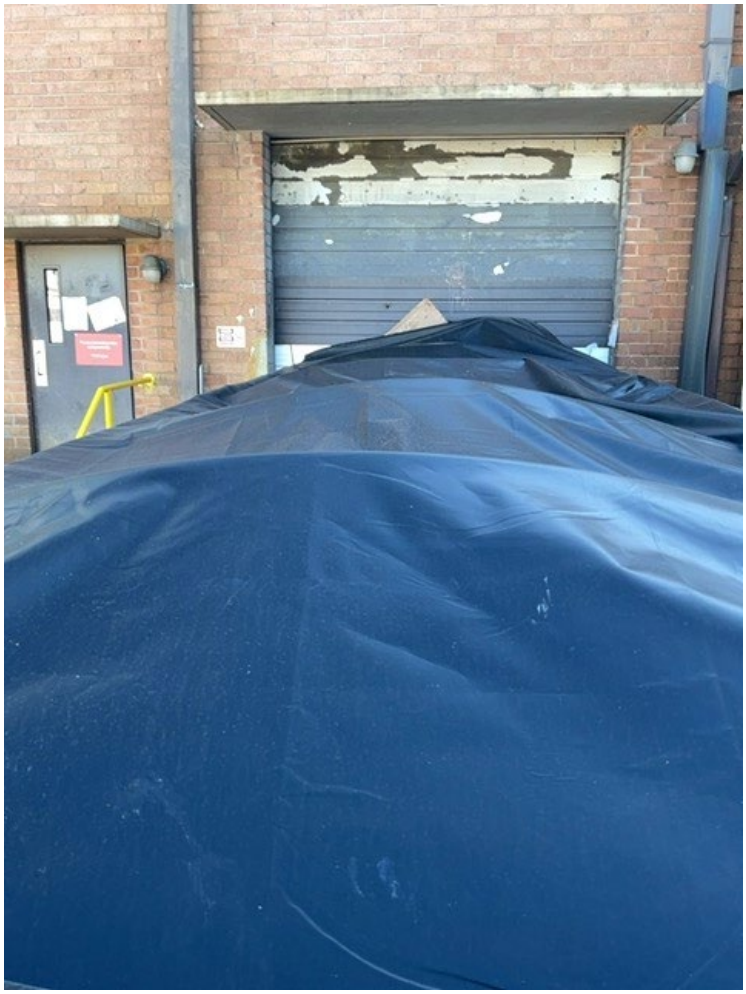	Photo 5 – Box observed to be sticking out of CAA roll off.

	Photo 6 – Labeling on CAA container.
	Photo 7 – White powder spills observed outside of CAA roll off container.

	Photo 8 – Universal waste cage.
	Photo 9 – Label on the universal waste battery containers incorrectly marked as universal waste lightbulbs observed during the CEI.

	Photo 10 – Universal waste label observed on only one of the seven universal waste lamps container.

	Photo 11 – Open boxes of universal waste lamps observed during the CEI.

	Photo 12 - Open box of universal waste lamps observed during the CEI.
	Photo 13 - Open box of universal waste lamps observed during the CEI.

	Photo 14 - Open box of universal waste lamps observed during the CEI.
	Photo 15 – Aerosol can puncture device attached to 15-gallon SAA container.

	Photo 16 – Flammable cabinet with aerosol products and an unlabeled can of paint waste.

	Photo 17 – Open used oil drum observed in the acid farm.

	Photo 18 – Lead observed on the outside of a scrap container in the acid farm.
	Photo 19 – Acid pit sludge drum in the Acid Farm.

	Photo 20 – Wastewater treatment sludge in the Acid Farm.
	Photo 21 – Drum accumulating nonRCRA hazardous baghouse dust in the Oxide Area.

	Photo 22 – Hazardous Waste SAA PPE container in Oxide Area.
	Photo 23 – container accumulating cork residue to be reused in system in the Grid Casting Area.

	Photo 24 – Safety-Kleen parts washer in maintenance area.