

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Dill Air Control Products, LLC
1500 Williamsboro Street
Oxford, North Carolina 27565
County: Granville

Latitude: 36.315228
Longitude: -78.569617
EPA ID Number: NC0991302686
Primary NAICS – 336390 – Other Motor Vehicle Parts Manufacturing
SIC Code – 3714 – Motor Vehicle Parts and Accessories

3) **Responsible Official**

Chris Bass, Machining & Maintenance Manager, Dill Air Control Products, LLC
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4) **Inspection Participants**

Parvez Mallick, U. S. EPA Region 4
Aram Kim, Environmental Senior Specialist, NCDEQ
Heather Goldman, P.S.M, Eastern Region Compliance Supervisor, NCDEQ
Chris Bass, Machining & Maintenance Manager, Dill Air Control Products, LLC
Venessa Alvarado, Human Resources Manager, Dill Air Control Products, LLC
Thomas Hite, Maintenance Supervisor, Dill Air Control Products, LLC

5) **Date of Inspection**

March 23, 2021, 8:30 a.m.

6) **Applicable Regulations**

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939f), 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and NCHWMR, Title 15A of the North Carolina Administrative Code (NCAC), Chapter 13NCAC 13A .0101 to .0119.

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.

Pursuant to 15A NCAC 13A .0107 [40 C.F.R. § 262.17], a generator may accumulate hazardous waste onsite for 90 days or less without a permit or without having interim status, as required by Sections 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 15A NCAC 13A .0107 [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) **Purpose of Compliance Evaluation Inspection**

On March 23, 2021, Aram Kim and Heather Goldman of North Carolina Department of Environmental Quality (NCDEQ), and Parvez Mallick of EPA Region 4, conducted an announced compliance evaluation inspection (CEI) at Dill Air Control Products, LLC (Dill or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an announced EPA lead joint inspection. Dill was represented by Chris Bass, Machining & Maintenance Manager; Venessa Alvarado, Human Resources Manager; and Thomas Hite, Maintenance Supervisor. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

8) **Facility Description**

Dill Air Control Products, LLC is a manufacturer of valves of transportation industry, pressure relief valves for compressor industries and couplings for various markets. Dill is located in Oxford, North Carolina, on a 21.4-acre site. The facility consists of an office and manufacturing area covering 60,000 sq. ft. Dill began operations at this location in September 2005, operating hours are two shifts 24/7. Currently, the facility employs approximately 145 employees. City of Oxford provides potable water and sanitary sewer services.

The facility's most recent hazardous waste generator notification form (EPA form 8700-12) submitted on February 7, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste, generating waste filters (D008) and water from washer and mop water (D008) waste. Primarily, the waste is generated from metal machining processes and brass washing with a potassium hydroxide solution. The brass bath tanks are typically cleaned out four times per

year, generating approximately 2,000 gallons of (D008) lead contaminated wash water each time. In addition, mop water from cleaning the factory floors is managed as D008 waste. Other wastes generated at the facility are used oil, parts washer fluids, and universal waste.

9) **Inspection Findings**

The inspectors performed a walk-through inspection of the facility with Mr. Chris Bass and Thomas Hite. Below is a description of the observations made during the walk-through. During the inspection, all hazardous satellite accumulation area containers were observed to be at or near the point of generation and under control of the operator.

Spinners

The inspectors observed the following containers in the Brass spinner area:

- One closed 55-gallon container of D008 filter waste. The container was marked with the words “Hazardous Waste” and marked with an indication of the hazards of the contents.
- One closed 55-gallon container marked “Used Steel Oil.”

Aluminum spinner area had two closed 275-gallon containers marked “Used Steel Oil.”

Machining Area

The inspectors observed a 275-gallon container holding mop water contaminated with lead (D008) in the machining area. The container was closed, marked with the words “Hazardous Waste” and an indication of the hazards of the contents, and dated with an accumulation start date of 3/22/21.

Product Washing Area

The inspectors observed a 55-gallon containers of lead (D008) contaminated filters. The container was closed, marked with the words “Hazardous Waste”, and marked with an indication of the hazards of the contents.

The inspectors observed yellow dried debris under the washing filtration system on the containment pans (Photo # 1). The facility representative indicated that wash water leaks on the pans once the filter pump seal fails. According to Dill, the spent wash water is a D008 waste. The facility has not made a waste determination of the dried yellow debris/materials stored on the pans. The inspector instructed the facility to clean-up the containment pans and dispose of the yellow materials accordingly.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 15A NCAC 13A .0106 [40 C.F.R. § 261.2], must use the steps articulated in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(a) – (e)] to 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.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator’s knowledge of the waste and support the generator’s determination, as described at paragraphs (c) and (d) of this section.

Main Central Accumulation Area (CAA)

The inspectors observed the following containers in the 90-day hazardous waste storage area:

- Four 275-gallon containers of lead (D008) contaminated mop water and lead contaminated wastewater from the clean-out of the brass wash tanks. The containers were closed, marked with the words “Hazardous Waste” and an indication of the hazards of the contents, and dated 3/2/21, 2/15/21, 2/17/21, and 2/9/21;
- Three 55-gallon containers of lead (D008) contaminated solid waste. The containers were closed, marked with the words “Hazardous Waste” and with an indication of the hazards of the contents, and dated 2/1/21, 3/11/21, and 12/30/20.

The inspectors observed that emergency communication was available in the storage area including cell phones and two-way radios. Emergency equipment was observed included a fire extinguishers and spill kits.

Maintenance Shop

In the Machine Shop, the inspectors observed a 55-gallon container contained spent intact aerosol cans. The container was closed, marked with the words “Hazardous Waste” and with an indication of the hazards of the contents. The inspectors stated that as of February 7, 2020, aerosol cans were added to the 40 C.F.R. Part 273 Universal Waste Regulation in North Carolina. Intact aerosol cans can be managed as universal waste. Universal waste aerosol cans (*i.e.*, each aerosol can), or a container in which the aerosol cans are contained, must be labeled or marked clearly with any of the following phrases: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s)”.

Pursuant to 15A NCAC 13A .0119(b)] [40 C.F.R. § 273.14(f)], a small quantity handler of universal waste (SQHUW) must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste—Aerosol Can(s),” “Waste Aerosol Can(s),” or “Used Aerosol Can(s)”.

Pursuant to 15A NCAC 13A .0119(b)] [40 C.F.R. § 273.15(c)], A SQHUW who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

The 55-gallon container was affixed with an “Universal Waste – Aerosol Cans” label and was dated with a start accumulation date during the inspection.

The inspectors observed three 5-ft long boxes of universal waste lamps dated 3/17/21, 11/3/20, and 3/18/21. The boxes were closed and marked “Universal Waste Lamps”; however, a 2-ft long closed box marked “Universal Waste Lamps” had no start accumulation date (Photo # 2).

Pursuant to 15A NCAC 13A .0119(b)] [40 C.F.R. § 273.15(c)], A SQHUW who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Records Review

The inspection team reviewed the facility records including the manifests and bills of lading, biennial report, training records, waste analysis plan, contingency plan, and inspection records, among other records.

Hazardous wastes generated in 2019 biennial report included:

- Waste filters, EPA waste code D008, 2,884 lbs.; and
- Mop water and water from the washer, EPA waste code D008, 66.2 short tons.

Dill has been using Univar Solutions USA, The Woodlands, TX (TXR000084869), Dupree Logistics, LLC, Duson, LA (LAR000045963), and Freehold Carthage, Freehold, NJ (NJD054126164) as their transporters of hazardous waste and Tradebe Treatment & Recycling of TN, LLC, Millington, Tennessee (TND000772186) and Clean Harbors Environmental Services Inc., Cleveland, OH (OHD000724153) as the designated treatment, storage, and disposal facilities.

According to facility documentation, the contingency plan (CP) was submitted to Granville Fire and Granville Medical Center in August 2020 and to Granville Emergency Management in September 2019. The CP listed the names and emergency telephone numbers of persons identified as emergency coordinators. Since August 2020, emergency coordinators have changed but names and emergency telephone numbers had not been updated, and the revised plan was not sent to the local emergency response entities. The generator must keep documentation that it has made arrangements with local emergency response entities. In addition, Dill could not provide a quick reference guide (QRG) to the inspectors during the inspection. The facility was instructed to develop a QRG during the June 12, 2019, NCDEQ inspection. A LQG must also submit a quick reference guide (QRG) at the time they next submit a revised contingency plan to local response entities due to other necessary revisions. The QRG includes eight elements that are critical to local response entities when an emergency is occurring at the facility:

1. The types and names of the hazardous wastes on site and their hazard in layman's terms (e.g., toxic paint wastes, spent ignitable solvents);
2. An estimated maximum amount of each hazardous waste on site at any one time;
3. The identification of any hazardous waste that would require unique or special treatment by medical staff in the event of exposure;
4. A map of the facility identifying where hazardous waste may be located;
5. A street map of the facility in relation to surrounding businesses, residences, and schools;
6. The location of the water supply;
7. Information about any on-site notification systems to communicate with people at the facility; and
8. The name of an emergency coordinator available at any time.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended whenever the list of emergency coordinators changes.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(i) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a LQG must submit a QRG of the CP at the time they submit a revised contingency plan to local response entities due to other necessary revisions.

Employee hazardous waste training records were reviewed for 2018, 2019 and 2020 and 2021. Dill's hazardous waste training records included the job titles and descriptions for persons responsible for managing hazardous waste, or the names of employees filling those positions. The 2021 RCRA and DOT trainings were provided to twenty-seven employees on March 18, 2021 and March 22, 2021. According to the facility representative, no RCRA and DOT trainings were provided during the calendar year 2020. No records were provided to show that the contingency plan was reviewed by employees involved in management of hazardous waste. In addition, the facility could not provide 2019 RCRA and DOT training records for Mr. Kevin Long and Mr. Gregory Hunsuckle. Please provide emergency coordinator training records for Mr. Thomas Hite, Maintenance Supervisor, a new employee.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(7)(i)-(iii)], which is a condition of the LQG Permit Exemption, facility personnel must successfully complete a program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. Facility personnel must successfully complete this training within six months and must take part in an annual review of the initial training.

10) Out-Briefing

The inspectors conducted the exit meeting with Mr. Chris Bass. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Based on the observations made during the inspection, Dill appeared to be deficient with the RCRA requirements.

11) Signed

Signature
Parvez Mallick
Inspector and Author of Report

Date

12) Concurrence and Approval

Signature
Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Compliance Evaluation Inspection photos taken by Parvez Mallick
Canon PowerShot SD980 IS - EPA Property Number S75319

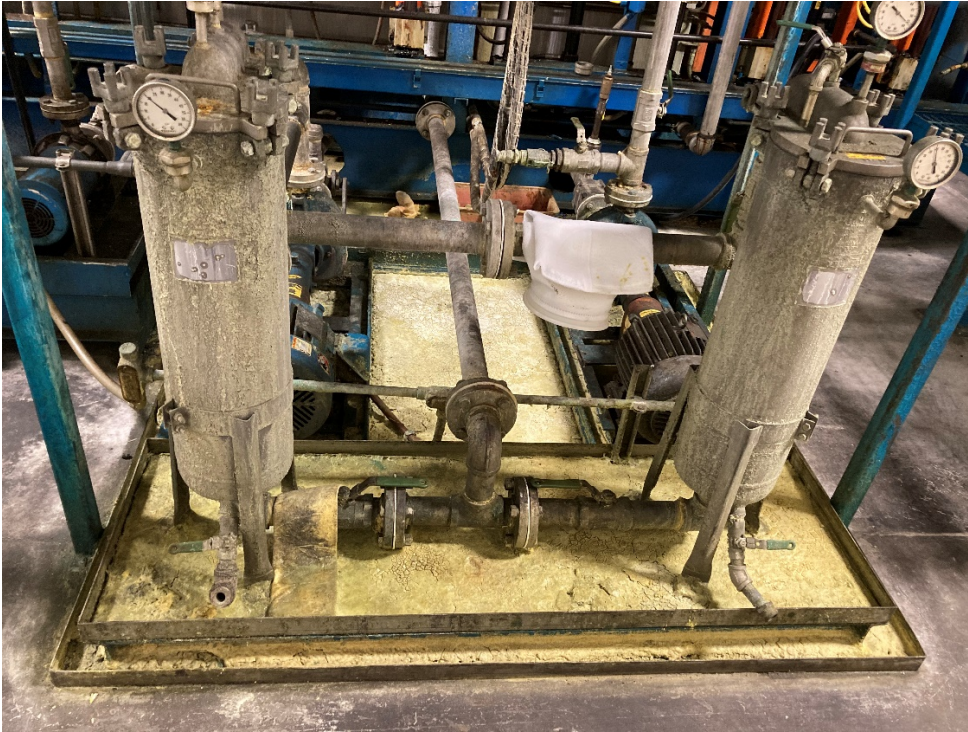


Photo #1 – Yellow dried debris under the washing filtration system.

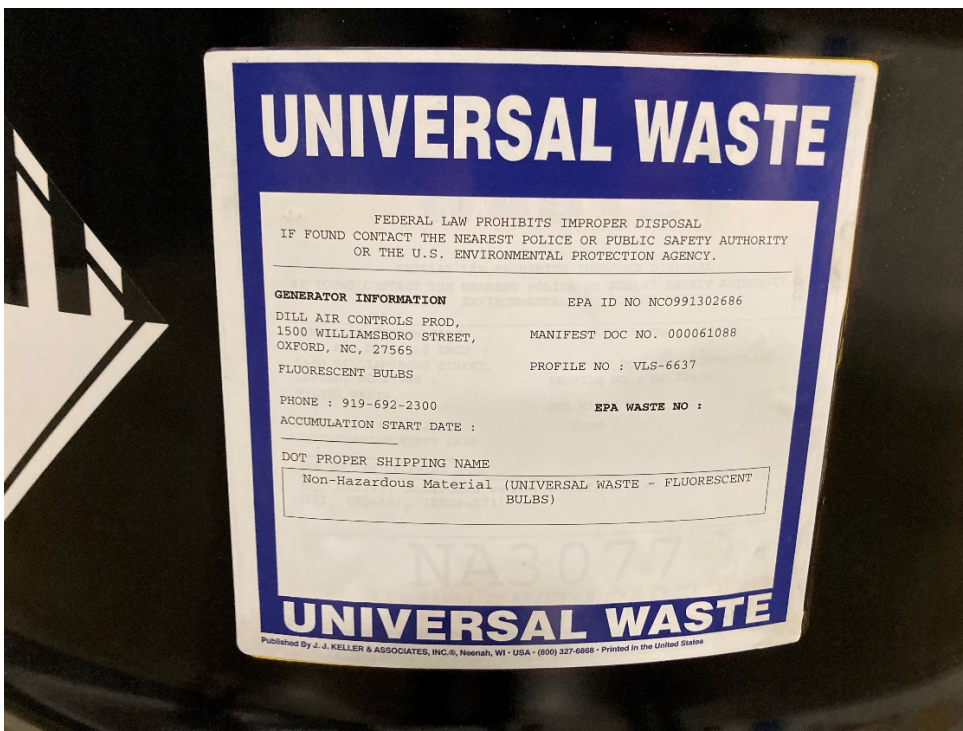


Photo #2 – Universal waste fluorescent bulbs with no start accumulation date.