RCRA Inspection Report

1) Inspector and Author of Report

Laurie Benton DiGaetano
Environmental Engineer
RCRA Enforcement Section
Phone: 404-562-8948
benton-digaetano.laurie@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Marsh Furniture Company (MFC)
1001 South Centennial Street
Hight Point, North Carolina 27261

EPA ID# NCD003233111

3) Responsible Officials

Bruce Braswell, P.G.
Regulatory Compliance Manager
bbraswell@marshfurniture.com

4) Inspection Participants

Bruce Braswell, MFC
Daniel Girdner, NCDEQ

Laurie Benton DiGaetano, USEPA

5) Date of Inspection

March 20, 2023

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; and the North Carolina Solid Waste Management Law, N.C.G.S. §§ 130A-17 to -28 and 130A-290 to - 310.22, and North Carolina Hazardous Waste Management Rules, 15A NCAC 13A .0101 to .0119.

Pursuant to 15A NCAC 13A .0102(b) [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.

[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.

Pursuant to 15A NCAC 13A .0119(b) [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.

Pursuant to 15A NCAC 13A .0107(a) [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 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], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to 15A NCAC 13A .0107(a) [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 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(a) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Marsh Furniture's compliance with the applicable requirements of RCRA and the corresponding North Carolina regulations. This was an EPA lead inspection.

8) Facility Description

Marsh Furniture Company: The Marsh Furniture Company (MFC) is a family-owned business that manufactures kitchen and bathroom cabinetry. The company has owned and operated the subject facility, which performs cabinetry construction, manufacturing, and assembly under the NAICS Code 337110 for Wood Kitchen Cabinet and Countertop Manufacturing, in High Point, North Carolina since 1906. MFC also owns and operates a facility which specializes in making wood used to build front frames for cabinetry products, in Pamlico, South Carolina. The subject facility in North Carolina occupies an estimated 800,000 square feet that is controlled with security fencing and locked gates. Entrance into the complex is controlled by access gates that are opened using an employee badge/card reader system. The company has approximately 800 employees and manufacturing operations run five days per week using one shift.

The Manufacturing Process: The cabinetry manufacturing process at the subject facility includes steps to apply wood finishes to cabinetry parts prior to final assembly. In 2016, the facility's manual flat lines were replaced with contained robotic spray booth systems known as Barberan units. In November 2022, the facility's hanging lines were also replaced with Barberan units.

Currently, the facility operates seven contained Barberan spray booth units and four off-line (hand) spray booths for applying wood finishes to cabinetry parts. The wood finishes include stains, sealers, paints, and topcoats.

In the Downstairs Finishing Area, three horseshoe-shaped lines are used to apply a stain finish to the cabinetry parts. Parts travel through the first horseshoe line, where the first coat of stain is applied using a Barberan unit. Next, the parts are placed onto the second horseshoe-shaped line, where a second coat of stain is applied using another Barberan unit. Before the cabinetry parts are removed from the second horseshoe-shaped line, personnel use Kimtex disposable towels to wipe away any excess stain that remains after the application of the second coat of stain. Finally, the parts are placed onto the third horseshoe-shaped line, where one Barberan unit is used to apply a coat of sealer, and another is used to apply a topcoat.

In the Upstairs Finishing Area, MFC uses three Barberan units to apply a paint finish to cabinetry parts. The first Barberan unit is used to apply the first coat of paint; the second unit is used to apply the second coat of paint; and the third unit is used to apply a topcoat.

In addition to the automated application of finishes using the Barberan units, MFC personnel can also manually apply finishes to cabinetry parts using four off-line spray booths. Finishes are manually sprayed onto cabinetry parts using two hanging spray booths in the Downstairs Finishing Area, one spray booth in the Custom Modification Area, and one spray booth in the Upstairs Roller Room.

Waste Generation: Barberan units generate waste paint related material from flushing and cleaning stain, sealer, paint, and topcoat lines and spray guns before the next finishing product application cycle can begin. This cleaning cycle can occur between color changes or at the end of the day. Personnel explained that the product material is first purged from the spray application system by flushing the lines with air. Next, the system is cleaned with a solvent and air mixture that flows through the spray application lines, through the entire spray gun mechanism and directly into a 55-gallon drum, where the spent solvents are accumulated as D001, F003, F005 hazardous waste paint related material. According to facility personnel, the final step in the solvent and air flush may include a split-second release of solvent through the gun nozzle to clean the tip of the spray gun, but the volume of solvent used for this purpose is extremely small. Personnel stated that solvent would not be released through the gun nozzle in sufficient quantities or velocity to reach the filters in the Barberan unit. As a result, MFC has identified used Barberan spray booth filters as a D001 hazardous waste flammable solid but has not identified them with EPA Waste Codes F003 or F005.

The Barberan units also generate waste paint related material from cleaning the conveyor belt used to transfer cabinetry parts through the Barberan spray booth enclosure to remove stain, sealer, paint, or topcoat overspray from the belt. Personnel explained that overspray product is removed from the surface of the conveyor belt by passing the belt through a shallow tray of cleaning solvent before passing it under a blade used to scrape the overspray product and cleaning solvent from the surface of the belt. The resulting mixture of overspray product and cleaning solvent is pumped from the Barberan unit into a 55-gallon drum where it is accumulated as D001, F003, F005 hazardous waste paint related material.

Inside each Barberan unit, a set of metal braces is used to support the conveyor belt as it transfers cabinetry parts through the spray booth enclosure. These metal braces become coated with a layer of stain, sealer, paint, or topcoat product while they are in use inside the enclosure. At the end of the day, the dirty metal braces are removed from the Barberan unit and placed into a large parts-washing sink that contains cleaning solvents. Each Barberan unit has two sets of these metal braces so that a set of clean, dry braces can be immediately placed into the unit when the set of dirty braces is removed from the unit at the end of the workday. The dirty braces soak in the parts-washing sink overnight, and each morning personnel remove the braces from the sink and stage them for drying throughout the workday. Cleaning solvents are periodically removed from each large parts-washing sink, and the spent solvents are managed as D001, F003, F005 hazardous waste paint related material.

As described in the Manufacturing Process description above, MFC personnel use Kimtex disposable towels to wipe away any excess stain that remains after the second coat of stain is applied in the second-floor finishing area. The used wipes are managed as D001 hazardous waste flammable solids. Because these wipes are not used for the application or removal of cleaning solvents, MFC has not identified them with the EPA Waste Codes F003 or F005.

Each of the four manual spray booths generates waste paint related material and used spray booth filters. MFC manages waste paint related material generated from cleaning spray guns with solvents as D001, F003, F005 hazardous waste and manages used spray booth filters as D001 hazardous waste flammable solids.

MFC also uses aerosol cans for onsite touch-up painting and maintenance activities. Empty cans are collected in designated bins located at workstations throughout the manufacturing area. According to facility personnel, aerosol cans in these bins are transferred to the aerosol can management area in the Old Pump Room at the end of each workday.

Waste Management: The MFC has operated as a large quantity generator (LQG) of hazardous waste at the subject facility for well over thirty years. According to the 2021 biennial report, which was submitted on February 3, 2022, MFC shipped 223.2 short tons of D001, F003, F005 hazardous waste paint related material offsite for fuel blending and 5.37 short tons of D001 hazardous waste flammable solids offsite for storage, bulking, and/or transfer offsite in 2021.

Although MFC was managing numerous satellite accumulation areas (SAAs) and one central accumulation area (CAA) for accumulating and storing hazardous waste at the time of the inspection, facility personnel stated that they were in the process of defining and establishing SAAs for wastes generated in the new Barberan spray booths. The facility uses empty 55-gallon drums, which were originally used to deliver raw materials to the facility, to accumulate and store hazardous waste on-site. D001 hazardous waste flammable solids are shipped off-site in these 55-gallon drums, but D001, F003, F005 hazardous waste paint related material is not. Instead, the D001, F003, F005 hazardous waste paint related material is pumped from the 55-gallon drums into a tanker truck for transport off-site. Once empty, these former waste drums are sent offsite for reconditioning and reuse by the raw material vendor.

9) Previous Inspection History

This is the first EPA RCRA CEI at the subject facility, and the NCDEQ conducted the most recent RCRA CEI on February 25, 2019. Over the past twenty years, the NCDEQ has conducted a total of eight RCRA CEIs and found two container management violations during one of those inspections in 2017.

10) Opening Conference

On March 20, 2023, EPA inspector Laurie Benton DiGaetano, accompanied by North Carolina inspector Daniel Girdner, arrived at Marsh Furniture at approximately 9:50 AM. Bruce Braswell, Regulatory Compliance Manager, immediately received the inspectors. The EPA inspector showed credentials to Bruce Braswell, and the inspectors explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection. 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 assert a business confidentiality claim. 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, and the EPA inspector referenced the EPA's information sheet for small businesses, which can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf.

Bruce Braswell 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 Bruce Braswell led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Upstairs Roller Room SAA:

The inspection participants observed six back-to-back manual paint booths in the Upstairs Hanging Line #1 area. These booths are referred to as the Old Flat Line Finishing operations, which were previously used to coat the front and back of cabinetry frames. The line was not in operation during the inspection, and Bruce Braswell explained that it had been taken out of service and replaced by Barberan units in November 2022.

At the time of the inspection, MFC was still operating one offline manual spray booth (SB-13) in the Upstairs Roller Room. The facility manages one SAA in this area for accumulating line flush and spent solvents used to clean the spray gun and equipment in this manual spray booth. The inspectors observed one 55-gallon drum in this SAA (Photo 1). The drum was located on a secondary containment pallet next to the booth and it was equipped with an agitator. Bruce Braswell explained that MFC adds a neutralizer to a new drum before it is used to accumulate spent solvents. The agitator disperses this neutralizer, which prevents the waste from hardening so that it can be pumped from the drum into a tanker truck for transport off-site. The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. The drum was

also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum. Because the hazard indication information was found on the original product labels for drums that were also labeled as hazardous waste throughout the facility, the inspectors recommended implementing a system to ensure that the relevant hazards are clearly communicated as being applicable to the waste inside each drum and not just to the product material initially inside the drum.

Upstairs Barberan Paint Line SAAs:

The inspectors observed three Barberan units and three large parts-washing sinks in the Upstairs Barberan Paint Line Area. MFC manages one SAA at each Barberan unit for accumulating waste paint related material from flushing and cleaning paint and topcoat lines and spray guns and from cleaning overspray off the conveyor belt used to transfer cabinetry parts through the Barberan spray booth enclosure. The inspectors observed one 55-gallon drum, which was on a secondary containment pallet and equipped with an agitator, in each of these three SAAs: Barberan #5 (Photo 2), Barberan #6 (Photo 3) and Barberan #7 (Photo 4). Each drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. Each drum was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with that drum.

As described in the Waste Generation portion of the Facility Description above, MFC cleans metal braces used to support the conveyor belt inside each Barberan unit by removing the braces from the unit and submerging them in a large solvent parts-washing sink associated with that unit. Bruce Braswell explained that the parts-washing sinks are emptied of spent solvents and refilled with fresh solvent about once per week. Spent solvents generated in the sinks are managed as D001, F003, F005 hazardous waste paint related material when they are removed, but MFC does not typically manage an active SAA at each sink. Instead, the spent solvents are transferred from the sink into a 55-gallon drum which is taken directly to the CAA for management onsite.

According to Bruce Braswell, the facility does not typically manage SAAs at the parts-washing sinks. However, MFC was managing one active SAA at the Barberan #6 parts-washing sink at the time of the inspection. The inspectors observed one 55-gallon drum in this SAA (Photo 5). The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste (Photo 6). It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with that drum (Photo 7).

In addition to the waste paint related materials generated from cleaning Barberan units and equipment, MFC also generates used filters in each Barberan unit. As described in the Waste Generation portion of the Facility Description above, MFC personnel have determined that these used filters do not come into contact with spent solvents, and they are managed as D001 hazardous waste flammable solids. Bruce Braswell explained that used filters are removed from the Baberan units daily, but the facility does not typically manage an active SAA for accumulating the waste. Instead, the used filters are placed into a 55-gallon drum which is taken directly to the CAA for management onsite. The inspectors did not observe any active SAAs for accumulating used filters at the time of the inspection.

Upstairs New Hanging Lines SAAs:

MFC manages one SAA at each of two New Hanging Lines (NHL) in the Upstairs Paint Area. Each SAA is used to manage line flush and spent solvents used to clean the spray gun and equipment in the associated manual spray booth. The inspectors observed one 55-gallon drum in each SAA next to its associated spray booth: NHL 1 Stage 3.1 (Photo 8) and NHL 1 Stage 3.2 (Photo 9). Each drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. Each drum was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with that drum.

Custom Modification Shop SAA:

MFC manages one SAA at the manual spray booth in the Custom Modification Shop. The SAA is used to manage line flush and spent solvents used to clean the spray gun and equipment in the associated manual spray booth. The inspectors observed one 55-gallon drum in this SAA (Photo 10). This drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.

Downstairs Barberan Stain Lines SAAs:

In the Downstairs Barberan Stain Line area, the inspectors observed one Barberan unit and large parts-washing sink for each of four application processes: Stain Line 1, Stain Line 2, Sealer Line, and Topcoat Line. Each Barberan unit generates waste paint related material from flushing and cleaning lines and spray guns and from cleaning overspray off the conveyor belt used to transfer cabinetry parts through the Barberan spray booth enclosure. Although MFC was managing one SAA at each Barberan unit in the Upstairs Barberan Paint Line area, personnel explained that they were still in the process of establishing SAAs in the Downstairs Barberan Stain Line area. It appears that MFC could designate a single SAA for each Barberan unit to accumulate hazardous waste paint related material generated by that unit.

The inspectors observed one 55-gallon drum in a SAA for accumulating waste paint related material generated by the process used to apply the first coat of stain:

- One 55-gallon drum (Photo 11) used to accumulate waste paint related material generated from flushing stain lines and spray guns with cleaning solvents and from cleaning overspray off the conveyor belt used to transfer cabinetry part through the Barberan unit. The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.

The inspectors observed two 55-gallon drums in a SAA for accumulating waste paint related material generated by the process used to apply the second coat of stain:

- One 55-gallon drum (Photo 12) used to accumulate waste paint related material generated from cleaning overspray off the conveyor belt used to transfer cabinetry parts through the Barberan unit. This drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.

- One 55-gallon drum (Photo 13) used to accumulate waste paint related material generated from flushing stain lines and spray guns with cleaning solvents in the Barberan unit. The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.

It appears that the total volume of D001, F003, F005 hazardous waste paint related material exceeded 55-gallons in the SAA for accumulating waste paint related material generated by the process used to apply the second coat of stain.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days. During the three-consecutive-calendar-day period the generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

The inspectors observed two containers in a SAA for accumulating wipes that were used to remove excess stain from cabinetry parts following the application of the second coat of stain:

- One 20-gallon flip-top flammable can (Photo 22) used to accumulate wipes that were used to remove excess stain from cabinetry parts following the application of the second coat of stain. The 20-gallon container was labeled "solvent excluded wipes," but it was not labeled with the words "hazardous waste" or with an indication of the hazards of its contents.
- One 55-gallon drum (Photo 23) used to accumulate wipes that were used to remove excess stain from cabinetry parts following the application of the second coat of stain. The 55-gallon drum was labeled D001 hazardous waste flammable solids, and it was also identified with a flammable solids DOT hazard placard. However, the bolt used to close the 55-gallon drum by tightening the ring that secures the lid to the container was not fastened.

Personnel explained that wipes are transferred from the 20-gallon container into the 55-gallon container, which is later moved to the CAA and eventually sent offsite as D001 hazardous waste flammable solids. The total volume of D001 hazardous waste flammable wipes may have exceeded 55-gallons in this SAA.

Pursuant to 15A NCAC 13A .0107(a) [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" and with an indication of the hazards of the contents.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of the container is necessary.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of

excess waste, comply with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days. During the three-consecutive-calendar-day period the generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

The inspectors observed two 55-gallon drums in an SAA for accumulating waste paint related material generated in the Barberan unit that applies the sealer:

- One 55-gallon drum (Photo 14) used to accumulate waste paint related material generated from cleaning overspray off the conveyor belt used to transfer parts through in the Barberan unit. Although the drum was labeled as hazardous waste, the specific information on the label did not accurately identify the contents of the container (Photo 15). The drum was labeled as flammable solid paint filters and D001 hazardous waste. It was also identified with a flammable solid DOT hazard placard and other GIS hazards on the original product label associated with the drum. Personnel immediately replaced the hazardous waste label with one that identified the contents as waste paint related material and D001, F003, F005 hazardous waste. Personnel also replaced the flammable solid DOT hazard placard with a flammable liquid DOT hazard placard.
- One 55-gallon drum equipped with a funnel (Photo 16) used to accumulate waste paint related material generated from flushing and cleaning sealer lines and spray guns in the Barbaran unit, from emptying the large parts-washing sink located next to this Barberan unit, and from disposing of excess sealer product at the end of each day. The inspectors observed one 20-gallon container of product sealer, which is pumped into the Barberan unit for application onto the cabinetry parts. Personnel explained that a catalyst must be added to the product sealer before it can be used, and any liquid that remains in the product container at the end of the day is accumulated as hazardous waste. The 55-gallon drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. Although the drum was identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum, markings on the product label obscured the hazard information so that it was not clearly applicable to the contents of the container (Photo 17).

It appears that the total volume of D001, F003, F005 hazardous waste paint related material exceeded 55-gallons in this SAA for accumulating waste paint related material generated by the process used to apply the sealer.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days. During the three-consecutive-calendar-day period the generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

The inspectors observed two 55-gallon drums in an SAA for accumulating waste paint related material generated in the Barberan unit that applies the topcoat:

- One 55-gallon drum (Photo 18) used to accumulate waste paint related material generated from cleaning overspray off the conveyor belt used to transfer cabinetry parts through the Barberan unit. The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.
- One 55-gallon drum equipped with a funnel (Photo 19) used to accumulate waste paint related material generated from flushing topcoat lines and spray guns with cleaning solvents in the Barberan unit. The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.

It appears that the total volume of D001, F003, F005 hazardous waste paint related material exceeded 55-gallons in this SAA for accumulating waste paint related material generated by the process used to apply the topcoat.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days. During the three-consecutive-calendar-day period the generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

Although facility personnel indicated that MFC does not typically manage SAAs at the parts-washing sinks the inspectors observed one 55-gallon drum in an SAA for accumulating waste paint related material generated in a large parts-washing sink used next to the Barberan unit that applies the topcoat:

- One 55-gallon drum equipped with a funnel (Photo 20). The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. Although the drum was identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum, the label had been scratched off in some places so that the hazard information was not clearly applicable to the contents of the container (Photo 21).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Although facility personnel indicated that MFC does not typically manage SAAs for accumulating used filters, the inspectors observed one 55-gallon drum in an SAA for accumulating used filters generated by the Barberan unit(s) in the Downstairs Stain Lines:

- One 55-gallon drum used to accumulate used filters generated in the Barberan unit(s) (Photo 23). The drum was labeled as D001 hazardous waste flammable solids and identified with a flammable solid DOT hazard placard. However, the bolt used to close the 55-gallon drum by tightening the ring that secures the lid to the container was not fastened.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of the container is necessary.

Stain Pump Room SAA:

MFC manages one SAA in the Pump Room for managing spent solvents that are generated during cleaning activities in this area. The inspectors observed one 55-gallon drum in this SAA (Photo 24). The drum was equipped with a latched funnel; it was labeled as waste paint related material and D001, F003, F005 hazardous waste; and it was identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.

Old Trim Out Area SAA:

MFC manages one SAA at the manual spray booth in the Old Trim Out Area. The SAA is used to manage line flush and spent solvents used to clean the spray gun and equipment in the associated manual spray booth. The inspectors observed one 55-gallon drum in this SAA (Photo 25). Although the drum was labeled as hazardous waste, the specific information on the label did not accurately identify the contents of the container. The drum was labeled as flammable solid paint filters and D001 hazardous waste. The drum was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum. Personnel immediately replaced the hazardous waste label with one that identified the contents as waste paint related material and D001, F003, F005 hazardous waste.

Paint Pump Room SAA:

MFC manages one SAA in the Paint Pump Room for managing spent solvents that are generated during cleaning activities in this area. The inspectors observed one 55-gallon drum in this SAA (Photo 26). The drum was labeled as waste paint related material and D001, F003, F005 hazardous waste. It was also identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with the drum.

Workstation Aerosol Cans and Old Pump Room SAA:

MFC personnel use aerosol products to perform touch-up painting and repair operations at workstations throughout the subject facility. The inspectors observed an individual collection bin at a workstation in the Upstairs Barberan Paint Line Area (Photo 27) and in other areas throughout the subject facility. Each bin was labeled as "empty spray cans only." Bruce Braswell explained that employees place used aerosol cans into these bins, and the cans are transferred from the bins to a 100-gallon Rubbermaid tub at the Old Pump Room SAA every day.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(f)], a small quantity handler of universal waste (SQHUW) must identify the type of universal waste by labeling or marking universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol cans are contained clearly with any of the following phrases: "Universal Waste – Aerosol Can(s), or "Waste Aerosol Can(s)," or "Used Aerosol Can(s)."

The inspectors observed the 100-gallon tub next to a 55-gallon drum and a trash can in the Old Pump Room SAA. The 100-gallon tub was labeled as "inbound charged aerosol cans" (Photo 28); the 55-gallon drum was equipped with an aerosol can puncturing device (Photo 29); and the trash can was labeled "outbound cans for recycling." According to Bruce Braswell, the operator from the Paint Pump Room punctures used aerosol cans in this area every day. The contents of the aerosol can are accumulated in the attached 55-gallon drum, which was labeled as waste paint related material and D001, F003, F005 hazardous waste, and was identified with a flammable liquid DOT hazard placard and other GIS hazards on the original product label associated with that drum. After they have been punctured and emptied, the aerosol cans are accumulated in the trash can and ultimately sent off-site for metals recycling.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.14(f)], a small quantity handler of universal waste (SQHUW) must identify the type of universal waste by labeling or marking universal waste aerosol cans (i.e., each aerosol can), or a container in which the aerosol cans are contained clearly with any of the following phrases: "Universal Waste – Aerosol Can(s), or "Waste Aerosol Can(s)," or "Used Aerosol Can(s)."

Central Accumulation Area (CAA):

MFC manages a hazardous waste CAA in a covered concrete pad that is surrounded by walls made of a 6-foot chain link fence topped with metal sheeting that reaches the level of the roof. The area was identified with a sign which read "no smoking" and "no open flames" outside of the gated entrance. Upon entering the structure, the inspectors observed markings painted on the concrete floor to identify five yellow rows for storing containers of hazardous waste (Photo 30). The rows were separated by aisle spacing which was clearly defined with red paint.

Employees working in the CAA carry a two-way radio to provide internal communications and immediate emergency instruction to facility personnel; and the fire suppression system automatically notifies the local fire department if the sprinkler system is activated. The inspectors observed portable fire extinguishers, fire control equipment, and spill control equipment in the CAA. The CAA was not equipped with an emergency shower or eyewash station, but facility personnel stated that this equipment is located inside the building.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(a) [40 C.F.R. § 262.252] and is a condition of the LQG Permit Exemption, all areas deemed applicable must be equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; portable fire extinguishers, fire control equipment, spill control equipment, and decontamination

equipment; and water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

The inspectors observed twenty-six 55-gallon drums of hazardous waste on the first yellow row on the floor of the CAA. The containers were arranged so that fourteen 55-gallon drums were lined up on the floor in a row that was two drums wide and seven drums long, and twelve 55-gallon drums were stored directly on top of the first fourteen drums in a row that was two drums wide and six drums long.

- All twenty-six drums were identified with a flammable liquid DOT hazard placard.
- Twenty-five of the twenty-six drums were labeled as waste paint related material and D001, F003, F005 hazardous waste.
- Twenty-three of those twenty-five drums were marked with an accumulation start date less than 90 days old (Photo 31), but the other two were not marked with an accumulation start date (Photo 32, 33, and 34).
- The final drum (Photo 35) was not labeled with the words hazardous waste or marked with an accumulation start date.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label containers with the words "Hazardous Waste"; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

The inspectors observed six 55-gallon drums of hazardous waste on the second yellow row of the CAA. The containers were arranged so that four 55-gallon drums were lined up on the floor in a row that was two drums wide and two drums long, and two 55-gallon drums were stored directly on top of the first four drums.

- Each drum was labeled as waste paint related material and D001, F003, F005 hazardous waste.
- Each drum was identified with a flammable liquid DOT hazard placard.
- Each drum was marked with an accumulation start date less than 90 days old.

The inspectors did not observe any containers in the third row of the CAA.

The inspectors observed twelve containers of hazardous waste on the fourth yellow row of the CAA. The containers were arranged so that seven 55-gallon drums were lined up in a single row on the yellow painted line on the floor and five 55-gallon drums were stored directly on top of the first row of drums.

- Each of the twelve 55-gallon drums was labeled as flammable solid / paint filters and as D001 hazardous waste.
- Eleven of the drums were marked with an accumulation start date less than 90 days old, but the twelfth drum was not marked with an accumulation start date (Photo 36).
- Seven of the twelve drums were identified with a flammable solid DOT hazard placard, but five were identified with a flammable liquid (not solid) DOT hazard placard (Photo 37).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label containers with 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 inspectors observed five containers of hazardous waste in the fifth yellow row of the CAA. The containers were arranged so that three 55-gallon drums were lined up in a single row on the floor and two 55-gallon drums were stored directly on top of the first three drums.

- Each of the five 55-gallon drums was labeled as flammable solid / paint filters and as D001 hazardous waste.
- Each drum was marked with an accumulation start date less than 90 days old.
- Two of the five drums were identified with a flammable solid DOT hazard placard, but three were identified with a flammable liquid (not solid) DOT hazard placard.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label containers with an indication of the hazards of the contents.

Universal Waste Management:

MFC manages universal waste lamps in the Maintenance Department. The inspectors observed one 8-foot cardboard box of used fluorescent lamps in this area. The box was closed, labeled universal waste lamps, and marked with an accumulation start date of March 16, 2023.

Contingency Plan:

The actions that facility personnel should take in response to an emergency are described in the facility's contingency plan, which was last updated on December 9, 2021. A copy of the contingency plan (and its quick reference guide) was most recently submitted to the High Point Police Department (HPPD), the High Point Fire Department (HPFD), the Guilford County Local Emergency Planning Committee (LEPC), Atrium Health – Wake Forest Baptist Hospital, and Zebra Environmental Industrial Services on February 8, 2022.

The contingency 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; it includes the name and emergency telephone number for the emergency coordinator; it describes arrangements agreed to with the HPFD, the Guilford County LEPC, the HPPD, the High Point Regional Health Center, and Zebra Environmental; it includes a list of emergency equipment at the facility and a facility diagram that indicates the location of fire extinguishers, fire alarm pull-stations, spill kits, and emergency eyewash stations; and it describes evacuation procedures for personnel, and states that evacuation maps are displayed in plant areas.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the hazard(s) associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a street map of the facility in relation to surrounding businesses,

schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

The existing facility diagram identified nine SAAs and one CAA onsite, but the inspectors observed twenty-two potential SAAs during the CEI:

9 SAAs Identified in Quick Reference Guide	22 Observed Potential SAAs
Stain Finish Line	
Stain Finish Line	Barberan Stain 1 Overspray and Line Flush
	Barberan Stain 2 Overspray
	Barberan Stain 2 Line Flush
	Barberan Stain Sealer Overspray
	Barberan Stain Sealer Line Flush
	Barberan Stain Topcoat Overspray
	Barberan Stain Topcoat Line Flush
	Barberan Stain Parts Wash Sink
	Stain 2 Wipes
	Barberan Stain Filters
Pump Rooms	
Stain Pump Room	Stain Pump Room
Paint Pump Room	Paint Pump Room
Paint Finishing Line	
Paint Finishing Line	Upstairs Roller Room Offline Spray Booth
Paint Finishing Line – Short Line	Barberan #5 Paint Overspray and Line Flush
Frame Finishing Line	Barberan #6 Paint Overspray and Line Flush
Frame Finishing Line – Offline Booth	Barberan #7 Paint Overspray and Line Flush
Hang Line	Barberan Paint Parts Wash Sink
	Old Trim Out Offline Spray Booth
	New Hang Line Stage 3.1
	New Hang Line Stage 3.2
Custom Shop	
Custom Shop Offline Spray Booth	Custom Shop Offline Spray Booth
Aerosol Cans	
	Aerosol Can Puncture Station

As a result of the transition from the Old Flat Line Finishing Operations in the Upstairs Hanging Line #1 Area to the Barberan spray booth units, personnel were in the process of updating the facility diagram that shows where hazardous wastes are generated, accumulated, and treated and routes for accessing these wastes, but this information was not accurately included in the quick reference guide at the time of the inspection.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(a) [40 C.F.R. § 262.263] and is a condition of the LQG Permit

Exemption, the contingency plan must be reviewed, and immediately amended, if necessary, whenever the generator facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(6)], which incorporates 15A NCAC 13A .0107(a) [40 C.F.R. § 262.262(c)] and is a condition of the LQG Permit Exemption, generators must update, if necessary, their quick reference guides, whenever the contingency plan is amended and submit these documents to the local emergency responders or, as appropriate, the Local Emergency Planning Committee.

Training Records:

MFC has identified two categories of personnel for hazardous waste training. Those employees in the position of New Finishing Supervisor, Cabinet Repair, Compliance Manager, Sprayer, Utility, Lead Person/Department, Finish Material Coordinator, Spray Booth Operator, Sander, Load/Unload, Packer, Pump Room Operator, Custom Shop Finisher, Parts Coordinator, and President should receive full annual hazardous waste training, and those employees in the position of Lead Person/Department, Finish Repair, Inspector, Utility, Glaze Break Away, Builder, Materials Coordinator, and Cabinet Repair should receive limited hazardous waste training. It appears that some of these job titles appear both lists for full and limited hazardous waste training.

Hazardous waste training records included the name, job title, and date of hire for employees filling job descriptions that require hazardous waste training. The inspectors reviewed records documenting formal RCRA training for the Regulatory Compliance Specialist in 2020, 2021, 2022 and 2023, and in-house training for facility personnel.

Waste Manifest Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2020.

Inspection Records:

The inspectors reviewed available records of inspections of the hazardous waste central accumulation area (CAA) since January 25, 2021. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The records include the date and time of the inspection and the signature of the employee conducting the inspection.

12) Closing Conference

The inspectors conducted the exit meeting at with Bill Bumgarner, Vice President of Human Resources, Ken Kuhn, Plant Manager, Edwin Underwood, President Chief Operating Officer, and Bruce Braswell, Regulatory Compliance Manager. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) List of Attachments

Attachment 1 – Photo Log:

37 Photos taken on: March 20, 2023
Photos taken by: Laurie Benton DiGaetano
Photos taken with: Panasonic DMC TS-5 Digital Camera
EPA Property Tag: S09533

14) Signed

LAURIE DIGAETANO

Digitally signed by LAURIE DIGAETANO
Date: 2023.05.11 08:18:54 -04'00'

Laurie Benton DiGaetano
Environmental Engineer

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2023.05.11 11:12:32 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

	**Upstairs Roller Room - Photo 1**: 55-gallon drum on a secondary containment pallet in the Upstairs Roller Room SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Upstairs Barberan Paint Line - Photo 2**: 55-gallon drum on a secondary containment pallet in the Barberan #5 Liquid SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Upstairs Barberan Paint Line - Photo 3**: 55-gallon drum on a secondary containment pallet in the Barberan #6 Liquid SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.

	**Upstairs Barberan Paint Line - Photo 4**: 55-gallon drum on a secondary containment pallet in the Barberan #7 Liquid SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Upstairs Barberan Paint Line - Photo 5**: 55-gallon drum in the Barberan #6 Parts Washer SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Upstairs Barberan Paint Line - Photo 6**: Close-up of label on 55-gallon drum in the Barberan #6 Parts Washer SAA shown in Photo 5. Drum was labeled hazardous waste D001, F003, F005 waste paint related material.

	**Upstairs Barberan Paint Line - Photo 7**: Close-up of label on 55-gallon drum in the Barberan #6 Parts Washer SAA shown in Photo 5. Drum was marked with an indication of the hazards on the product label.
	**Upstairs New Hanging Lines - Photo 8**: 55-gallon drum in the New Hanging Line 1 Stage 3.1 (NHL 1 S – 3.1) SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Upstairs New Hanging Lines - Photo 9**: 55-gallon drum in the New Hanging Line 1 Stage 3.2 (NHL 1 S – 3.2) SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.

	**Custom Modification Shop - Photo 10**: 55-gallon drum in the Custom Modification Shop Spray Booth SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Downstairs Barberan Stain Line - Photo 11**: 55-gallon drum in the First Stage Stain Finishing Line Flush SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Downstairs Barberan Stain Line - Photo 12**: 55-gallon drum in the Second Stage Stain Finishing Line Wipe Rags SAA (on left), the Second Stage Stain Finishing Filters SAA (in the middle), and the Second Stage Finishing Overspray SAA (on right). Drum on the left was labeled hazardous waste D001 flammable paint rags; drum in the middle was labeled hazardous waste D001 solid paint filters; and drum on the right was labeled hazardous waste D001, F003, F005 waste paint related material. Each drum was marked with an indication of the hazards on the product label.

	**Downstairs Barberan Stain Line - Photo 13**: 55-gallon drum in the Second Stage Stain Finishing line flush liquids SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Downstairs Barberan Stain Line - Photo 14**: 55-gallon drum in the Stain Finishing Line Sealer Line Flush SAA. Drum was labeled hazardous waste D001 flammable solid paint filters and marked with an indication of the hazards on the product label. Employees immediately replaced the hazardous waste label with one that read hazardous waste D001, F003, F005 waste paint related material.
	**Downstairs Barberan Stain Line - Photo 15**: Close-up of product label with indication of hazards on 55-gallon drum in the Stain Finishing Line Sealer Line Flush SAA.

	**Downstairs Barberan Stain Line - Photo 16**: 55-gallon drum in the Stain Sealer Line Flush and parts washer vat SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Downstairs Barberan Stain Line - Photo 17**: Close-up of product label on 55-gallon drum in the Stain Sealer Line Flush and parts washer vat SAA.
	**Downstairs Barberan Stain Line - Photo 18**: 55-gallon drum in the Stain Topcoat Overspray Liquid SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.

	**Downstairs Barberan Stain Line - Photo 19**: 55-gallon drum in the Stain Topcoat Line Flush and parts washer vat SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Downstairs Barberan Stain Line - Photo 20**: 55-gallon drum in the First Stage Stain Finishing Line parts washer vat SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Downstairs Barberan Stain Line - Photo 21**: Close-up of product label on 55-gallon drum in the Stain Finishing Line parts washer vat SAA.

	**Downstairs Barberan Stain Line - Photo 22**: 20-gallon flip-top flammable can in the Second Stage Stain Finishing Line Wipe Rags SAA. Drum was labeled excluded solvent contaminated wipes but is emptied into a 55-gallon drum in this SAA. The 55-gallon drum is labeled hazardous waste D001 flammable paint rags.
	**Downstairs Barberan Stain Line - Photo 23**: 55-gallon drum in the Second Stage Stain Finishing Line Wipe Rags SAA (on left) and the Second Stage Stain Finishing Filters SAA (on right). Drum on the left was labeled hazardous waste D001 flammable paint rags and drum on the right was labeled hazardous waste D001 solid paint filters. Each drum was marked with an indication of the hazards on the product label.
	**Pump Room - Photo 24**: 55-gallon drum in the Pump Room SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.

	**Old Trim Out Area - Photo 25**: 55-gallon drum in the Old Trim Out Area Spray Booth SAA. Drum was labeled hazardous waste D001 flammable solid paint filters, and should have been labeled hazardous waste D001, F003, F005 waste paint related material. Drum was marked with an indication of the hazards on the product label.
	**Paint Pump Room - Photo 26**: 55-gallon drum in the Paint Pump Room SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Workstation Aerosol Cans - Photo 27**: Bin at workstation used to accumulate used aerosol cans. Bin is emptied and cans are brought to the aerosol can puncture station at the end of each day.

	**Old Pump Room - Photo 28**: 100-gallon Rubbermaid tub of used aerosol cans next to the Aerosol Can Puncture Station SAA. Aerosol cans are waiting for processing by the puncture device.
	**Old Pump Room - Photo 29**: 55-gallon drum in the Aerosol Can Puncture Station SAA. Drum was labeled hazardous waste D001, F003, F005 waste paint related material and marked with an indication of the hazards on the product label.
	**Central Accumulation Area - Photo 30**: Hazardous Waste Central Accumulation Area.

	**Central Accumulation Area - Photo 31**: Close-up of label on 55-gallon drum in CAA shown on the left in Photo 32. Drum is labeled hazardous waste D001, F003, F005 waste paint related material, and it is marked with an accumulation start date of March 17, 2023.
	**Central Accumulation Area - Photo 32**: 55-gallon drum in CAA. Drum is labeled hazardous waste D001, F003, F005 waste paint related material, and it is marked with an indication of the hazards on the product label. However, the drum is not marked with an accumulation start date.
	**Central Accumulation Area - Photo 33**: Close-up of label on 55-gallon drum in CAA shown on the right in Photo 32. Drum is labeled hazardous waste D001, F003, F005 waste paint related material, but it is not marked with an accumulation start date.

	**Central Accumulation Area - Photo 34**: One drum of hazardous waste D001, F003, F005 waste paint related material in Row 1 of the CAA that was not marked with an accumulation start date.
	**Central Accumulation Area - Photo 35**: 55-gallon drum in CAA that is not labeled hazardous waste or marked with an accumulation start date.
	**Central Accumulation Area - Photo 36**: One drum of hazardous waste D001 in Row 4 of the CAA that was not marked with an accumulation start date.

	**Central Accumulation Area - Photo 37**: Row Four in the CAA. Drums of hazardous waste D001 flammable solids. Five drums were identified with an indication that they contained flammable liquids.