RCRA Inspection Report

1) Inspector and Author of Report

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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

Carolina Pole, Inc.
237 Forestry Road
Eutawville, South Carolina 29408

EPA ID# SCD982113128

3) Responsible Officials

Philip Kizer
Plant Manager
kizerpw@koppers.com

4) Inspection Participants

Philip Kizer	Carolina Pole, Inc.
Rod Pringle	Carolina Pole, Inc.
Gerald Shealy	South Carolina Department of Health and Environmental Control (SCDHEC) Columbia
Alan Risa	SCDHEC Low Country Region
Daryl R. Himes	US EPA Region 4 Atlanta

5) Date of Inspection

November 30, 2022, at 9:15 a.m. EDT

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

[1] As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 262.10], a Large Quantity Generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2200 lbs) of non-acute hazardous waste in a calendar month.
Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste 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 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.262.16(b)(2) or [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine SI Group, Inc.'s compliance with the applicable requirements of RCRA and the corresponding SCDHEC regulations. This was an EPA lead inspection.

8) Facility Description

The facility is located on 56 acres with approximately 35 of those acres being used for the plant's operations. Carolina Pole, Inc. is owned by Koppers, Inc.

Carolina Pole, Inc. operates a copper/chrome/arsenate (CCA) pole treatment plant at this location.

Debarked poles are placed onto a cart on a rail system (Photos 1 and 3) and rolled into a cylindrical metal treatment tank (Photos 1 and 2) measuring 80 feet in length and 6 feet in diameter. The treatment cylinder is within the Treatment Building, a covered structure which houses the facility's boiler and tanks containing water, treatment chemicals and wood conditioners.

Once poles are pulled into the treatment cylinder, the ends of the cylinder are closed, and a vacuum is pulled on the contents of the cylinder. Water pulled from the poles during the vacuum is removed. Copper and chromated arsenic treatment chemicals are added to the cylinder. The contents of the cylinder are pressurized. Once pressure is taken off the cylinder, the treated poles

are rolled from the treatment cylinder on the rail system over a concrete pad which extends outward on both ends of the treatment cylinder (Photo 8). As the cylinder opens on both ends, the rail system extends outward on each end.

Each end of the rail system extending from the treatment tank is equipped with a concrete tank collection system (Photo 1) which captures drippage and debris from treated poles exiting the treatment cylinder. Treatment chemicals falling into the secondary containment system flow back towards the treatment cylinder and are collected in a concrete sump which is part of the collection system for reuse. Wood chips and other debris falling from the treated poles when they are rolled out from the treatment cylinder are also collected within the secondary containment system and a container at the base of the openings of the treatment cylinder (Photo 2)

Carolina Pole, Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated May 9, 2022, described the facility as a Large Quantity Generator (LQG) of hazardous waste. The notification listed the following EPA Hazardous Waste Numbers: D001, D004, D007, and F035.

9) Previous Inspection History

This facility was last inspected on November 5, 2020, by SCDHEC. No violations were observed during the inspection.

10) Opening Conference

On November 30, 2022, EPA inspector Daryl Himes, accompanied by SCDHEC inspectors Gerald Shealy and Alan Risa, arrived at Carolina Pole at approximately 9:15 a.m. Philip Kizer, the facility's Plant Manager, immediately received the inspectors in the lobby of the facility's main office building. The inspectors presented their credentials and were escorted to a conference room for an opening conference and discussion of facility operations. The inspectors were joined in the conference room by Rod Pringle. Introductions were conducted and the inspectors explained the purpose of their visit and stated their desire to see all active generation and accumulation locations of hazardous waste in addition to the facility's hazardous waste records.

The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records. Carolina Pole, Inc exceeds the number of employees to be considered a small business. 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.

11) Inspection Observations

A walk-through inspection of the facility was then performed.

Unless noted otherwise, all containers of hazardous waste observed within SAAs were closed, labeled with the words "Hazardous Waste," and marked with an indication of the hazard(s) associated with the waste contained.

In addition, unless noted otherwise, all containers of hazardous waste observed within central accumulation areas (CAAs) for less than 90 days were closed, marked with an accumulation start date, labeled with the words "Hazardous Waste," and marked with an indication of the hazard(s) associated with the waste contained.

Also, unless noted otherwise, all containers of universal wastes were observed to be closed, labeled with appropriate universal waste language and dated with an accumulation start date of less than one year.

A walk-through inspection of the facility was then conducted, and the following areas were observed:

Drip Pads

The concrete collection systems (drip pads) which exist on the west and east end of the metal treatment cylinder were observed to be in good condition at the time of the inspection. Each pad was free of any cracks or gaps. A minimal amount of debris was present in each drip pad.

Pole Staging Area

Concrete pads exist beneath a metal roof for the staging of poles on both the east and west end of the treatment cylinder (Photos 1, 3 and 8). Each of these pads were well maintained and free of cracks or gaps.

Treatment Building

The treatment building encloses the facility's treatment cylinder and tanks which contain the facility's treatment chemicals, wood conditioners and makeup waters. Tanks observed within this building included three 20,000-gallon tanks with various premixed amounts of treatment chemicals per unit volume and one 20,000-gallon tank of concentrated treatment chemicals. The building also contained one 5,000-gallon freshwater tank, three 4,000-gallon work tanks and one 10,000-gallon tank of climbing enhancer or wood conditioner. All of these tanks were situated on a concrete base which makes up the floor of the treatment building. The concrete base within this building was free of cracks and gaps. No leaks from any of these tanks was evident at the time of the inspection.

Central Accumulation Area

The facility operated a central accumulation area (CAA) for the collection of D004/D007 characteristic and F035 listed hazardous waste from the collection of contaminated debris from within the facility's drip track and staging area (Photo 4, 5 and 6). At the time of the inspection,

twenty-five 55-gallon drums of D004/D007/F035 hazardous waste were observed in this area. The accumulation start date on each of the hazardous waste in drums was less than 90 days.

Aerosol Can Collection Drum

One 55-gallon container of D001 characteristic hazardous waste spent aerosol cans was observed within a SAA on the north side of the Treatment Building (Photo 7).

Record Review

After the walk-through inspection, the inspectors requested and reviewed the facility's applicable training records, contingency plan, inspection records and manifests for the past two years.

Closing Conference

The inspection team conducted an exit meeting at the end of the walk-through inspection and review of the facility's hazardous waste records with facility personnel listed in the participants section above. During this meeting, the inspectors discussed their preliminary findings made during the inspection.

12) Signed

DARYL HIMES Digitally signed by DARYL HIMES Date: 2023.01.11 21:02:14 -05'00'

Daryl R. Himes
Environmental Engineer

Date

13) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ Date: 2023.01.18 09:54:57 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

Carolina Pole, Inc.

Eutawville, South Carolina

COMPLIANCE EVALUATION INSPECTION

SCD982113128

November 30, 2022

Photographs taken by Daryl R. Himes
Photographs taken with Canon Power Shot Elph 360 HS

Photo 1 – Rail system and concrete secondary containment system outside of west end of treatment tank

Photo 2 – West end of treatment cylinder and debris catch basin

Photo 3 – Rail system and concrete catch basin/drip pad on west end of drip pad. Staging area on right side of drip pad in photo.

Photo 4 – Hazardous waste drums in CAA on north end of building housing treatment cylinder

Photo 5 – Label on Drums of Hazardous Waste Drums in CAA

Photo 6 – Hazardous waste drums in CAA

Photo 7 – Drum of D001 characteristic hazardous waste spent aerosol cans

Photo 8 – Eastern Pole Staging Area