

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Honda Manufacturing of Alabama, LLC
1800 Honda Drive
Lincoln, Alabama 35096
Talladega County

EPA ID No.: ALR000016261

3) Responsible Officials

Ms. Leigh Rainwater
Honda Manufacturing of Alabama, LLC
1800 Honda Drive
Lincoln, Alabama 35096
leigh_rainwater@hma.honda.com
(205) 355-5000 x 3308

4) Inspection Participants

Leigh Rainwater, Honda Manufacturing of Alabama, LLC
Matthew Henderson, Honda Manufacturing of Alabama, LLC
Ryan Slovensky, Univar Solutions
Matthew Buchanan, Univar Solutions
Jeff Ragsdale, Univar Solutions
Drew Phillips, Alabama Department of Environmental Management
William Kappler, Environmental Protection Agency, Region 4

5) Date and Time of Inspection

August 18, 2020, at 9:45 a.m.

6) Applicable Regulations

Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code § 22-30-1 *et seq.*, [Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)] and rules 335-14-1 to 335-14-17

(2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code) [40 Code of Federal Regulation (C.F.R.) Parts 260-270, 273 and 279].

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) Purpose of Inspection

On August 17, 2020, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Alabama Department of Environmental Management (ADEM) contacted Honda Manufacturing of Alabama, LLC, to discuss a RCRA compliance evaluation inspection (CEI). Inspectors identified themselves and EPA explained the purpose of the RCRA CEI and the date and time of the RCRA CEI. The EPA explained the health and safety procedures, general areas for inspection, equipment that will be used, and the RCRA records needed for review. Honda Manufacturing of Alabama, LLC, representatives identified themselves and explained the facility operational status, health and safety procedures, and record review information. Honda Manufacturing of Alabama, LLC, is currently operational. A face mask, social distancing, and hand-washing practices are observed at the facility. The facility requires a temperature check.

After the meeting, the EPA sent an email to Honda Manufacturing of Alabama, LLC, to confirm the date and time of the RCRA CEI, with a business card, and a list of the RCRA records needed for review. Honda Manufacturing of Alabama, LLC, confirmed the date and time, provided copies of the 2019 notification of regulated waste activity (8700-12), the emergency response plan, a training certificate, the hazardous waste minimization plan, the facility's waste stream guide, the RCRA job description, and documentation of Honda's shipment of purge solvent for reclamation.

On August 18, 2019, inspectors from the EPA and the ADEM conducted an announced CEI at Honda Manufacturing of Alabama, LLC, (hereinafter, "Honda" or the "facility") to determine its compliance status with the RCRA and the State of Alabama regulations. This was an EPA-lead inspection. Inspectors arrived at Honda and were greeted by facility representatives.

The inspectors were asked to sign a "Visitor's Sign-In and Escort Sign-Out" Form and were each issued a visitor badge. Each inspector's temperature was checked by the facility using a non-contact digital thermometer. The inspectors were escorted by vehicle to Honda's contractor (Univar Solutions) building for an entrance briefing. Inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an entrance briefing.

8) Facility Description

Honda is located at 1800 Honda Drive, Lincoln, Talladega County, Alabama. The facility has been at this location since 2000 and consists of 1,350 acres of property. The property is owned by Honda. The facility employs approximately 4,500 people and operates seven days per week and 16 hours per day on two eight-hour shifts. The facility consists of three building with approximately five million square feet of space. The City of Anniston provides potable water service and the City of Lincoln provides domestic waste service. The primary NAICS codes for

the facility are 336112, 336370, 331221, and 331523.

Honda submitted an annual notification of its regulated waste activity to ADEM on February 20, 2020, notifying as a large quantity generator of hazardous waste (LQG) and a large quantity handler of universal waste (LQHUW).

9) **General Process Description**

Honda is an automotive manufacturing facility, which manufactures the Honda Ridgeline truck, the Honda Pilot sport utility vehicle, and the Acura MDX sport utility vehicle. Manufacturing operations conducted at the site include metal shaping and stamping, welding, painting, plastic injection molding, metal machining, electroplating, aluminum engine casting, engine assembly, vehicle assembly, and PE testing areas.

The facility operates three main production areas located in three main buildings. The manufacturing buildings consists of Manufacturing Line 1 and Manufacturing Line 2. Each Manufacturing Line includes; metal fabrication areas, plastic molding areas, the bumper side paint area, the bumper side paint area wastewater treatment plant, the body side paint area, the body side paint area waste water treatment plant, the primary paint mixing room, the secondary paint mixing room, the manufacturing and assembly areas, the PE testing areas, and the touchup painting area.

The Engine Manufacturing/Assembly Plant includes an aluminum casting operation, an engine assembly area, and a tool and die shop.

A small-scale aluminum casting operation is used to produce aluminum engine blocks for the VTEC V-6 engines in the automobiles manufactured at the facility. The engine production operation generates slag, which is managed as scrap metal.

The machining and assembly area consist of a series of automated metalworking machines that smooth and deburr aluminum engine blocks, cut and shape raw metal into engine components, and assemble various components. The production operation generates used cutting oil.

A tool and die shop are located near the center of the Engine Manufacturing/Assembly Plant. Maintenance and repair work are performed on the facility's tools, dies, equipment, and machinery.

The Engine Manufacturing/Assembly Plant is equipped with an air quality control system that removes oily mist from the air inside the building.

Honda operates a wastewater treatment facility for treatment of process water used in the manufacturing process. Waste solid/sludge is not generated from the WWTF's operation. The facility also consists of a test track, contractor buildings, and Honda's administrative offices.

All hazardous waste and non-hazardous waste generated by Honda is managed by the contractor Univar Solutions (Univar). Univar's offices are located on-site. Nexeo Solutions and Univar merged in September 2019.

10) Previous Inspection History

Honda was last inspected by the ADEM on August 18, 2015. The facility was cited for not keeping two containers of used oil closed and not labeling five containers of used oil with the words used oil.

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

11) Findings

The information in this RCRA inspection report is based on the EPA's August 18, 2020, RCRA CEI.

90-Day or Less Accumulation Area near Manufacturing Line 1

The 90-Day or Less Accumulation Area (90-Day) is located outdoors and accumulates waste generated from Manufacturing Line 1. The 90-Day is a corrugated metal shed next to a tank farm. The tank farm is used for the storage of chemical products for the manufacturing process. The chemical products stored in the tanks include; gasoline, motor oil, transmission fluid, antifreeze, windshield washer fluid, and refrigerant. The 90-Day is constructed with a bermed concrete pad and is enclosed within a locked chain-link fence. Signs were observed with the words "Caution", "Hazardous Waste Storage Area", "Danger", "Unauthorized Persons Keep Out", and "No Smoking" posted on the chain-link fence.

The inspector observed a satellite accumulation area (SAA) for the puncturing and accumulation of waste solvent generated from the aerosol cans. The SAA is identified by a sign. The aerosol cans are accumulated in a container from various areas of the Manufacturing Line 1 building and transferred to this 90-Day and punctured. Inspectors observed one 55-gallon container accumulating waste solvent. The container was closed, in good condition, labeled with the words hazardous waste and labeled with the word flammable to indicate the hazard of the contents. The inspector observed the container was not marked with a date. It appears the waste aerosol cans are initially accumulated in the Manufacturing Line 1 building. Since the container is not at or near the initial point of accumulation, the container should be marked with an accumulation start date. On August 28, 2020, Honda explained their countermeasure in an email to EPA and ADEM that the aerosol can puncturing operation and SAA container in this area was discontinued and containers in this 90-Day will be marked with a date.

¹Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1., [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 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with

¹ "ADEM's newly adopted Generator Improvements Rule (GIR) regulations (effective on April 6, 2018) are currently under review by the EPA and have not yet been authorized. However, for ease of reference and for consistency with the State Inspection Report, this CEI Report will cite to the Alabama and federal hazardous waste regulations as amended by the GIR. New requirements that have become effective pursuant to the GIR, but have not yet been authorized, are noted with an asterisk. These provisions are effective and enforceable as a matter of State law but are not federally enforceable."

the conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)-(8), [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(i)c, [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label the date upon which each period of accumulation begins clearly visible for inspection on each container.

The inspector observed the following hazardous waste accumulating in this 90-Day at the time of the inspection:

One 55-gallon container accumulating a D001 ignitable hazardous waste. The container was closed, in good condition, labeled with the words hazardous waste, labeled with the word flammable to indicate the hazard of the contents, and marked with the date June 6, 2020.

Thirteen 250 to 275-gallon totes, seven 55-gallon containers, and one 30-gallon container accumulating used oil. The containers were closed, in good condition and labeled or marked with the words used oil.

One 30-gallon container accumulating universal waste batteries. The container was closed, labeled with the words universal waste, and dated August 17, 2020.

Inspectors observed spill control and emergency equipment stored in this area. Two-way radios are used for communications.

90-Day or Less Accumulation Area near Manufacturing Line 2

The 90-Day or Less Accumulation Area (90-Day) is located outdoors and accumulates waste generated from Manufacturing Line 2. The 90-Day is a corrugated metal shed next to a tank farm. The tank farm is used for the storage of chemical products for the manufacturing process. The area is constructed with a bermed concrete pad and is enclosed within a locked chain-link fence. Signs were observed with the words “Caution”, “Hazardous Waste Storage Area”, “Danger”, “Unauthorized Persons Keep Out”, and “No Smoking” posted on the chain-link fence.

The inspector observed a SAA for the accumulation of waste gasoline and waste D-Limonene contaminated rags. The SAA is identified by a sign. The waste gasoline is generated from the Line 2 manufacturing process and the waste D-Limonene rags are generated at the end of the assembly area from the Line 2 manufacturing process. The waste streams are then transferred to this 90-Day and accumulated in a SAA. The inspector observed two 55-gallon containers accumulating waste gasoline and waste D-Limonene contaminated rags. The containers were closed, in good condition, labeled with the words hazardous waste and labeled with the word flammable to indicate the hazard of the contents. The inspector observed the containers were not marked with a date (photographs 1, 2, and 3). It appears the hazardous waste is initially accumulated in the Manufacturing Line 2 building. Since the containers are not at or near the initial point of accumulation, the containers should be marked with an accumulation start date. On August 28, 2020, Honda explained their countermeasure in an email to EPA and ADEM to mark a date on the container of waste gasoline and D-Limonene rags as soon as material is introduced into the container in this area. A picture showed the containers marked with the date August 18, 2020.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(i)c, [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label the date upon which each period of accumulation begins clearly visible for inspection on each container.

The inspector observed the following hazardous waste accumulating in this 90-Day at the time of the inspection:

Nineteen 55-gallon containers accumulating hazardous waste paint and solvent and hazardous waste paint related material. The containers were closed, in good condition, labeled with the words hazardous waste, labeled with the word flammable to indicate the hazard of the contents, and marked with dates either in June, July or August 2020. The earliest date observed was June 23, 2020.

Seven 550-gallon and three 289-gallon containers accumulating water borne paint and waste paint (D001, F003, F005). The containers were closed, in good condition, labeled with the words hazardous waste, labeled with the word flammable to indicate the hazard of the contents, and marked with dates either in June, July or August 2020.

One 5-gallon container accumulating universal waste batteries. The container was closed, labeled with the words universal waste, and dated May 21, 2020.

A wooden pallet accumulating several lead/acid batteries. Each battery was labeled with the words universal waste and marked with dates either in June, July or August 2020.

Inspectors observed spill control and emergency equipment stored in this area. Two-way radios are used for communications.

Weld Department for Manufacturing Line 2

This SAA is for the accumulation of aerosol cans generated from the manufacturing operations. The inspector observed one 55-gallon metal container accumulating waste aerosol cans. The top lid of the container was marked with the words “Empty Aerosol Cans & Propane Cylinders for Recycling”. The inspector observed the container was not kept closed. Inspectors observed the container was approximately one-quarter full and at least one aerosol can was observed containing liquid. The container was not labeled with the words hazardous waste and not labeled with an indication of the hazard of the contents (photographs 4, 5, and 6). The inspector asked Ms. Rainwater to provide the waste determination result conducted on this waste stream. On August 28, 2020, Honda explained their countermeasure and attached a picture in an email to EPA and ADEM showing the container was closed, labeled with the words hazardous waste, labeled with the word flammable to indicate the hazard of the contents, and marked with a date.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(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 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 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or (7)(a), [40 C.F.R. § 262.16(b) or §262.17(a)], except as

required in Admin. Code r. 335-14-3-.01(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 ADEM Admin. Code r. 335-14-3-.01(5)(a), [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5.(i-ii), [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 ADEM Admin. Code r. 335-14-3-.01(5)(a)4., [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.

12) Waste Management Practices

Hazardous waste is generated from the cleaning, painting, and assembly of automobiles. The facility generates waste body primer, D-Limonene soaked rags and debris, waste paint rags, waste gasoline rags and debris, maintenance related solvents, VM&P Naptha, waste gasoline, waterborne paint, D-Limonene liquid, waste paint and solvent, (D001, D005, D018, F003, and F005) and sludge removed from the waste water treatment plants associated with the electroplating lines (F019). The F019 sludge is delisted and is shipped to VLS and incinerated for energy recovery.

Other waste streams generated by the facility consist of non-hazardous sludge generated from the waste water treatment plants associated with the paint lines, electronic waste, waste airbag modules, spent lead-acid batteries, spent dry cell batteries, spent fluorescent lamps, used oil, oil-contaminated material, aluminum slag, and scrap metal.

According to Ms. Rainwater, Honda has discontinued shipping solvent used to flush the facility’s paint lines to Giant Resource Recovery – Attalla, Inc. (GRR) for use at GRRs facility to flush equipment and piping. Honda is shipping the purge solvent (D001, F003, F005) to Superior Oil Company, Inc. (Superior Reclamation Energy Division) located at 1402 North Capital Avenue, Indianapolis, Indiana, for reclamation of the solvent.

Univar Solutions is the on-site hazardous waste contactor who manages the hazardous waste accumulation areas located throughout the facility, transports hazardous wastes to the 90-day or less accumulation areas, consolidates hazardous waste, and prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to a treatment, storage or disposal facility (TSDF).

Honda used the following transporters in 2017 through 2020.

Univar Solutions USA Inc – TXR000084869

Nexeo Solutions – OHR000162800

Nexeo Solutions – TXR000084869

Active Resources – ALR000007237

Honda used the following TSDF in 2017 through 2020.

Giant Resource Recovery – ALD070513767

Clean Earth of Alabama – ALD981020894

AES Environmental LLC – KYD985073196

VLS Armor – TND981920119

13) Record Review

During the CEI, EPA requested the facility provide hazardous waste manifests, universal waste manifests, purge solvent shipping records, waste determination records on waste aerosol cans, information on the F019 delisting, the contingency plan and quick reference guide, arrangements with the local authorities, weekly container inspection records, RCRA personnel training records, most recent biennial report, and waste minimization plan. Honda provided electronic copies of these records on August 17, 2020, August 28, 2020, September 4, 2020, and September 15, 2020.

Manifests

The manifests for the shipment of hazardous waste from July 24, 2017 to June 19, 2020 were reviewed.

Four hazardous waste manifests were reviewed using EPA's E-Manifest Record System, for shipments in January 2020 to July 2020.

Universal Waste Manifests

The universal waste manifests for the shipment of lamps, batteries, air bags, and e-waste from January 21, 2019 to June 1, 2020 were reviewed.

Purge Solvent Reclamation Records

The hazardous waste manifests for the purge solvent from January 21, 2019 to June 1, 2020 were reviewed.

Waste Determination

A copy of the updated Honda waste stream guide was reviewed. The waste determination conducted on waste aerosols was reviewed.

F019 Delisted Sludge

ADEM's letter dated December 11, 2007, excluding Honda's F019 wastewater treatment sludge was reviewed.

Contingency Plan

The Emergency Response Plan was amended on January 26, 2018, and the Quick Reference Guide was revised on August 26, 2020. The Emergency Response Plan and Quick Reference Guide were reviewed.

Arrangements with Local Authorities

The arrangements with the local authorities were reviewed. SEI is Honda's internal security department that responds and coordinates emergency operations. Lincoln Fire Rescue is the Fire Department for the City of Lincoln, Alabama. Honda has two on-site medical clinics that operate

under Honda's Plant Safety Department. The clinics are staffed by one doctor, two nurse practitioners and staff nurses.

Weekly Container Inspection Records

The weekly container inspection records from August 4, 2017 to August 14, 2020 were reviewed. It appears the weekly container inspection for October 22, 2017, September 7, 2018, December 9, 2018, March 10, 2019, March 17, 2019, June 9, 2019, October 18, 2019 (Line 1), November 1, 2019, November 29, 2019, December 27, 2019, and March 13, 2020 (Line 1) were not documented. The date on the March 13, 2020 Line 1 inspection record appeared to be crossed out and replaced with a different date.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(v), which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. The large quantity generator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Personnel Training

The RCRA training records for Leigh Rainwater were reviewed.

Univar Solutions is the contractor who handles and manages the hazardous waste operations for Honda. Univar Solutions gives the RCRA training to its employees. The certificates for RCRA training given to Kendrick Baker, Phillip Bothwell, Kevin Merritt, John Farris, Shawn Orr, and Jeffery Ragsdale for 2018, 2019, and 2020 were reviewed. The job titles and position descriptions were reviewed.

Hazardous Waste Biennial Report

Honda submitted the 2019 biennial report to ADEM.

Hazardous Waste Minimization Program Plan

The most recent revision to the hazardous waste minimization plan, dated October 29, 2016, was reviewed.

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

14) Exit-Briefing

Upon conclusion of the inspection, an exit briefing was conducted in the presence of Honda Manufacturing of Alabama, LLC representatives. The facility was informed of the findings at the time of the inspection and during a conference call.

15) Sampling Overview

Sampling was not conducted at this facility.

16) **Conclusion/Summary of Violations**

Based on the CEI conducted on August 18, 2020, Honda Manufacturing of Alabama, LLC was inspected as a large quantity generator of hazardous waste and a large quantity handler of universal waste.

17) **Signed**

William Kappler
Physical Scientist
Enforcement and Compliance Assurance Division

Date

18) **Concurrence**

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

Date

Honda Mfg. of Alabama LLC.
ALR000016261
August 18, 2020
RCRA CEI Photographs
Photographs by William Kappler
Camera Model: Samsung WB250F
Property Tag #: S75917



Honda Mfg. of Alabama LLC. 90-Day or Less Accumulation Area Line 2. The inspector observed a SAA for waste gasoline and waste D-Limonene contaminated rags. The waste gasoline is generated from the Line 2 manufacturing process and the waste rags are generated at the end of the Line 2 assembly area. The wastes are then transferred to this 90-Day and accumulated in a SAA. The containers were not marked with a date. Photographs 1 taken at 12:45 p.m. (EST).



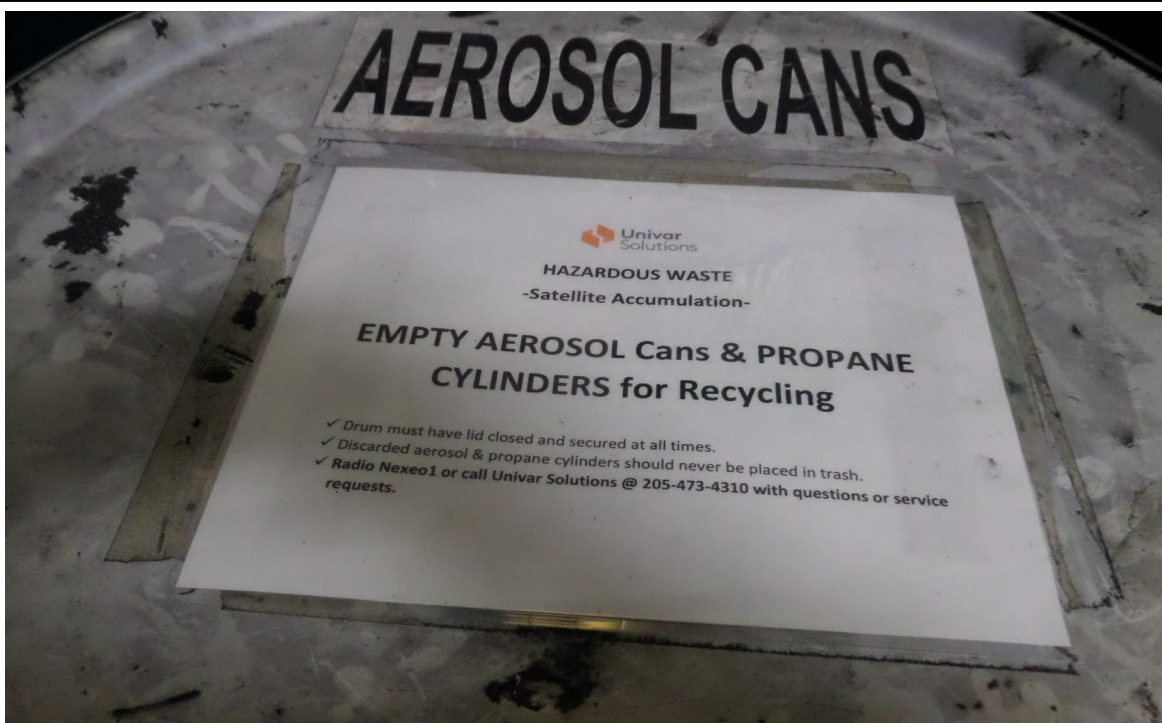
Honda Mfg. of Alabama LLC. 90-Day or Less Accumulation Area Line 2. The waste gasoline is generated from the Line 2 manufacturing process. The waste is then transferred to this 90-Day and accumulated in a SAA. The container was not marked with a date. Photograph 2 taken at 12:45 p.m. (EST).



Honda Mfg. of Alabama LLC. 90-Day or Less Accumulation Area Line 2. The waste D-Limonene rags are generated at the end of the Line 2 assembly area. The waste is then transferred to this 90-Day and accumulated in a SAA. The container was not marked with a date. Photograph 3 taken at 12:45 p.m. (EST).



Honda Mfg. of Alabama LLC. Weld Department for Manufacturing Line 2 SAA. The inspector observed one 55-gallon metal container accumulating aerosol cans not kept closed and not marked or labeled with the words hazardous waste and not labeled with an indication of the hazard of the container contents. Photograph 4 taken at 1:06 p.m. (EST).



Honda Mfg. of Alabama LLC. Weld Department for Manufacturing Line 2 SAA. The inspector observed one 55-gallon metal container accumulating aerosol cans not kept closed and not marked or labeled with the words hazardous waste and not labeled with an indication of the hazard of the container contents. Photograph 5 taken at 1:06 p.m. (EST).



Honda Mfg. of Alabama LLC. Weld Department for Manufacturing Line 2 SAA. The inspector observed one 55-gallon metal container accumulating aerosol cans not kept closed and not marked or labeled with the words hazardous waste and not labeled with an indication of the hazard of the container contents. Photograph 6 taken at 1:06 p.m. (EST).