

RCRA Inspection Report

1) EPA Inspector and Author of the Report

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2) Facility Information

ABB Motors and Mechanical Inc.
70 Industrial Park Access Road
Columbus, Mississippi 39701
EPA ID# MSR000103531
NAICS: 335312 - Motor and General Manufacturing

3) Responsible Official

Mr. Michael Wilson, HSE Manager
ABB Motors and Mechanical Inc.
michael.d.wilson@us.abb.com
(662) 328-9116

4) Inspection Participants

Mr. Michael Wilson, ABB Motors and Mechanical, Inc.
Mr. Randy McIntosh, ABB Motors and Mechanical, Inc.
Mr. David Smith, ABB Motors and Mechanical, Inc.
Mr. David Champagne, U.S. EPA Region 4, Inspector
Mr. Brad Justice, MDEQ Inspector

5) Date of Inspection

March 10, 2021, 09:00 hours

6) Applicable Regulations

Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24

Section 17-17-1 *et seq.* of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.*

Section 17-17-27 of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4), and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of the inspection was to conduct an announced hazardous waste compliance evaluation inspection (CEI) to determine the facility’s compliance with applicable RCRA regulations.

8) Facility Description

ABB Motors and Mechanical Inc. (ABB or facility) is located at 70 Industrial Park Access Road Columbus, Mississippi. The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 20, 2021, characterized the facility as a large quantity generator (LQG) of hazardous waste. The facility opened in July 2006 and employs approximately 260 employees. The facility and operates three shifts Monday through Friday (7AM-3PM; 3PM-11PM; and 11PM-7AM) and occasionally on Saturdays.

According to the Mississippi Department of Environmental Quality Office of Pollution Control's Air Compliance Inspection Report dated May 15, 2019, ABB manufactures large industrial electric motors. On March 20, 2018, the facility's name and owner changed from Balder Electric Company to ABB, Inc. The European-based company, ABB, Inc. bought Balder Electric Company in 2011. On June 28, 2018, the facility's name changed from ABB, Inc. to ABB Motors and Mechanical, Inc. The site is 30.80 acres with one building of 304,000 square-feet. The facility has an Air-Synthetic Minor Operating Permit No. 1680-00065 issued on February 11, 2020 and expires January 31, 2025.

9) Previous Inspection/Compliance History

ABB Motors and Mechanical was last inspected by MDEQ Air II Branch on May 15, 2019 with no violations. On March 29, 2016 the EPA and MDEQ conducted a RCRA CEI and identified 3 violations.

- 40 C.F.R. § 273.15(a) Accumulation Standards for Universal Waste Management
- 40 C.F.R. § 265.173(a) Interim Status Standards for Owners and Operators of Hazardous Waste: Use and Management of Containers
- 40 C.F.R. § 262.34(c)(1)(ii) (2016) and 262.34(d)(2) (2016) Standards Applicable to Generators of Hazardous Waste

10) Findings

Opening Conference

On Thursday March 4, 2021, MDEQ hosted a conference call with the facility to discuss the EPA's and MDEQ's plans to conduct a RCRA Hazardous Waste CEI and to ensure everyone could adhere to the CDC's Covid-19 guidance. On Wednesday March 10, 2021, the EPA and MDEQ inspectors arrived at the facility around 09:00 hours CST and met with Mr. Michael Wilson, HSE Manager, and Mr. Randy McIntosh, Manufacturing Engineer. The inspectors presented their credentials to the team and explained that the purpose of the visit was to conduct a RCRA Hazardous Waste CEI. The facility provided a brief overview of the process and both parties proceeded with a process-based walk through of the facility.

Dip and Bake

The facility processes motors by dipping them in a protective varnish and then baking the motors. EPA Waste Codes D001 and F005 are generated as a result of this process. At the time of the inspection, there were two satellite accumulation area containers for the collection of hazardous waste from mopping up the floor and another for personal protective equipment and miscellaneous debris. Both containers were closed and labeled.

Maintenance and Oil Room

Mr. David Smith, Maintenance Manager, explained that maintenance is conducted on various machines and equipment and used oil is generated. No hazardous waste is generated in this area. At the time of the inspection, there were two (2) 55-gallon containers storing used oil. Both containers were labeled "Used Oil". The facility also manages spent batteries. At the time of the inspection, the spent lead-acid batteries were being sent for recycling.

Maintenance Hazardous

Operations in this location include maintenance on motor winding inserters. Grease is wiped off pads and various aerosols are used during the maintenance of the motors. Aerosols are collected in a 5-gallon SAA container. At the time of the inspection, the SAA container did not have a characteristic labeled identifying the hazardous contents of the container (Photograph 1 of 2).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 an indication of the hazards of the contents.

Tool Room

Storage for various power tools are kept in this area. At the time of the inspection, there was one (1) 2.5-gallon container of Universal Waste Batteries labeled and dated (9/14/2020) and one (1) 5-gallon container of aerosols labeled "Hazardous Waste" but missing the characteristic label identifying the hazardous contents of the container (Photograph 2 of 2).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 an indication of the hazards of the contents.

Maintenance Workshop

Metal shavings from drilling steel and cast-iron lifting eyes used to lift motors are collected and recycled in this area. No hazardous waste was being generated in this area at the time of the inspection.

Vacuum Pressure Impregnated (VPI) Varnish Area

Motors are processed through a vacuum pressure impregnation. The motors are completely submerged with the insulation varnish and through a combination of dry and wet vacuum and pressure cycles, resin is integrated throughout the insulation system. At the time of the inspection, one (1) 55-gallon container of hazardous waste was labeled "Hazardous Waste", identified as UN1993 waste varnish thinner, and contained EPA Waste Code D001. The container had the hazardous characteristic label identifying the hazardous contents of the container and was closed. An additional 5-gallon container was being used to collect excluded solvent contaminated rags. This container was closed and labeled.

Rotor Prime Booth

Rotors go through a paint priming process where acetone and ethylbenzene are used. Paint sludge and stripping solvent are generated and collected. At the time of the inspection, there was one (1) 55-gallon container of D001, D035, F003, F005 hazardous waste. This container was labeled and closed.

Cast-Iron Prime Booth

Paint priming of cast-iron materials used in the construction of the motors are prepared in this location. Paint sludge and stripping solvent are generated and collected. At the time of the inspection, one (1) 55-gallon container of D001, D035, F003 and F005 hazardous waste was labeled and closed. Excluded solvent contaminated rags are also generated and collected in a 5-gallon container in this area. At the time of the inspection, this container was labeled and closed.

Evaporator Area

Spent coolant synthetic oil is collected in this area. Metal shavings soaked in oil are drained and collected in a floor drain and subsequently pumped to 55-gallon containers for storage. At the time of the inspection, there were approximately twenty (20) 55-gallon containers of used oil. All containers were labeled "Used Oil". Dried varnish is also collected in this area and is sent off as non-hazardous waste. No hazardous waste is generated in this area.

90-Day Central Accumulation Area

At the time of the inspection, the 90-day central accumulation area (CAA) was empty. The area was fenced, locked, and signage was affixed to the fence indicating emergency contacts. The fence door was easily maneuvered to open with the gate locked. The inspection team recommended an alternative option to secure the area.

Foundry

Located in this area was a parts washer that is serviced every 90-days. Used broach filters are collected for disposal. At the time of the inspection, there was one (1) 55-gallon of EQO-Pure waste material that was not labeled and was not closed. A materials safety data sheet (MSDS) identified the material as a heavy-duty vegetable-derived micro-emulsion fluid with extreme pressure additives formulated to improve tool life and part quality while eliminating foaming and staining.

Final Paint Area

This area consists of two separate paint booths. At the time of the inspection there was one (1) 5-gallon container used for storing punctured aerosols. One (1) 55-gallon container storing EPA waste codes D001, D035, F003, F005 from the generation of paint sludge and stripping solvent waste at one booth and another 55-gallon container stationed at the other paint booth collecting the same waste. Both stations utilize one (1) 55-gallon container for the collection of paint can waste and carbon filters labeled with EPA waste codes D001, D035, F003 and F005. All three (3) containers were labeled and closed.

Records

On March 4, 2021, the inspection team requested record-keeping documentation be emailed to order to adhere to CDC Guidelines for social distancing during the Covid-19 pandemic. On March 8, 2021, Mr. Wilson emailed the EPA and MDEQ the following record-keeping documentation for the facility: Hazardous Waste Training Records for facility personnel document the attendees' names and job titles; The Quick Reference Guide and Contingency Plan; All inspection records and manifests dating back 3 years were provided; and Hazardous Waste Inspection Records of the storage area.

11. Summary

The inspectors conducted the exit meeting with facility team presenting the preliminary results of the inspection. ABB Motors and Mechanical, Inc. was inspected as a large quantity generator of hazardous waste. At the time of the inspection, the facility did not appear to be in compliance with some requirements of RCRA. The inspection concluded at approximately 14:00 hours.

12) Signed



David Champagne
Physical Scientist

4/20/2021

Date

13) Concurrence

ARACELI Digitally signed by
CHAVEZ ARACELI CHAVEZ
Date: 2021.04.20
13:35:59 -04'00'

Araceli Chavez
Chief
RCRA Enforcement Section

Date

Photographs of ABB Motors and Mechanical, Inc.
70 Industrial Park Access Road
Columbus, Mississippi 39701
EPA ID# MSR000103531
Camera Model: Google Pixel XL
By: David Champagne



Photograph 1 of 2: SAA Container for hazardous waste aerosols



Photograph 2 of 2: SAA container used to hazardous waste aerosols