

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

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EPA ID# SCD987579109

3) Responsible Official

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4) Inspection Participants

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Courtney Grayson, MacLean Power
Jeff Slocum, MacLean Power
Scott Walters, MacLean Power

Elizabeth DeLanghe, SCDHEC
Tom Richmond, SCDHEC
Laurie Benton DiGaetano, US EPA

5) Date of Inspection

May 19, 2022

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), South Carolina Hazardous Waste Management Regulations (S.C. Code Ann. Regs) 61-79, 260 through 270, 273, 278, & 279; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(a)(26) [40 C.F.R. § 261.4(a)(26)], solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the conditions listed in R.61-79.261.4(a)(26) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(a)(26)] are met (hereinafter referred to as the “Solvent-Contaminated Reusable Wipe Exclusion”).

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 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 44-56-60(a)(2) and (b)(3) 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) or R.61-79.262.17(a) [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”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], a large quantity generator 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)(3) 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”).

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine MacLean Power System’s compliance with the applicable requirements of RCRA and the corresponding SCDHEC regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

SCDHEC has conducted six RCRA CEIs at the subject facility since calendar year 2000 and found two or more violations during each of those inspections. SCDHEC has issued formal enforcement actions at the facility in 2001, 2003, and 2012.

On August 23, 2016, SCDHEC conducted the most recent RCRA CEI at the subject facility and found apparent violations of RCRA’s requirements for hazardous waste container management, universal waste container management, hazardous waste training, and the contingency plan. As a result, SCDHEC issued a warning letter to MPS on October 31, 2016.

9) **Facility Description**

MacLean Power Systems (MPS), a division of MacLean-Fogg Company, manufactures and supplies products for electric utility, communication, and civil infrastructure markets. The subject MPS facility specializes in the fabrication and assembly of insulators for power distribution companies. These insulators may be formed on-site using one of twelve mold presses or two silicone extrusion lines. Extruded products are cured in one of five on-site ovens. Final assembly of the extruded and molded products may include crimping the ends of insulator rods in preparation for customer use.

MPS operates in a 210,000 square foot building on approximately 2.6 acres of developed land on a 39.6-acres parcel in York, South Carolina. Operations at the subject facility began in 1980, and the site name was changed from Sediver, Inc. to MacLean Power York on May 1, 1997. The facility currently operates under the NAICS Code 335932 for Noncurrent-Carrying Wiring

Device Manufacturing. Operations run 24 hours per day, five days per week, and the facility currently has approximately 315 employees.

MPS has been operating as a large quantity generator of hazardous waste (LQG) at this location since September 25, 2014. The facility primarily generates hazardous waste spent naphtha from dipping fiberglass parts in naphthalene solution, hazardous waste isopropyl alcohol from cleaning dirt from fiberglass poles, and solvent contaminated rags from wiping used solvents from parts and equipment. The facility has designated seven (7) hazardous waste satellite accumulation areas (SAAs), one hazardous waste central accumulation area (CAA), and one universal waste storage area. According to facility personnel, operators at each SAA will notify a material handler when a container at the SAA is full and ready for transfer to the CAA. The material handler then comes to the SAA, picks up the full container, weighs it, and places it in the CAA until it is picked up by the waste hauler for transport to a permitted treatment, storage, or disposal facility. MPS reported generation of the following hazardous wastes at this location during calendar year 2017:

<u>Waste Description</u>	<u>EPA Waste Code</u>	<u>Pounds</u>
Flammable liquid naptha methoxysilane	D001 / D018 / F003	6,073
Flammable solid IPA wipes	D001	4,971
Acetone	D001 / F003	7,370

10) **Opening Conference**

On May 19, 2022, EPA inspector Laurie Benton DiGaetano, accompanied by SCDHEC inspectors Tom Richmond and Elizabeth DeLanghe, arrived at the subject MPS facility at approximately 9:10 a.m. Scott Jamieson, Vice-President and General Manager, immediately received the inspectors. Mr. Jamieson and the inspectors were joined by Jeff Slocum, EHS Maintenance and Facilities Manager, Scott Walters, Director of Operations, and Courtney Grayson, Environmental, Health and Safety Engineer, for the opening conference. The inspectors introduced themselves, showed their credentials to Mr. Jamieson and Mr. Walters, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The inspectors discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The EPA also explained that 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 that the EPA has information sheet for small businesses. This sheet can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

During the opening conference, Ms. Grayson led the inspectors through a PowerPoint presentation concerning health and safety protocols at the facility, and facility representatives provided an overview of the facility's history and current operations. The inspection participants

also discussed health and safety protocols and required personal protective equipment before Mr. Slocum, Mr. Walters, and Ms. Grayson led the inspectors on a tour of the Facility operations.

11) **Findings**

Fiber One Single Spin Machine Area: At the time of the inspection, MPS was managing a SAA for accumulating hazardous waste naphtha primer liquid mixture in the Fiber One Single Spin Machine Area. Facility personnel explained that this area was used to test a procedure for mixing primer for use in the Molded Area. Facility personnel stated that MPS recently decided against using this procedure and will use a premixed primer instead. However, the SAA had not yet been taken out of service.

The inspectors observed three 55-gallon drums on portable secondary containment pallets at this SAA (Photo 1). The first 55-gallon drum contained virgin naphtha, the second contained virgin prime coat, and the third contained hazardous waste naphtha primer mixture. The 55-gallon drum containing hazardous waste naphtha primer liquid mixture was equipped with a funnel to receive hazardous waste naphtha primer liquid mixture (Photo 2). The container was not labeled; and although hazardous waste was not being actively added to or removed from the container, the funnel was open. The inspectors observed material filling the portable secondary containment pallet, which was open and not labeled. It appeared that this material had spilled from the containers and into the secondary containment pallet, where it had hardened.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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 S.C. Code Ann. Regs. 61-79.262.15(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.

1388 Area: The inspectors observed an open trash can containing hardened primer in the 1388 Area (Photo 3). Facility personnel explained that this material is swept up from the floor beneath the molding unit. On June 3, 2022, SCDHEC sent an email to MPS requesting documentation that would support the determination that this material is not a hazardous waste, but the inspectors have not yet received this documentation.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11(f) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator’s knowledge of the waste and support the generator’s determination, as described at paragraphs (c) and (d) of this section.

Sandblaster Area: The inspectors observed a bead blaster unit in the Sandblaster Area. Facility personnel stated that the unit is used to remove rubber from the molds and that if the unit were to generate any spent media, it would likely be managed as non-hazardous waste.

Cut Out Area: MPS manages one SAA for accumulating spent isopropanol in the Cut-Out Area. Facility personnel explained that virgin isopropyl alcohol is dispensed into a two-gallon flammable can, which is placed on a mobile cart. The cart is transferred throughout the area so that machine parts can be immersed into a tray of isopropyl alcohol. Clean parts are then removed from the tray of isopropyl alcohol and wiped dry with a cloth rag. Spent isopropyl alcohol is eventually poured from the tray into the 55-gallon drum in the SAA.

The inspectors observed two 55-gallon drums and a spill kit on portable secondary containment at this SAA (Photo 4). The first 55-gallon drum contained virgin isopropyl alcohol and the second contained hazardous waste isopropanol. The 55-gallon drum containing spent isopropyl alcohol was labeled D001 hazardous waste isopropanol, identified with a DOT flammable liquid hazard placard, and equipped with a latched funnel.

Arresters SAA: MPS manages one SAA for accumulating spent isopropanol in the Arresters Area. Facility personnel explained that virgin isopropyl alcohol is dispensed into a two-gallon flammable can, which is placed on a mobile cart. The cart is transferred throughout the area so that machine parts can be immersed into a tray of isopropyl alcohol. Clean parts are then removed from the tray of isopropyl alcohol and wiped dry with a cloth rag. Spent isopropyl alcohol is eventually poured from the tray into the 55-gallon drum in the SAA.

The inspectors observed three 55-gallon drums on two portable secondary containment pallets at this SAA. The first 55-gallon drum contained virgin isopropyl alcohol, the second contained nonhazardous oil and Oil Dri ®, and the third contained hazardous waste isopropanol. The 55-gallon drum containing spent isopropyl alcohol was labeled D001 hazardous waste isopropanol and identified with a DOT flammable liquid hazard placard. The drum was equipped with a latched funnel, and the area was equipped with a spill kit.

Compositz SAA: MPS manages one SAA for accumulating spent isopropanol in the Compositz Area. Facility personnel explained that virgin isopropyl alcohol is dispensed into a two-gallon flammable can, which is placed on a mobile cart. The cart is transferred throughout the area so that machine parts can be immersed into a tray of isopropyl alcohol. Clean parts are then removed from the tray of isopropyl alcohol and wiped dry with a cloth rag. Spent isopropyl alcohol is eventually poured from the tray into the 55-gallon drum in the SAA.

The inspectors observed two 55-gallon drums on portable secondary containment at this area. The first 55-gallon drum contained virgin isopropyl alcohol and the second contained hazardous waste isopropanol. The 55-gallon drum containing spent isopropyl alcohol was labeled D001 hazardous waste isopropanol and identified with a DOT flammable liquid hazard placard. The drum was equipped with a latched funnel, and the area was equipped with a spill kit. The inspectors also observed an open bin of used solvent contaminated wipes in the SAA (Photo 5). Facility personnel explained that Cintas picks up the used wipes and replaces them with clean ones. Cintas takes the used wipes off-site to be laundered for reuse. The inspectors noted that the used wipes were damp, they were in an open bin, and the bin was not labeled.

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(a)(26)(i) [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, solvent-contaminated wipes, when accumulated, stored, and transported, must be

contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

Caged CAA: MPS manages a hazardous waste CAA with virgin materials inside a caged area near the back exit of the building. The area is surrounded by a chain link fence, and containers of hazardous waste are stored on portable secondary containment pallets. The building is equipped with portable fire extinguishers, fire alarm pull-stations, automatic sprinklers, spill control equipment and emergency showers and eyewash stations, and personnel carry cell phones capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams. However, the CAA is not equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel, and the nearest emergency shower and eyewash station is located next to the Compositz SAA. Although the facility is designated as a no-smoking facility, the CAA was not identified with “No Smoking” signs.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(vi)(B) [40 C.F.R. § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, “no smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.252(a) and (c) [40 C.F.R. § 262.252(a) and (c)], and is a condition of the LQG Permit Exemption, areas where hazardous waste is generated or accumulated onsite must be equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; and decontamination equipment.

In the far corner immediately to the left inside the entrance to the caged CAA, the inspectors observed eight 55-gallon drums (Photo 6). One drum was labeled D001 hazardous waste flammable liquids (naphtha, propyl acetate), identified as flammable liquids, and dated May 19, 2022. The remaining drums were labeled nonhazardous waste.

In the near corner immediately to the left inside the entrance to the caged CAA, the inspectors observed six 55-gallon drums on portable secondary containment pallets (Photo 7):

- One labeled hazardous waste flammable liquid and dated May 17, 2022;
- One identified as flammable liquid, dated May 18 without a year, and not labeled as hazardous waste;
- One with a ripped hazardous waste label, identified as flammable liquid and dated May 19, 2022;
- One labeled D001 hazardous waste isopropyl alcohol, identified as flammable liquid, and dated May 18 without a year;

- One labeled D001 hazardous waste IPA, identified as flammable liquid, and dated May 18 without a year; and
- One with a hazardous waste label facing the wall, with no visible indication of hazards, and dated May 14, 2022.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label containers with the words “Hazardous Waste;” with an indication of the hazards of the contents; and with the date upon which each period of accumulation begins clearly visible for inspection on each container.

Outside Caged Area SAA: MPS manages one SAA for accumulating heels left in 55-gallon drums of virgin isopropanol. The inspectors observed one 55-gallon drum on a portable secondary containment pallet in this area, which is located outside the caged CAA (Photo 8). The 55-gallon drum was labeled D001 hazardous waste isopropyl alcohol and identified with a DOT flammable liquid hazard placard. Although hazardous waste was not being actively added to or removed from the container, the bung had been removed from the drum, leaving the container open.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(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.

MPS also manages universal waste outside the caged CAA. The inspectors observed one box of 8-ft spent fluorescent lamps, two boxes of 4-ft spent fluorescent lamps, one 5-gallon bucket of broken lamps, and one 5-gallon bucket of mercury containing equipment in this area (Photos 9 and 10). Each box of spent lamps was labeled universal waste fluorescent lamps, but the bucket of broken lamps was labeled universal waste broken bulbs (not “lamps”). The bucket of mercury containing equipment was labeled universal waste mercury containing equipment. The 8-ft box and one 4-ft box were open.

Pursuant to S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container or package in which such lamps are contained clearly with one of the following phrases: “Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”

Pursuant to S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a SQHUW must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Records indicate that the most recent shipment of universal waste was sent to CleanLights on March 11, 2022. The shipment included universal waste batteries, ten boxes of 4-ft universal

waste fluorescent lamps and one box of 8-ft universal waste fluorescent lamps. However, none of the containers of universal waste were marked with an accumulation start date or other method to clearly demonstrate the length of time that the universal waste had been accumulated on-site.

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], a SQHUW must be able to clearly demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Molded Area Primer Station SAA: MPS manages one SAA for accumulating spent naphtha propyl acetate in the Molded Area Primer Station. Facility personnel explained that virgin naphtha propyl acetate is dispensed into small sinks at work-stations throughout the area and machine parts are immersed into the sinks. Clean parts are then removed from the sink and wiped dry with a cloth rag. Spent naphtha propyl acetate is eventually drained from each sink into a 5-gallon container, which is then taken to the SAA where the contents are poured into a 55-gallon drum.

The inspectors observed two 55-gallon drums and six 5-gallon containers on portable secondary containment at this SAA (Photo 11). The first 55-gallon drum contained virgin naphtha propyl acetate, and the second contained hazardous waste naphtha propyl acetate. All of the 5-gallon containers were empty. The 55-gallon drum containing spent naphtha propyl acetate was labeled D001 hazardous waste isopropanol and identified with a DOT flammable liquid hazard placard. The drum was equipped with a funnel, and although hazardous waste was not being actively added to or removed from the container, the funnel was not latched (Photo 12).

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(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.

Maintenance Area: MPS accumulates used oil and oily rags in the Maintenance Area. The inspectors observed one 55-gallon drum with a latched flip-top lid labeled nonhazardous oily rags and one tote labeled nonhazardous used oil in this area. The inspectors also observed an open funnel inside the open bung on the top of the used oil tote.

SmartFoam Part A & B SAA: MPS manages one SAA for accumulating spent aerosol cans in the SmartFoam Part A & B Area. The inspectors observed three 55-gallon drums on portable secondary containment at this SAA. The first two 55-gallon drums contained non-RCRA SmartFoam A & B liquid wastes, and the third contained spent aerosol cans (Photo 13). The inspectors reviewed waste profiles for the SmartFoam A & B wastes. The 55-gallon drum containing spent aerosol cans was labeled D001 hazardous waste aerosols and identified as flammable. The drum was equipped with a flip-top lid that did not make complete contact between the lid and the rim all around the top of the container.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(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.

Teflon Room SAA: MPS manages two SAAs in the Teflon Room. Facility personnel explained that excess paint and alcohols used to clean equipment in this area is accumulated in one SAA as D001 / D007 hazardous waste flammable liquids, and that any paint-contaminated solids, such as used rags or filters from the spray booth, are accumulated in the second SAA as D007 hazardous waste solids.

The inspectors observed one 55-gallon drum on a portable secondary containment pallet in the first SAA (Photo 14) and another 55-gallon drum on a drum compactor in the second SAA (Photo 15). The first drum was labeled D001 / D007 hazardous waste and identified with a DOT flammable liquid hazard placard, but it was not marked to indicate that the contents are toxic. The second drum was labeled D007 hazardous waste solid (chromium) and identified with a DOT class 9 hazard placard, but it was not marked to indicate that the contents are toxic.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [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 also observed a bead blaster unit in this area. Facility personnel stated that the unit is used to clean paint from parts, but that spent blast media has never been removed from the unit. The inspectors advised that a hazardous waste determination should be performed on spent blast media pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] if that material is ever removed from the unit or if the unit is taken out of service.

Contingency Plan: The inspectors reviewed the facility's available Contingency Plan, Emergency Action Plan and Quick Reference Guide, and MPS personnel stated that the Fire Marshall was scheduled to visit the facility within the next two weeks to provide advice and feedback on the plans. The facility's Emergency Action Plan and corresponding quick reference guide, which were last updated on November 5, 2021, describe actions facility personnel must take in response to a medical emergency, fire, severe weather, bomb threat, chemical spill, violent intruder, civil unrest or disturbance, plant shutdown or lockdown, or earthquake.

The Emergency Action Plan also includes an evacuation plan and map for personnel and a list of emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, fire protection equipment, evacuation equipment, first aid equipment and other tools. The plan includes a brief outline of the capabilities of each item on the list, but only describes the location of the equipment as "around the plant."

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.261(e) [40 C.F.R. § 262.261(e)], and is a condition of the LQG Permit Exemption, the contingency plan must include a list of all emergency equipment at the facility where this equipment is required.

This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

The Emergency Action Plan lists the names and emergency telephone numbers for persons identified as emergency coordinators, and those individuals are listed in the order in which they will assume responsibility. The plan also describes arrangements agreed to with the York County Office of Emergency Management, York Fire Department, Piedmont Hospital, and Chemtrec, but does not describe arrangements agreed to with the local police department. MPS did not provide documentation that the Emergency Action Plan had been submitted to the police department, fire department, hospital, State and local emergency response teams or the Local Emergency Planning Committee.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.261(c) [40 C.F.R. § 262.261(c)], and is a condition of the LQG Permit Exemption, the contingency plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or, if applicable, the Local Emergency Planning Committee.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a generator is required to submit a copy of the contingency plan and all revisions to all local emergency responders. This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

The facility's laminated quick reference guide flip-book was readily available and posted in the facility. The first page listed the important telephone numbers necessary to call for help in the event of an emergency. The remainder of the guide included laminated color-coded pages of increasing length arranged as a flip-book on a clipboard. One page was dedicated to describing the response activities for each of the following topics: Minor Fire, Major Fire, Earthquake, Evacuation, Shelter in Place (severe weather), Chemical Spill, Bomb Threat, Medical Emergency, Plant Shutdown, and Workplace Violence.

The quick reference guide did not include the types/names of hazardous waste in layman's terms and the associated hazard 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 map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; or the identification of on-site notification systems; and the guide had not been provided to the local police departments, fire departments, hospitals, or State and local emergency response teams that may be called upon to provide emergency services.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)],

and is a condition of the LQG Permit Exemption, a generator that is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) the types / names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time; (2) the estimated maximum amount of each hazardous waste that may be present at any one time; (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and route3s for accessing these wastes; (5) a street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; and (6) the locations of water supply; (7) the identification of on-site notification systems.

Training Records: MPS did not have job descriptions and employee names that include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to positions related to hazardous waste management. MPS also did not have a written description of the type and amount of both introductory and continuing training to be given to each person filling a position related to hazardous waste management. However, records indicate that MPS provides annual hazardous waste training during plant-wide hazard communication training events. The most recent plant-wide hazardous waste training was provided on May 10, 2022. According to facility personnel, the current Environmental Health and Safety Engineer began working at the facility in July 2020, but records indicate that this employee's initial RCRA training was not completed until March 19, 2021 (eight months later).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7)(ii) [40 C.F.R. § 262.17(a)(7)(ii)], which is a condition of the LQG Permit Exemption, facility personnel must successfully complete a program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part within six months after the date of their employment or assignment to the facility.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the LQG must maintain the following documents and records at the facility: (A) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; (B) a written job description for each position at the facility related to hazardous waste management; (C) a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and (D) records that document that the training or job experience, required in this section, has been given to, and completed by, 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 January 2019. Personnel stated that the previous Environmental Health and Safety Engineer left the facility in 2019, and the position was not filled until July 2020.

Pursuant to S.C. Code Ann. Regs. 61-79.262.41 [40 C.F.R. § 262.41], each LQG who ships any hazardous waste offsite to a treatment, storage or disposal facility within the United States must prepare and, no later than thirty (30) days after the end of each calendar quarter, submit a written report to the Department including, but not limited to, (1) the EPA identification number, name and address of the generator; (2) the calendar quarter covered by the report; (3) the EPA identification number, name and address for each offsite treatment, storage, or disposal facility in the United States to which waste was shipped during the quarter; (4) the name and EPA identification number of each transporter used during the reporting quarter for shipments to a treatment, storage or disposal facility within the United States; (5) a description the EPA hazardous waste number, DOT hazardous class, and quantity of each hazardous waste shipped offsite for shipments to a treatment, storage, or disposal facility within the United States. This information must be listed by the EPA identification number of each such facility to which waste was shipped; (6) the types and quantities of such wastes shipped for offsite treatment and disposal; (7) the types and quantities of such waste remaining in storage at the end of the reporting period; and (8) certification of information signed by the generator or his authorized representative.

Solvent Contaminated Wipes: Facility personnel stated that solvent-contaminated wipes are picked up by Cintas for laundering and reuse. The inspectors did not review records for shipments of solvent-contaminated wipes being sent off-site for laundering or dry-cleaning; documentation of the name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day time limit in 40 C.F.R.

§ 261.4(a)(26)(ii) is being met; or a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning. On June 3, 2022, SCDHEC sent an email to MPS requesting records for solvent contaminated wipes, but the inspectors have not yet received these records.

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(a)(26)(v) [40 C.F.R. § 261.4(a)(26)(v)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, generators must maintain (A) the name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; (B) documentation that the 180 day accumulation time limit is being met; and (C) a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for disposal.

Inspection Records: MPS scans records of inspections of the hazardous waste central accumulation area (CAA) and maintains the records electronically. The inspectors viewed the electronic folders and reviewed selected individual inspection records. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The checklist includes a method to record observations whether or not the area is free of debris; the floor is clean and dry; the tops of the containers are clean; the area is free of leaks or spills; the containers are in good condition; the containers are closed; the containers are labeled hazardous waste; the labels include the generator address, date, EPA ID and waste number; the labels are legible; the wastes have been on-site for less than 90 days; the containers are compatible with their contents; incompatible wastes are

stored separately; aisle space is adequate; universal waste area is organized; and universal waste containers are labeled. No weekly inspections were conducted during the time that the Environmental Health and Safety Engineer position was vacant from 2019 until July 2020.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking container and for deterioration of containers caused by corrosion or other factors.

12) **Closing Conference**

The inspectors conducted the exit meeting with Scott Jamieson, Jeff Slocum, Scott Walters, and Courtney Grayson. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) **Inspection Findings**

Based on the observations made during the inspection, MPS was apparently deficient with the following RCRA requirements:

- **S.C. Code Ann. Regs. 61-79.261.4(a)(26)(i) [40 C.F.R. § 261.4(a)(26)(i)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion.**
 - **(Page 5)** The inspectors observed an open bin of used solvent contaminated wipes in the Compositz SAA. The used wipes were damp, they were in an open bin, and the bin was not labeled. **(Photo 5)**
- **S.C. Code Ann. Regs. 61-79.261.4(a)(26)(v) [40 C.F.R. § 261.4(a)(26)(v)], which is a condition of the Solvent-Contaminated Reusable Wipes Exclusion, generators must maintain (A) the name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; (B) documentation that the 180 day accumulation time limit is being met; and (C) a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for disposal.**
 - **(Page 12)** On June 3, 2022, SCDHEC sent an email to MPS requesting records for solvent contaminated wipes, but the inspectors have not yet received these records. The inspectors did not review records for shipments of solvent-contaminated wipes being sent off-site for laundering or dry-cleaning; documentation of the name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day time limit is being met; or a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for laundering or dry cleaning.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.11(f) [40 C.F.R. § 262.11(f)], an LQG must maintain records supporting its hazardous waste determinations. These records must comprise the generator's knowledge of the waste and support the generator's determination, as described at paragraphs (c) and (d) of this section.**

- **(Page 4)** The inspectors observed an open trash can containing hardened primer in the 1388 Area. On June 3, 2022, SCDHEC sent an email to MPS requesting documentation that would support the determination that this material is not a hazardous waste, but the inspectors have not yet received this documentation.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.15(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.**
 - **(Page 4)** The inspectors observed one 55-gallon drum of hazardous waste naphtha primer liquid mixture equipped with a funnel to receive hazardous waste naphtha primer liquid mixture in the Fiber One Single Spin Machine Area SAA. The container was not labeled; and although hazardous waste was not being actively added to or removed from the container, the funnel was open. The inspectors also observed material filling the portable secondary containment pallet, which was also open and not labeled. **(Photo 2)**
 - **(Page 7)** The inspectors observed one 55-gallon drum on a portable secondary containment pallet in the SAA located outside the caged CAA. The container was labeled D001 hazardous waste isopropyl alcohol and identified with a DOT flammable liquid hazard placard. The bung had been removed from the drum, leaving the container open. **(Photo 8)**
 - **(Page 8)** The inspectors observed one 55-gallon drum of hazardous waste naphtha propyl acetate on a portable secondary containment unit in the Molded Area Primer Station SAA. The drum was labeled D001 hazardous waste isopropanol and identified with a DOT flammable liquid hazard placard. The drum was equipped with a funnel, and although hazardous waste was not being actively added to or removed from the container, the funnel was not latched **(Photo 12)**.
 - **(Page 9)** The inspectors observed one 55-gallon drum labeled D001 hazardous waste aerosols and identified as flammable in the SmartFoam Part A&B SAA. The drum was equipped with a flip-top lid that did not make complete contact between the lid and the rim all around the top of the container **(Photo 13)**.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [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.**
 - **(Page 9)** The inspectors observed one 55-gallon drum on a portable secondary containment pallet in the first SAA inside the Teflon Room and another 55-gallon drum on a drum compactor in the second SAA inside the Teflon Room. The first drum was labeled D001 / D007 hazardous waste and identified with a DOT flammable liquid hazard placard, but it was not marked to indicate that the contents are toxic. The second drum was labeled D007 hazardous waste solid (chromium) and identified with a DOT

Class 9 hazard placard, but it was not marked to indicate that the contents are toxic.
(Photo 14-15)

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking container and for deterioration of containers caused by corrosion or other factors.**
 - (Page 13) No weekly inspections of the CAA were conducted during the time that the Environmental Health and Safety Engineer position was vacant from 2019 until July 2020.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(vi)(B) [40 C.F.R. § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, “no smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.**
 - (Page 6) The facility manages flammable waste in the CAA. Although the facility is designated as a no-smoking facility, the CAA was not identified with “No Smoking” signs.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label containers with the words “Hazardous Waste;” with an indication of the hazards of the contents; and with the date upon which each period of accumulation begins clearly visible for inspection on each container.**
 - (Page 7) The inspectors observed the following 55-gallon drums of hazardous waste in the CAA: one drum, which was dated 05/18 without a year, and not labeled as hazardous waste; one drum with a ripped hazardous waste label; two drums, which were each dated 05/18 without a year; and one drum with no indication of hazards of its contents clearly visible for inspection. (Photo 7)
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.252(a) and (c) [40 C.F.R. § 262.252(a) and (c)], and is a condition of the LQG Permit Exemption, areas where hazardous waste is generated or accumulated onsite must be equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; and decontamination equipment.**
 - (Page 6) The CAA was not equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel, and the nearest emergency shower and eyewash station is located next to the Compositz SAA.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.261(c) and (e) [40 C.F.R. § 262.261(c) and (e)], and is a condition of the LQG Permit Exemption, the contingency plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local**

hospitals, or, if applicable, the Local Emergency Planning Committee; and it must include a list of all emergency equipment at the facility where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

- **(Page 10)** The Emergency Action Plan describes arrangements agreed to with the York County Office of Emergency Management, York Fire Department, Piedmont Hospital, and Chemtrec, but it does not describe arrangements agreed to with the local police department(s).
- **(Page 10)** The Emergency Action Plan includes a list of emergency equipment at the facility and includes a brief outline of the capabilities of each item on the list. However, the plan only describes the location of the equipment as “around the plant.”
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a generator is required to submit a copy of the contingency plan and all revisions to all local emergency responders. This document may also be submitted to the Local Emergency Planning Committee, as appropriate.**
 - **(Page 10)** MPS did not provide documentation that the Emergency Action Plan had been submitted to the police department, fire department, hospital, State and local emergency response teams or the Local Emergency Planning Committee.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a generator that is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) the types / names of hazardous wastes in layman’s terms and the associated hazard associated with each hazardous waste present at any one time; (2) the estimated maximum amount of each hazardous waste that may be present at any one time; (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and route3s for accessing these wastes; (5) a street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; and (6) the locations of water supply; (7) the identification of on-site notification systems.**
 - **(Page 10)** The quick reference guide did not include the types/names of hazardous waste in layman’s terms and the associated hazard 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 map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; or the identification of on-site notification systems; and the guide had not been provided to the

local police departments, fire departments, hospitals, or State and local emergency response teams that may be called upon to provide emergency services.

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7)(ii) [40 C.F.R. § 262.17(a)(7)(ii)], which is a condition of the LQG Permit Exemption, facility personnel must successfully complete a program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part within six months after the date of their employment or assignment to the facility.**
 - **(Page 11)** The facility's Environmental Health and Safety Engineer began working at the facility in July 2020, but records indicate that this employee's initial RCRA training was not completed until March 19, 2021 (eight months later).
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the LQG must maintain the following documents and records at the facility: (A) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; (B) a written job description for each position at the facility related to hazardous waste management; (C) a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and (D) records that document that the training or job experience, required in this section, has been given to, and completed by, facility personnel.**
 - **(Page 11)** MPS did not have job descriptions and employee names that include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to positions related to hazardous waste management. MPS also did not have a written description of the type and amount of both introductory and continuing training to be given to each person filling a position related to hazardous waste management.
- **Pursuant to S.C. Code Ann. Regs. 61-79.262.41 [40 C.F.R. § 262.41], each LQG who ships any hazardous waste offsite to a treatment, storage or disposal facility within the United States must prepare and, no later than thirty (30) days after the end of each calendar quarter, submit a written report to the Department including, but not limited to, (1) the EPA identification number, name and address of the generator; (2) the calendar quarter covered by the report; (3) the EPA identification number, name and address for each offsite treatment, storage, or disposal facility in the United States to which waste was shipped during the quarter; (4) the name and EPA identification number of each transporter used during the reporting quarter for shipments to a treatment, storage or disposal facility within the United States; (5) a description the EPA hazardous waste number, DOT hazardous class, and quantity of each hazardous waste shipped offsite for shipments to a treatment, storage, or disposal facility within the United States. This information must be listed by the EPA identification number of each such facility to which waste was shipped; (6) the types and quantities of such wastes shipped for offsite treatment and disposal; (7) the types and quantities of such waste remaining in storage at the end of the reporting period; and (8) certification of information signed by the generator or his authorized representative.**

- (Page 11) MPS did not submit quarterly reports during calendar year 2019 or for the first three quarters of calendar year 2020. In addition, non-routine hazardous wastes were shipped offsite following an inventory clean-out, which occurred in calendar year 2021. The quarterly report for the second quarter of 2021 did not include those non-routine hazardous wastes, which were shipped on June 2, 2021.
- Pursuant to S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a SQHUW must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
 - (Page 7) The inspectors observed one box of 8-ft spent fluorescent lamps, two boxes of 4-ft spent fluorescent lamps, one 5-gallon bucket of broken lamps, and one 5-gallon bucket of mercury containing equipment in the universal waste management area. The 8-ft box and one 4-ft box of spent fluorescent lamps were open. (Photo 9)
- Pursuant to S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container or package in which such lamps are contained clearly with one of the following phrases: “Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s).”
 - (Page 7) The inspectors observed one box of 8-ft spent fluorescent lamps, two boxes of 4-ft spent fluorescent lamps, one 5-gallon bucket of broken lamps, and one 5-gallon bucket of mercury containing equipment in the universal waste management area. The bucket of broken lamps was labeled universal waste broken bulbs (not “lamps”).
- Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], a SQHUW must be able to clearly demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.
 - (Page 8) None of the containers of universal waste were marked with an accumulation start date or other method to clearly demonstrate the length of time that the universal waste had been accumulated on-site.

14) List of Appendices

Appendix 1 – Photo Log:

15 Photos taken on: May 19, 2022

Photos taken by: Laurie Benton DiGaetano

Photos taken with: Panasonic DMC TS-5 Digital Camera

EPA Property Tag: S09533

15) Signed

Digaetano, Laurie Digitally signed by Digaetano, Laurie
Date: 2022.06.30 18:44:46 -04'00'

Laurie Benton DiGaetano

Senior Enforcement and Compliance Specialist

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2022.07.01 09:51:15 -04'00'

Araceli B. Chavez

Chief

RCRA Enforcement and Compliance Section



Photo 1: Three 55-gallon drums on portable secondary containment pallets at the Fiber One Single Spin Machine Area SAA. The drum on the left, which contains hazardous waste naphtha primer liquid mixture, was not closed or labeled.



Photo 2: Open funnel in the container of hazardous waste naphtha primer liquid mixture at the Fiber One Single Spin Machine Area SAA.



Photo 3: Open trash can containing hardened primer in the 1388 Area.



Photo 4: Two 55-gallon drums and a spill kit at the Cut Out Area SAA. The drum on the right contains D001 hazardous waste isopropanol.



Photo 5: Bin of used solvent contaminated wipes observed at the Compositz SAA.



Photo 6: Eight 55-gallon drums located in the far corner immediately to the left inside the entrance to the caged CAA. The drum on the left contains D001 hazardous waste flammable liquids (naphtha, propyl acetate), and the remaining seven drums contain nonhazardous waste.



Photo 7: Six 55-gallon drums on portable secondary containment pallets in the near corner immediately to the left inside the entrance to the caged CAA.



Photo 8: One 55-gallon drum of hazardous waste isopropanol in the SAA located outside of the caged CAA. The bung had been removed from the drum, leaving the container open.



Photo 9: One open box of 8-ft universal waste fluorescent lamps, one open box of 4-ft universal waste lamps, and one closed box of 4-ft universal waste lamps in the area just outside of the caged CAA.



Photo 10: One 5-gallon bucket of broken fluorescent lamps and one 5-gallon bucket of universal waste batteries in the area just outside of the caged CAA.



Photo 11: Two 55-gallon drums, four empty blue containers and two empty white containers at the Molded Area Primer Station SAA. The drum on the left contains hazardous waste isopropanol.



Photo 12: Unlatched funnel on the drum of hazardous waste isopropanol in the Molded Area Primer Station SAA.



Photo 13: One 55-gallon drum of D001 hazardous waste aerosols in the SmartFoam Part A & B SAA. The lid did not make complete contact between the lid and the rim of the drum.



Photo 14: One 55-gallon drum of D001 / D007 hazardous waste flammable liquids in one of two SAAs inside the Teflon Room. The drum is labeled hazardous waste and identified as a flammable liquid, but it is not marked with an indication that the contents are toxic.



Photo 15: One 55-gallon drum of D007 hazardous waste solids in one of two SAAs inside the Teflon Room. The drum is labeled hazardous waste and identified with a DOT class 9 hazard placard, but it is not marked with an indication that the contents are toxic.