

RCRA Inspection Report

1) Inspector and Author of Report

Laurie Benton DiGaetano, Environmental Engineer
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency (EPA), Region 4
61 Forsyth Street, S.W. Phone: 404-562-8948
Atlanta, Georgia 30303 Email: benton-digaetano.laurie@epa.gov

2) Facility Information

Core Molding Technologies, Inc. EPA ID# SCR000005629
24 Commerce Drive
Meadowcreek Industrial Park
Gaffney, South Carolina 29340

3) Responsible Officials

Ms. Dawn Belue, Human Resource Manager

4) Inspection Participants

Dawn Belue, Core Molding Technologies, Inc. Alaina Holst, SCDHEC
Laurie Benton DiGaetano, USEPA Robin Duffy, SCDHEC

5) Date of Inspection

September 17, 2020

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 (SCHWMR) R.61-79, 260 through 270, 273, 278, & 279; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

7) Purpose of Inspection

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

8) Facility Description

Core Molding Technologies, Inc. (Core) manufactures sheet molding compound (SMC) and molds this material into fiberglass reinforced plastic parts that are used primarily in the

automotive / trucking and personal watercraft industries. The company operates seven manufacturing plants in North America, and its corporate headquarters are located in Columbus, Ohio. The subject facility in Gaffney, South Carolina, consists of an 111,000 square foot manufacturing building constructed in 1998. The facility was temporarily offline due to the COVID-19 pandemic, but operations recently resumed at this location. Core operates the subject facility under the NAICS Code 326199 for All Other Plastics Product Manufacturing. At the time of the inspection, the facility was typically operating from 6 am – 1:30 am, Monday-Thursday with occasional operations on Fridays and Saturdays. Core has approximately 94 employees at this location.

Core operates ten Thermoset SMC compression molding processes of various pressure capacities at the subject facility. The Thermoset SMC process uses a premade SMC mixture of chopped reinforcements, resins, and fillers that is manufactured at another Core facility in Columbus, Ohio. Core manufactures several types of SMC, and the exact type used for a specific product depends on the mold and customer specifications. At the subject facility, each press can be fitted with an upper movable mold half and a lower fixed mold half to form the desired shape of the final product. Premade SMC is cut to a specified length, forming a “charge,” and each charge is placed into the mold where it is pressed into the desired shape using pressure and heat. If In-Mold Coating (IMC) is needed to further enhance the surface quality of the part, the mold will lift up a few hundredths of an inch while several ounces of IMC will be injected through portholes in the mold. The mold then recloses, spreading the IMC across the entire surface of the part. The formed part is removed from the unit using an ejector pin found in the fixed lower half of the mold.

The final steps of the manufacturing process may include cutting, sanding, painting, and assembly. Holes and voids may be cut into the molded piece using a drill press or water jet, and rough edges are smoothed using a sanding process. Some molded pieces may be painted in the on-site paint booth, and some molded pieces may be assembled on-site by joining them together with bonding adhesive or mechanical fasteners.

The subject facility has been operating as a large quantity generator (LQG) of hazardous waste for over twenty years. According to the 2019 biennial report, Core generates D001 hazardous waste IMC and diacetone alcohol (DAA) mixture, D001 hazardous waste paint solvent and methyl n-amyl ketone (MAK), D009 hazardous waste broken crushed lamps, D001 hazardous waste MAK / isopropyl alcohol (IPA) / paint spill containment, and D001 hazardous waste IMC & DAA with Paint & MAK coating wastes at this facility.

9) Previous Inspection History

SCDHEC has conducted five RCRA CEIs at the subject facility over the past twenty years and found violations during each of those inspections. SCDHEC conducted the most recent RCRA CEI on April 1, 2015, and alleged violations of RCRA notification, quarterly reporting, container management, and contingency planning requirements. SCDHEC verified that the facility had returned to compliance during a follow-up inspection on June 3, 2015.

10) **Findings**

On September 14, 2020, EPA inspector Laurie Benton DiGaetano and SCDHEC inspectors Robin Duffy and Alaina Holst conducted an opening teleconference with Dawn Belue, Human Resource Manager, and Core's environmental consultant Regina Large. Ms. Belue and Ms. Large gave a brief description of the facility, its history, operations, and waste generation. The participants also discussed necessary personal protective equipment (PPE) and standard operating procedures (SOPs) specific to the COVID-19 pandemic.

On September 17, 2020, Ms. Benton DiGaetano, Ms. Duffy and Ms. Holst arrived at Core's subject facility at approximately 9:30 a.m. Ms. Belue immediately received the inspectors, who introduced themselves, showed their credentials, and explained the purpose of the visit. Ms. Belue led the inspectors on a tour of the Facility operation.

Press Line: The facility tour began in the press line area, where the inspectors observed a row of ten press lines laid out side by side. Ms. Belue explained that the raw materials are placed into the press molds and the formed parts are removed for further processing or assembly. No hazardous waste containers were observed in the press line area.

Maintenance Department: Next, the inspection participants visited the maintenance department, where inspectors observed two parts washer units and one box of fluorescent bulbs. The box was labeled "good bulbs," and no hazardous waste or universal waste containers were found in this area. On September 28, 2020, Ms. Belue sent an email to the inspectors which explained that spent parts washer solution will be shipped off-site as hazardous waste. However, this material is generated infrequently, as the last shipment was made before 2018.

The inspectors also observed a few aerosol cans in use at the maintenance area. One can was labeled QD contact-cleaner and Hill Enviro Safety solvent degreaser. Ms. Belue and employees working in this area stated that used aerosol cans are punctured and then disposed, however, inspection participants were not able to locate a can puncturing device and no used aerosol cans were observed in the trash can. In an email dated September 17, 2020, Ms. Belue states that she is working with Univar to develop a proper management method for the spent aerosol cans.

Assembly Area: One process in the assembly area uses a bonding agent to adhere parts and molded pieces. The bonding agent is applied using a robotic process, which does not routinely generate hazardous waste. If the system shuts down, a small amount of bonding agent is purged from the lines in order to prevent the material from hardening inside the system. Purged material is accumulated in a small bucket where it hardens within 8 minutes. The hardened bonding agent is managed as nonhazardous waste.

Paint Booth Satellite Accumulation Area (SAA): Paint is applied to certain Core molded parts in a paint booth near the assembly area. Core manages a hazardous waste SAA next to the paint booth for accumulating D001 hazardous waste paint solvent and MAK (Photo 1), which is generated during paint gun cleaning activities. The inspectors observed one 55-gallon drum in this SAA. The drum was closed with a latched funnel lid, and it was located on a portable secondary containment pallet. The drum labeled as D001 hazardous waste paint MAK from

cleaning paint guns and the label included the statement “Core materials Corporation Hazardous waste federal law prohibits improper disposal” (Photo 2). The drum was not marked with an indication of the hazards of its contents. The inspectors observed paint bucket liners and other paint contaminated debris in and around the secondary containment pallet.

Pursuant to 25 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 25 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 25 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 25 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 25 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.

On September 17, 2020, Ms. Belue sent an email to the inspectors which included an attached photograph documenting that a flammable liquid hazard placard had been affixed to the 55-gallon drum.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which references 25 S.C. Code Ann. Regs. 61-79.262.251 [40 C.F.R. § 262.251] and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

The inspectors also observed an open bin where used paint booth filters had been accumulated for disposal (Photo 3). Employees stated that the paint booth filters are changed out approximately once each month. On September 17, 2020, Ms. Belue sent an email to the

inspectors which included TCLP test results from samples of the paint booth filters taken on April 17, 2019 and April 23, 2019. The April 17, 2019 sample was analyzed for TCLP volatile organics, and the April 23, 2019 sample was analyzed for TCLP semi-volatile organics and TCLP metals. The analytical results indicated that the used paint booth filters do not exhibit the characteristic of toxicity due to the concentration of volatiles, semi-volatiles or metals. The used filters are sent to Republic Services for disposal in the municipal solid waste landfill.

Central Accumulation Area (CAA): Core manages a hazardous waste CAA in a covered area just outside of, and adjacent to the manufacturing building (Photo 4). This area is equipped with an emergency eye wash station, a fire extinguisher, spill control equipment, and an overpack drum. Ms. Belue stated that employees carry hand-held radios for emergency communication in the CAA.

The inspectors observed one 55-gallon drum labeled D001 hazardous waste IMC / DAA on the bottom shelf along the wall in this area (Photo 5). Employees explained that IMC is used to clean the molds in the press room, and used IMC is flushed from the lines and accumulated in a 5-gallon bucket at the press line. The buckets are immediately brought to this area, and the contents are poured into the 55-gallon drum. The drum was located on a portable secondary containment pallet and it was closed with a latched funnel in the lid. The drum marked with an accumulation start date of September 12, 2020, but it was not marked with an indication of the hazards of its contents. The inspectors observed accumulated liquids and material inside the secondary containment pallets.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(B) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label containers with an indication of the hazards of the contents clearly visible for inspection on each container.

On September 17, 2020, Ms. Belue sent an email to the inspectors which included a photograph documenting that a flammable liquid hazard placard had been affixed to the 55-gallon drum.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which references 25 S.C. Code Ann. Regs. 61-79.262.251 [40 C.F.R. § 262.251] and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

The shelving units also contained several 55-gallon drums of raw materials, one 55-gallon drum labeled non-hazardous waste oily debris to be recycled, and several 55-gallon drums labeled as “empty.” The inspectors also observed approximately fourteen totes of used oil on the floor near the shelving unit (Photo 6). Employees explained that this used oil is generated at the presses and it will be picked up by Nelson Oil. Each tote was labeled as used oil (Photo 7). Finally, the inspectors observed one 55-gallon drum with a funnel in the lid in the corner between shelving units (Photo 8). The drum is used to accumulate used oil, but it was not labeled at the time of the

inspection.

Pursuant to 25 S.C. Code Ann. Regs. 61-107.279.22(c)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Employees spray a mixture of DAA / IMC onto molds in the press room to prevent the SMC from adhering to the mold. A small batch of this mixture is generated in the SMC room and transported to the press room in a 30-gallon drum. The residual DAA / IMC mixture inside the 30-gallon drums is brought back to the CAA where it is scraped from the inside of the container and accumulated as D001 hazardous waste. Scraped, empty 30-gallon drums are identified with an “empty” label and sent off-site for recycling. In the area near the door to the SMC room, the inspectors observed four 30-gallon drums of the DAA / IMC mixture which were staged for scraping and consolidation (Photo 9). One of the drums, which was approximately 1/3 full, did not have a lid (Photo 10). None of the drums were labeled as hazardous waste, marked with an indication of the hazards of the contents, or marked with an accumulation start date.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv)(A) [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Pursuant to 25 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 each container 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.

SMC Room: In the SMC Room, employees mix IMC and DAA together in a 30-gallon drum and transfer the drum to the press room where the mixture is injected into the process mold. In the corner of the room where this mixing takes place, the inspectors observed one 30-gallon drum containing DAA / IMC mixture dated September 15, 2020, one 30-gallon drum holding the mixer, and one 5-gallon bucket liner containing the mixing paddle soaking in liquid material. The floor beneath the immediate area of the mixing process was lined with a large piece of cardboard. The inspectors observed visible spills on the cardboard. In an email dated October 9, 2020, Ms. Regina Large stated that the cardboard is visually monitored and changed out at least once a week or as needed. She stated that the cardboard is used to catch spilled IMC material, which is managed as a non-hazardous waste and disposed of in the landfill. No hazardous waste containers were observed in the SMC room.

Notification: The facility contact listed on the most recent DHEC Form 2701 notification, dated April 26, 2019, was no longer current.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.12(d), a generator is required to file a revised or new Notification form whenever the information previously provided becomes outdated or inaccurate.

Contingency Plan: The actions that facility personnel must take in response to emergency's is described in the Facility's Emergency Action Plan, which was last updated on January 5, 2020. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators, and it identifies the emergency response equipment available at the facility. The list of emergency response equipment includes an alarm system, sprinkler system, and fire extinguishers. The plan includes an emergency evacuation map and a map identifying the location of available emergency response equipment. The plan did not describe arrangements agreed to with local emergency response entities, and it did not include a quick reference guide. Core was not able to provide records to document that any arrangements had been made with any local emergency response entities, or that the most recent contingency plan had been submitted to any local emergency response entities.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which references 25 S.C. Code Ann. Regs. 61-79.262.256(b) [40 C.F.R. § 262.256(b)] and is a condition of the LQG Permit Exemption, a generator is required to maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which references 25 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, or other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which references 25 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 must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e. police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which references 25 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.

Training: The inspectors reviewed facility job descriptions which were provided for the Maintenance Supervisor, Production Manager, Plant Manager, Production / Assembly – Shift Supervisor, Quality System Engineer, Shipping / Receiving Supervisor, Team Leader, and Human Resources Manager. Each description did include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. However, none of the job descriptions specifically address or describe hazardous waste management duties of the position

or included the names of employees filling the position. The annual training plan for all employees is described in Core's Hazard Communication Program written procedure 15.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv)(A) [40 C.F.R. § 262.17(a)(7)(iv)(A)], which is a condition of the LQG Permit Exemption, a generator must maintain the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

The training records provided as part this inspection included a sign-in sheet for HazCom, EAP, EHS Policies, SPCC, SWPP training provided on July 11, 2019; a sign-in sheet for RCRA hazardous waste training provided to two employees on October 18, 2019; and a sign-in sheet for SAA training provided to thirteen employees on May 9, 2018. RCRA Hazardous Waste Generator Training certificates were also provided for seven employees who completed the training in July or August 2020.

Hazardous Waste Manifests: The inspectors reviewed hazardous waste manifest and land disposal restriction (LDR) records provided for shipments of hazardous waste sent in 2017, 2018, 2019 and 2020. The records indicate that Core typically sends one shipment of hazardous waste to Giant Resource Recovery – Sumter (SCD036275626) each month. These shipments include one or more of the following waste streams: D001 waste flammable liquids (methyl amyl ketone), D001 waste paint, D001 waste flammable liquids (methyl n-amyl ketone, isopropyl alcohol), D001 waste flammable liquids (diacetone alcohol), and D001 waste flammable liquids (diacetone alcohol, methyl amyl ketone). The records also indicate that Core typically sends one shipment of D009 hazardous waste solid (mercury) to EQ Detroit – Frederick (MID980991566) or EQ Florida (FLD981932494) about once every three to four months, and sent one shipment of D001 / D035 / F003 / F005 waste solids containing flammable liquid (isopropyl alcohol, methanol) to Tradebe Millington (TND000772186) on March 27, 2018.

Used oil is picked up by Nelson Oil Company approximately once every one-to-six months. The most recent pick-up was in August 2020.

Weekly Inspections: The inspectors reviewed Core's available records of inspections of the hazardous waste central accumulation area (CAA) since September 6, 2017. According to the inspection log, hazardous wastes stored in containers at the CAA may include: IMC and DAA, IMC (uncatalyzed) and oil dry, paint and MAK, paint mixed with pligrip 9100, IMC/DAA spill cleanup, broken/crushed lamps, IMC unusable product (uncatalyzed), IMC flammable solid, MAK/IPA/Paint spill containment, and paint gun cleaning. The inspection log includes a checklist to record observations about aisle space, visible container labels, legible container labels, complete container labels, closed lids and bungs, material on outside of container, rings tight, rings turned down, condition of containers, containers compatible with waste, container grounding, control of ignition sources, container stacking, container storage time, contents of containment units, housekeeping, emergency communication, fire extinguisher, spill response kit, and salvage drums. No inspection records were provided for the weeks of July 22, 2019, August 5, 2019, December 30, 2019, January 6, 2020, January 13, 2020 and January 20, 2020, or for the weeks between August 11, 2020 and September 17, 2020.

Pursuant to 25 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 containers and for deterioration of containers caused by corrosion or other factors.

11) Out-Briefing

The inspectors conducted the exit meeting with Ms. Belue. During this meeting, the inspectors stated their preliminary conclusions of the physical inspection, and Ms. Belue provided EPA and SCDHEC each with a flash drive containing records that were requested in an email from Ms. Duffy to Ms. Belue dated September 1, 2020.

12) Conclusion

Based on the observations made during the inspection, Core Molding Technologies was apparently deficient with the following requirements:

- **25 S.C. Code Ann. Regs. 61-79.262.12(d), which requires a generator to file a revised or new Notification form whenever the information previously provided becomes outdated or inaccurate.**
- **25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], a condition of the SAA Permit Exemption, which requires a generator to mark or label its containers with an indication of the hazards of the contents.**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv)(A) [40 C.F.R. § 262.17(a)(1)(iv)(A)], a condition of the LQG Permit Exemption, which requires a container holding hazardous waste to always be closed during accumulation, except when it is necessary to add or remove waste.**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v) [40 C.F.R. § 262.17(a)(1)(v)], a condition of the LQG Permit Exemption, which requires a generator to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [40 C.F.R. § 262.17(a)(5)(i)], a condition of the LQG Permit Exemption, which requires a generator to mark or label each container 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.**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], a condition of the LQG Permit Exemption, which references 25 S.C. Code Ann. Regs. 61-79.262.251 [40 C.F.R. § 262.251] and requires a generator to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air,**

soil, or surface water which could threaten human health or the environment.

- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], a condition of the LQG Permit Exemption, which references 25 S.C. Code Ann. Regs. 61-79.262.256(b) [40 C.F.R. § 262.256(b)] and requires a generator to maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency.**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], a condition of the LQG Permit Exemption, which references 25 S.C. Code Ann. Regs. 61-79.262.261(c) [40 C.F.R. § 262.261(c)] and requires that the contingency plan describes arrangements agreed to with the local police department, fire department, or other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee.**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], a condition of the LQG Permit Exemption, which references 25 S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)] and requires a generator to submit a copy of the contingency plan and all revisions to all local emergency responders (i.e. police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services).**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], a condition of the LQG Permit Exemption, which references 25 S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)] and requires a generator that is amending its contingency plan to at that time submit a quick reference guide of the contingency plan to the local emergency responders.**
- **25 S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv)(A) [40 C.F.R. § 262.17(a)(7)(iv)(A)], a condition of the LQG Permit Exemption, which requires a generator to maintain the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.**
- **25 S.C. Code Ann. Regs. 61-107.279.22(c)(1) [40 C.F.R. § 279.22(c)(1)], which requires containers and aboveground tanks used to store used oil at generator facilities to be labeled or marked clearly with the words “Used Oil.”**

13) **Signed**

Signature

Laurie Benton DiGaetano

Senior Enforcement and Compliance Specialist

Date

Concurrence

Signature

Alan A. Annicella

Chief

Land, Asbestos and Lead Section

Chemical Safety and Land Enforcement Branch

Enforcement and Compliance Assurance Division

Date



Photo 1: One 55-gallon drum located in the SAA next to the paint booth for accumulating D001 hazardous waste paint solvent and MAK. This drum was not marked with an indication of the hazards of its contents.

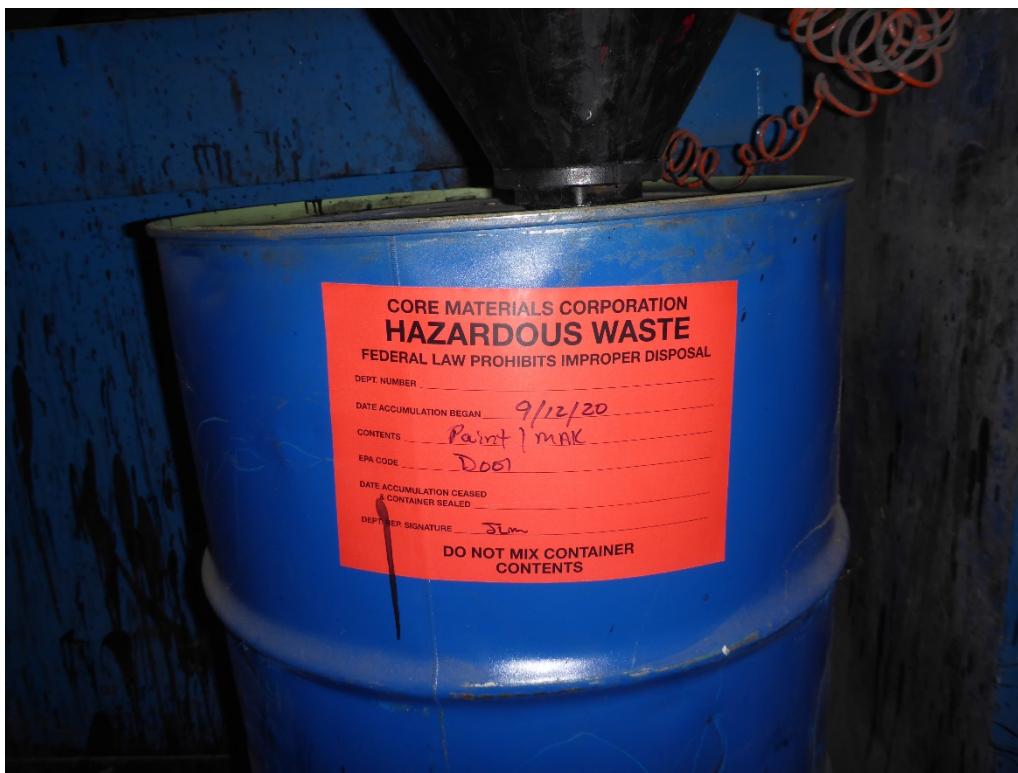


Photo 2: Label on 55-gallon drum accumulating D001 hazardous waste paint solvent and MAK in the SAA next to the paint booth.



Photo 3: Open bin accumulating used paint booth filters.



Photo 4: Part of the CAA located in the covered area just outside of and adjacent to the manufacturing building.



Photo 5: 55-gallon hazardous waste storage drum accumulating and storing hazardous waste IMC / DAA generated at the press lines. Drum observed in the CAA located in the covered area just outside of and adjacent to the manufacturing building. Drum was not marked with an indication of the hazards of its contents.



Photo 6: Some of approximately fourteen totes of used oil on the floor near the shelving unit in the CAA.



Photo 7: Opposite side of totes shown in Photo 6. Each tote labeled as “used oil.”



Photo 8: 55-gallon drum to accumulate used oil. Drum equipped with a latched funnel in the lid, but it was not labeled as “used oil.”



Photo 9: Four 30-gallon drums of hazardous waste DAA / IMC mixture staged for scraping and consolidation. One drum had no lid. None of the drums were labeled or marked with an indication of the hazards of the contents.



Photo 10: One of four 30-gallon drums of hazardous waste DAA / IMC mixture staged for scraping and consolidation. Drum has no lid and is approximately 1/3 full. Drum was not labeled or marked with an indication of the hazards of the contents.