

RCRA Inspection Report

1) Inspector and Author of Report

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

2) Facility Information

Adornus Manufacturing USA, LLC EPA ID# SCD000648493
1551 Highway 9 Bypass West
Lancaster, South Carolina 29720

3) Responsible Officials

Mr. Jamie Lucas, Safety Coordinator

4) Inspection Participants

Jamie Lucas, Adornus	Gerald Shealy, SCDHEC
Candace Parker, Adornus	Alex Latta, SCDHEC
Laura Haynes, Adornus	Laurie Benton DiGaetano, USEPA
Jonathan Casey, Adornus	

5) Date of Inspection

February 26, 2021

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 Adornus Manufacturing USA, LLC's compliance with the applicable requirements of RCRA and the corresponding SCDHEC regulations. This was an EPA lead inspection.

8) Previous Inspection History

During the summer of 2019, Adornus Manufacturing USA, LLC (Adornus) purchased the

subject facility, which had previously served as an AA battery manufacturing facility owned and operated by Duracell Manufacturing, Inc. This is the first RCRA CEI at the subject facility since Adornus began operations here in February 2020.

9) **Facility Description**

Adornus has been in the business of manufacturing and distributing frameless kitchen cabinets and bathroom vanities for about ten years. Adornus took over the subject facility in Lancaster, South Carolina during the summer of 2019 and started production activities at this location in February 2020. This facility serves as the company's corporate headquarters for North America and its only manufacturing facility in the United States. The company also operates two North American distribution centers in Florida and New Jersey. The subject facility operates under the NAICS Code 337110 for Wood Kitchen Cabinet and Countertop Manufacturing. Operations run from Monday through Friday using one shift, and the facility has approximately 115 employees. Operations at the subject facility include planing, cutting, shaping, machining and sanding of wood pieces to create the cabinet boxes, drawers and doors, UV painting of cabinet boxes, and solvent painting of cabinet doors and drawers.

Sheets of plywood used to create the cabinet boxes are painted with a UV paint coating that dries when it is exposed to UV light. The paints are prepared in 5-gallon buckets at the Paint Mix Room. Paint catalyst and hardeners are added to 5-gallon buckets of paint. When a smaller volume of paint is needed, that volume is poured into a used 5-gallon bucket equipped with a plastic liner. Once catalyst and hardeners have been added to the paint, it must be used within a specified timeframe. Buckets of prepared UV paints are brought to the UV lines for use in the painting process where the UV paint mixture is applied to sheets of plywood using a roller-type system. Excess paint runs off the sides of the plywood and is accumulated in a 5-gallon bucket for reuse in the process. Waste UV paint is generated when the paint color in the roller system is changed or when the prepared UV paint mixture has exceeded its lifespan. Waste UV paint is accumulated as non-hazardous UV water-based paint. Personnel estimated that a total of three 55-gallon drums of this waste has been shipped off-site since Adornus began operations at this location.

After the UV paint is applied to the plywood, it is exposed to UV light, which is necessary to dry the paint. Painted sheets of plywood are then sent to the CNC machine where they are precisely cut in order to maximize the efficiency of creating usable pieces out of each sheet. These pieces may also be drilled, routed and edged, as necessary, to create pieces for the final product. Lamps used in the UV light process contain mercury and gallium, and the spent lamps are accumulated and managed as universal waste lamps.

Conveyor belts used to transport plywood through the UV paint coating line system are cleaned using a solvent-based Cefla Belt Cleaner. This cleaner is fed through the system once to clean the belts. The used solvent then exits the system and is accumulated in a 55-gallon drum before it is reclaimed for reuse on-site. The 55-gallon drum of spent solvent is brought from the UV paint coating line system to the reclaim room, where the contents of the drum are manually transferred from the drum into a small solvent still using a 5-gallon bucket as a ladle. Reclaimed solvent drains from the still into a 5-gallon bucket, which is then poured into a 55-gallon drum for reuse

cleaning belts in the UV paint coating line system. After running three or four cycles of the solvent reclaim still, D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) sludge is manually removed using a 5-gallon bucket to transfer the sludge from the still into a 55-gallon drum.

Cabinet doors are produced in the Door Room. Rough cut 1x6 inch and 1x8 inch boards of timber between twelve and sixteen feet long are planed, cut, and ripped into strips in the Rough Mill portion of the facility. The resulting pieces are sent to the Door Room where they are shaped, machined and sanded to create doors and drawer faces. The door and drawers are then primed and painted onsite with solvent paints using a spray-on painting system.

At the time of the inspection, Adornus was operating two solvent-based paint spray lines, and each line had a Satellite Accumulation Area (SAA) for accumulating D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) excess paint and overspray generated in the system. The excess paint and overspray drains from the spray-on painting line into a waiting, open 5-gallon bucket. Employees stage a second bucket next to the first, so that they can alternate the two buckets beneath the waste outfall. Each bucket is equipped with a plastic liner. When one bucket becomes approximately ½ full, it is carried to a 55-gallon drum and its contents are poured from the bucket and liner into the drum. Meanwhile, the second lined 5-gallon bucket is placed beneath the excess paint outfall to accumulate waste paint as it is generated in the painting process unit. According to facility personnel, the buckets are alternated about once every hour throughout the production day.

At the end of the day, the waste paint buckets and liners are transferred to the solvent reclaim room. The buckets and/or liners are staged in this room for approximately three days or until the waste that remains in the liner is dry. Buckets and liners containing dried solvent paint waste are disposed of in the regular trash.

Adornus personnel use solvents and rags to clean equipment throughout the facility. Rags are accumulated in 5-gallon flip-top flammable cans and in 55-gallon drums, which are staged in select areas throughout the facility. Facility personnel explained that the used rags are wrung out by hand to remove liquids, and they are shipped offsite as excluded solvent-contaminated disposable wipes.

Adornus manages one hazardous waste Central Accumulation Area (CAA), which is located in a designated outbuilding. The outbuilding also houses boxes of universal waste lamps, full containers of excluded solvent-contaminated disposable wipes.

Adornus has been operating as a large quantity generator (LQG) of hazardous waste at this location for approximately one year. Adornus Manufacturing USA, LLC first notified as an LQG of hazardous waste on 04/14/2020. Hazardous waste manifest records indicate that the facility generates D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone). No biennial or quarterly reports have been submitted since Adornus became the new owner and operator at this location.

10) **Opening Conference**

On 02/26/2021, EPA inspector Laurie Benton DiGaetano, accompanied by SCDHEC inspectors Gerald Shealy and Alex Latta, arrived at the subject Adornus Manufacturing USA, LLC facility at approximately 9:35 a.m. Mr. Jamie Lucas, Safety Coordinator, immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Mr. Lucas, and explained the purpose of the visit. Mr. Lucas and the inspectors were joined by Ms. Laura Haynes, Human Resources Manager during the opening conference. Mr. Lucas provided an overview of the facility's history and current operations.

The Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using a business' SIC/NAICS code and annual receipts or number of employees. Mr. Lucas and Ms. Haynes estimated that the facility has approximately 115 employees at this location, but the inspector did not find an estimate of the total number of employees for Adornus Manufacturing USA, LLC. Please note that companies operating under the business class associated with the NAICS Code 337110 for Wood Kitchen Cabinet and Countertop Manufacturing that have less than 750 employees may still qualify as a small business for Federal Government programs. Although the EPA inspector did not provide a copy of the agency's information sheet for small businesses, this information sheet can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The inspectors described the anticipated use of a 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 EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Lucas led the inspectors on a tour of the facility operations.

11) **Findings**

Paint Mixing Room Area: The facility tour began just outside of the paint mixing room, where the inspectors observed five 55-gallon drums sitting on portable secondary containment pallets along the wall (Photos 1 and 2). The first drum was identified as nonhazardous UV water based paint, the second was identified as hazardous waste flammable solvents, the third was identified as excluded solvent contaminated disposable wipes, the fourth was identified as denatured alcohol product, and the fifth was identified as acetone product. Although the sign on the wall behind the second 55-gallon drum indicated that this drum contained hazardous waste flammable solvents, no hazardous waste label was visible on the drum. The drum was equipped with a funnel, which was open when the inspectors arrived in this area. The inspectors also observed a flammable liquid DOT hazard placard on the drum. The drum of excluded solvent contaminated disposable wipes was labeled as nonhazardous waste excluded solvent contaminated wipes. This drum was completely open and was not equipped with a lid.

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)(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.

Pursuant to 25 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 R. 61-79.261.4(b)(18) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in R.61-79.261.4(b)(18) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to R.61-79.261.4(b)(18)(i) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(b)(18)(i)], which is a condition of the Solvent-Contaminated Disposable Wipes Exclusion, solvent-contaminated wipes, when accumulated, stored, and transported, must be contained in non-leaking closed containers. 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.

Solvent Reclaim Room: Ms. Candace Parker joined the facility tour in the Solvent Reclaim Room and remained with the inspection participants for the remainder of the facility tour. Following the facility tour, Mr. Jonathan Casey described the operations and procedures performed in this room and identified the contents of many unlabeled containers. Mr. Casey

explained that this room is used to manage solvent-based paints and waste, and UV waste should not be brought to this area. However, the inspection participants observed one blue 55-gallon drum with an open-top funnel in the open container bung (Photo 3). Mr. Casey explained that this drum is kept in this area as a courtesy to accumulate the contents of any 5-gallon buckets of UV paint waste that are brought here by mistake. The drum was still labeled as acetone product and identified with a flammable liquid DOT hazard placard.

The inspection participants observed a small solvent distillation unit inside the Reclaim Room (Photo 4). Mr. Casey explained that the conveyor belts used in the UV paint coating line system are cleaned using a solvent-based Cefla Belt Cleaner. The cleaner is fed through the system once to clean the belts before it is accumulated in a 55-gallon drum for reclamation and reuse on-site. The spent Cefla Belt Cleaner solvent is reclaimed using the small solvent distillation unit observed in this area. Mr. Casey explained that the three 55-gallon drums observed next to the solvent distillation unit (Photo 5) contain spent Cefla Belt Cleaner solvent that will be reclaimed in the distillation unit. None of these drums were labeled, and one was open without a ring to secure the lid to the drum. The inspectors observed a milky liquid with a solvent odor inside the open drum.

Pursuant to R.61-79.261.6(b) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.6(b)], generators and transporters of recyclable materials are subject to the applicable requirements of parts 262 and 263 of this chapter and the notification requirements under section 3010 of RCRA, except as provided in paragraph (a) of this section.

Pursuant to 25 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 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)(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 containers (A) with the words “Hazardous Waste”; (B) with an indication of the hazards of the contents; and (C) with the date upon which each period of accumulation begins clearly visible for inspection on each container.

The small solvent distillation unit reclaims spent Cefla Belt Cleaner using a batch process. Mr. Casey explained that the contents of the spent solvent drums will be transferred from each drum into the distillation unit using a 5-gallon bucket as a ladle. Reclaimed solvent drains from the

unit through an outfall hose and into a 5-gallon bucket. The inspectors observed one open, unlabeled, empty bucket staged under the outfall hose. Mr. Casey stated that three or four batches of solvent reclamation can be run in the unit before personnel must remove the solvent sludge generated by this process. The sludge is manually removed from the distillation unit using a 5-gallon bucket to transfer the waste from the unit into a 55-gallon drum. The inspectors observed one 55-gallon drum containing spent solvent sludge near the solvent distillation unit (Photo 6). The drum was equipped with a latched elevated lid. The drum was not labeled, and it was not marked with an accumulation start date. The drum was not marked with the words “hazardous waste” or with an indication of the hazards of its contents. Solvent sludge generated in the still is shipped off-site as D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone).

Pursuant to 25 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.

The inspectors observed three 5-gallon buckets staged next to the distillation unit (Photo 7). It appears that these buckets may be used to transfer spent solvents into the distillation unit and/or transfer solvent sludge out of the unit. The buckets were completely open, and none of them were labeled.

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 containers (A) with the words “Hazardous Waste”; (B) with an indication of the hazards of the contents; and (C) with the date upon which each period of accumulation begins clearly visible for inspection on each container.

The inspection participants observed three 55-gallon drums in the Reclaim Room near the wall opposite the solvent distillation unit (Photo 8). Mr. Casey explained that these drums contain recycled Cefla Belt Cleaner, which will be used again in the UV paint line. Two of the drums were labeled with the original Cefla Belt Cleaner label, which included a flammable liquid DOT hazard placard. The original label on the third drum had been spray painted over, leaving the drum with a flammable liquid DOT hazard placard but without a label (Photo 9). This drum was equipped with an open-top yellow funnel in the open container bung.

The inspection participants observed several 5-gallon buckets and bucket liners containing varying amounts of waste paint in the Reclaim Room (Photos 10, 11 and 12). Personnel explained that these buckets are staged in this area to dry before the contents are disposed of as solid waste. Personnel estimated that buckets used at the first and second solvent paint spray lines to accumulate solvent paint waste are brought here at the end of the day and staged in this

area to dry. Although Mr. Casey stated that this room is only used to manage solvent paint waste, other facility personnel stated that buckets and bucket liners of UV paint waste are also brought to this area to dry. It appeared that some 5-gallon buckets and bucket liners observed in this area contained UV paint waste and others contained spent solvents or solvent paint waste.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must accurately determine if that waste is a hazardous waste following the methods articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].

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 containers (A) with the words “Hazardous Waste”; (B) with an indication of the hazards of the contents; and (C) with the date upon which each period of accumulation begins clearly visible for inspection on each container.

First Solvent Paint Spray Line: Adornus manages a SAA at the first solvent paint spray line for managing D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) that is generated as excess paint and overspray in this line. The facility maintains a fire extinguisher and a spill kit near this area. The inspectors observed two 5-gallon buckets and three 55-gallon drums in this SAA. The buckets were staged next to the excess paint outfall (Photo 13), two drums were located at the end of the process line (Photo 14), and one drum was located on a portable secondary containment unit next to the wall (Photo 15). The buckets were completely open and not labeled with the words “hazardous waste” or an indication of the hazards of the contents. The two drums at the end of the process line were both closed, labeled D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone), and identified with a flammable liquid DOT hazard placard. One drum was dated 02/24/2021 and the other was dated 02/25/2021. The product labels for the raw materials originally contained in these drums were still visible, and the flammable liquid hazard placard on the drum dated 02/25/2021 was the placard found on this raw material label. The third drum was equipped with an open-top funnel in the open bung. It was labeled as hazardous waste and identified with a flammable liquid DOT hazard placard.

Pursuant to 25 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.

Pursuant to 25 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.

Please note that 25 S.C. Code Ann. Regs. 61-79.262.15(a)(6)(i) and (ii) [40 C.F.R. § 262.15(a)(6)(i) and (ii)] requires that a generator who accumulates an excess of 55-gallons of hazardous waste at or near any point of generation must comply within three consecutive calendar days with the applicable central accumulation area (CAA) regulations or remove the excess from the SAA within three consecutive calendar days to either a CAA, a on-site interim status or permitted treatment, storage, or disposal facility, or an off-site designated facility. Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(6)(iii) [40 C.F.R. § 262.15(a)(6)(iii)], the generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating and continue to comply with the requirements of the SAA Permit Exemption during the three-consecutive-calendar-day period.

The total volume of waste in the two 5-gallon buckets and the 55-gallon drum next to the wall appeared to be less than 55 gallons. However, the volume of waste contained in the two full 55-gallon drums located at the end of the process line caused this SAA to exceed the 55-gallon limit. The drums of excess waste observed in this SAA were dated 02/24/2021 and 02/25/2021, so it appears that, at the time of the inspection, fewer than three consecutive calendar days had passed since the excess waste had begun accumulating.

The inspectors observed one 5-gallon flip-top flammable can next to the first solvent paint spray line (Photo 16). The can is used to accumulate excluded solvent contaminated disposable wipes, but it was labeled “oily waste, empty every night.” The can was not labeled as excluded solvent contaminated wipes.

Pursuant to R.61-79.261.4(b)(18)(i) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(b)(18)(i)], which is a condition of the Solvent-Contaminated Disposable 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 inspectors observed one 55-gallon drum next to a support beam near the first solvent paint spray line (Photo 17). This drum is used to accumulate excluded solvent contaminated disposable wipes. The drum was closed, and it was labeled as nonhazardous waste excluded solvent contaminated rags.

Second Solvent Paint Spray Line: Adornus manages a SAA at the second solvent paint spray line for managing D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) that is generated as excess paint and overspray in this line. The facility maintains a fire extinguisher near this area. The inspectors observed a fire extinguisher, two 5-gallon buckets (Photo 18) and one 55-gallon drum (Photo 19) in this SAA. The buckets were staged next to the excess paint outfall, and the drum was located on a portable secondary containment unit next to the wall. The buckets were completely open and not labeled with the words “hazardous waste” or an indication of the hazards of the contents. The drum was equipped with a latched funnel lid. It was labeled as

hazardous waste and identified with a flammable liquid DOT hazard placard.

Pursuant to 25 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.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], 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.

The inspectors observed one 5-gallon flip-top flammable can next to the second solvent paint spray line (Photo 20). The can is used to accumulate excluded solvent contaminated disposable wipes, but it was labeled “oily waste, empty every night.” The can was not labeled as excluded solvent contaminated wipes.

Pursuant to R.61-79.261.4(b)(18)(i) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(b)(18)(i)], which is a condition of the Solvent-Contaminated Disposable 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 inspectors observed one 55-gallon drum next to a support beam near the second solvent paint spray line. This drum is used to accumulate excluded solvent contaminated disposable wipes. The drum was closed, and it was labeled as nonhazardous waste excluded solvent contaminated rags.

Paint/Stain Mixing Station: Mr. Lucas stated that the only hazardous waste generated in the paint / stain mixing station is used solvents that may be generated during cleaning activities. The spent solvent is accumulated in the first solvent paint spray line SAA.

The inspectors observed one 5-gallon flip-top flammable can next to the paint / stain mixing station (Photo 21). The can is used to accumulate excluded solvent contaminated disposable wipes, but it was labeled “oily waste, empty every night.” The can was not labeled as excluded solvent contaminated wipes.

Pursuant to R.61-79.261.4(b)(18)(i) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(b)(18)(i)], which is a condition of the Solvent-Contaminated Disposable 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.”

Hazardous Waste Central Accumulation Area (CAA): The waste outbuilding includes a designated hazardous waste CAA and a designated universal waste storage area. The CAA was identified with a sign which read “hazardous waste storage area.” Adornus manages ignitable waste in this CAA, and the inspectors observed “No Smoking” signs next to the hazardous waste storage area sign. Mr. Lucas stated that personnel carry cell phones when working in this area, but the building is not equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel. The building is equipped with a fire alarm capable of summoning emergency assistance from local fire departments and alerting them to this specific zone within the facility. The building is equipped with portable fire extinguishers and an emergency shower and eyewash station. The spill kit was located at the loading dock outside of the CAA, and Mr. Lucas brought the kit into the caged CAA. The spill kit contained only one small bag of absorbent material.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 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, all areas of an LQG where hazardous waste is generated or accumulated onsite must be equipped with (a) an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel and (c) portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment.

The inspectors observed six wooden pallets holding twenty 55-gallon drums of hazardous waste along the wall inside the CAA (Photo 22). The drums were all closed, labeled D001 / F003 / F005 hazardous waste flammable liquid, and identified with a flammable liquid DOT hazard placard. However, the DOT hazard placard on two drums was obscured with black spray paint (Photo 23 and 24). No accumulation start date was observed on three drums, and the oldest date observed on the remaining drums was 02/05/2021.

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

The inspectors observed two 55-gallon drums of excluded solvent contaminated disposable wipes on a wooden pallet next to the wall opposite the hazardous waste containers (Photo 25). The drums were both closed and labeled nonhazardous waste excluded solvent contaminated rags.

The inspection participants observed one 55-gallon drum on a portable secondary containment unit on the loading dock outside of the hazardous waste CAA (Photo 26). The drum was labeled D001 / F003 / F005 hazardous waste flammable liquid (acetone / toluene), dated 10/07/2020, and identified with a flammable liquid DOT hazard placard. The portable secondary containment unit was full of liquid. Mr. Lucas explained that this drum was staged in this area after an employee hit it with a forklift, causing it to leak (Photo 27). The contents of the container had not been

transferred to a container that is in good condition; the container had not been placed into an overpack drum; and the waste had been stored onsite for 142 days.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(1)(ii) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(b) [40 C.F.R. § 262.17(b)], which is a condition of the LQG Permit Exemption, a generator who accumulates hazardous waste for more than 90 days is subject to the requirements of 25 S.C. Code Ann. Regs. 61-79.124, 264 through 268 and 270 [40 C.F.R. § 124, 264 through 268, and 270], and the notification requirements of Section 44-56-120 of the SCHWMA, S.C. Code Ann. § 44-56-120 [Section 3010 of RCRA], unless it has been granted an extension to the 90-day period.

Universal Hazardous Waste Storage Area: The waste outbuilding includes a designated hazardous waste CAA and a designated universal waste storage area. According to the records provided during the inspection, the facility has not sent a shipment of universal waste offsite since they began operations in February 2020.

The inspectors observed one box of 8-foot used fluorescent lamps, six boxes of 4-foot used fluorescent lamps, one box of 2.5-foot used fluorescent lamps, and one box of metal halide lamps in this area during the inspection (Photo 28). The 8-foot box and two 4-foot boxes were lamp recycling kits, which were closed and labeled universal waste lamps. The remaining containers were cardboard boxes, which were not labeled as universal waste. Two of the 4-foot boxes were open (Photo 29 and 30), and none of the boxes were marked with an accumulation start date.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.9 [40 C.F.R. § 273.9], a Small Quantity Handler of Universal Waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant to 25 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.

Pursuant to 25 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 25 S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Contingency Plan: The inspector reviewed the facility’s Contingency Plan, which was dated 01/06/2020. The plan does not describe specific actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. Some examples of these emergency procedures are described in 25 S.C. Code Ann. Regs. 61-79.262.265 [40 C.F.R. § 262.265]. The plan does not describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or the Local Emergency Planning Committee. The plan does list the names and emergency telephone numbers for persons identified as emergency coordinators. Jamie Lucas is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates. The plan does not include a list of all emergency equipment, such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment, found at the facility. Note that the plan should also include the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan does not include an evacuation plan for personnel. This plan identifies, but does not describe, signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.261(a), (c), (e) and (f) [40 C.F.R. § 262.261(a), (c), (e) and (f)], and is a condition of the LQG Permit Exemption, the contingency plan must describe the actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility; the 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; the plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required; the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities; the plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary; and the plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Ms. Haynes stated that a copy of the Contingency Plan was handed to the Fire Marshall during a routine visit to the facility, but the facility had not submitted the plan the police department, hospital, State and local emergency response teams and the Local Emergency Planning Committee. The plan did not include a Quick Reference Guide.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.256(a) [40 C.F.R. § 262.256(a)], and is a condition of the LQG Permit Exemption, a LQG must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 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 LQG must maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.

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

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 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, an LQG that first becomes subject to these provisions after May 30, 2017 must submit a quick reference guide of the contingency plan to the local emergency responders.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)], the quick reference guide should 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; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records: The inspectors reviewed facility job descriptions that were provided for the Paint Mixer / Handler, Safety Coordinator, Production Supervisor, and Team Lead, but the provided records did not include the names of employees filling each of these positions. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. However, none of the job descriptions included a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of hazardous waste training for sixteen employees completed on 05/21/2020. With one exception, all employees noted to have signed hazardous waste manifests or inspection records for the CAA received the RCRA training provided by Environmental Options on 05/21/2020. One employee noted to have signed inspection records for the CAA was not included on the sign-in sheet for this training event.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(7)(i)(A) [40 C.F.R. § 262.17(a)(7)(i)(A)], 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.

Pursuant to 25 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: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position at the facility related to hazardous waste management; 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 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 operations began in February 2020. Hazardous waste manifest records show that shipments of between approximately 1,700 and 4,000 gallons of D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene) were sent to GRR Sumter (SCD036275626) in May and August 2020, and in February 2021, and to Giant Cement (ALD070513767) in November 2020. The most recent shipment was sent to GRR Sumter (SCD036275626) on 02/08/2021.

No quarterly reports have been submitted to SCDHEC.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.41(a) and (b) [40 C.F.R. § 262.41(a) and (b)], each LQG who ships any hazardous waste offsite to a treatment, storage or disposal facility within the United States must (a) prepare and, no later than thirty days after the end of each calendar quarter, submit a written report to the Department including, but not limited to the following information unless otherwise indicated: The EPA identification number, name and address of the generator; the

calendar quarter covered by the report; 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; 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; 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. The types and quantities of such wastes shipped offsite for treatment and disposal; the types and quantities of such wastes remaining in storage at the end of the reporting period; and certification of information signed by the generator or his authorized representative; and (b) any LQG must submit the information required by paragraph (a) on a form designated by the Department and according to the instructions included with such form.

The manifest records also showed that empty paint pails have been sent to Lee County Solid Waste facility in August 2020 and February 2021 and to Giant Cement in November 2020.

No records were provided for any shipments of universal waste sent offsite since Adornus began operations at this facility in February 2020.

Solvent Contaminated Wipes: Adornus provided records for shipments of solvent-contaminated wipes being sent off-site for disposal. Records show that eight to twelve 55-gallon drums of excluded solvent contaminated wipes were sent to Lee County Solid Waste Facility in May and August 2020 and in February 2021. Fourteen more 55-gallon drums of excluded solvent contaminated wipes were sent to Giant Cement in November 2020. Adornus provided documentation of the name and address of the landfills or combustors that have received the solvent-contaminated wipes. Shipment records indicate that the 180-day time limit in 40 C.F.R. § 261.4(a)(26)(ii) is being met. Adornus did not provide a description of the process being used 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 25 S.C. Code Ann. Regs. 61-79.261.4(b)(18)(v)(C) [40 C.F.R. § 261.4(b)(18)(v)(C)], which is a condition of the Solvent-Contaminated Disposable Wipes Exclusion, generators must maintain documentation describing 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: The inspectors reviewed Adornus' available records of inspections of the hazardous waste central accumulation area (CAA) since operations began in February 2020. The inspection log checklist includes a place to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The checklist also includes a place to record observations about the number of containers present; dented, crushed, or punctured containers; the general condition of the containers; open containers; label marks or markings; and the presence of emergency equipment. Nearly all of the records include the date

and time of the inspection and the name and signature of the employee conducting the inspection.

12) Closing Conference

The inspectors conducted the exit meeting with Mr. Lucas and Ms. Haynes. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) Inspection Findings

It is recommended that Adornus improve general housekeeping at the facility by ensuring that wastes do not spill or drip onto the outside of containers, and that both waste and product containers are accurately labeled to indicate the contents of each container and the potential hazards of those contents. Although solvent contaminated wipes that are managed under the Solvent-Contaminated Disposable Wipe Exclusion are not regulated as hazardous waste, they may still exhibit a hazardous waste characteristic. Therefore, it is recommended that the labels on containers of excluded solvent contaminated wipes not indicate that the contents are non-hazardous.

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

- **Pursuant to R.61-79.261.4(b)(18)(i) of the South Carolina Hazardous Waste Management Regulations [40 C.F.R. § 261.4(b)(18)(i)], which is a condition of the Solvent-Contaminated Disposable Wipes Exclusion, solvent-contaminated wipes, when accumulated, stored, and transported, must be contained in non-leaking closed containers. 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.**
- **Pursuant to 25 S.C. Code Ann. Regs. 61-79.261.4(b)(18)(v)(C) [40 C.F.R. § 261.4(b)(18)(v)(C)], which is a condition of the Solvent-Contaminated Disposable Wipes Exclusion, generators must maintain documentation describing 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.**
- **Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must accurately determine if that waste is a hazardous waste following the methods articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].**
- **Pursuant to 25 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.

- Pursuant to 25 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 25 S.C. Code Ann. Regs. 61-79.262.17(a)(1)(ii) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section.
- 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 containers (A) with the words “Hazardous Waste”; (B) with an indication of the hazards of the contents; and (C) with the date upon which each period of accumulation begins clearly visible for inspection on each container.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 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, all areas of an LQG where hazardous waste is generated or accumulated onsite must be equipped with (a) an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel and (c) portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.256(a) [40 C.F.R. § 262.256(a)], and is a condition of the LQG Permit Exemption, a LQG must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 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 LQG must

maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.

- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.261(a), (c), (e) and (f) [40 C.F.R. § 262.261(a), (c), (e) and (f)], and is a condition of the LQG Permit Exemption, the contingency plan must describe the actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility; the 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; the plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required; the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities; the plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary; and the plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 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 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.**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 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, an LQG that first becomes subject to these provisions after May 30, 2017 must submit a quick reference guide of the contingency plan to the local emergency responders.**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(7)(i)(A) [40 C.F.R. § 262.17(a)(7)(i)(A)], 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.**
- Pursuant to 25 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: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position at the facility related to hazardous waste management; 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 records that document that the training or job experience, required in this section, has been given to, and completed by, facility personnel.

- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(b) [40 C.F.R. § 262.17(b)], which is a condition of the LQG Permit Exemption, a generator who accumulates hazardous waste for more than 90 days is subject to the requirements of 25 S.C. Code Ann. Regs. 61-79.124, 264 through 268 and 270 [40 C.F.R. § 124, 264 through 268, and 270], and the notification requirements of Section 44-56-120 of the SCHWMA, S.C. Code Ann. § 44-56-120 [Section 3010 of RCRA], unless it has been granted an extension to the 90-day period.**
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.41(a) and (b) [40 C.F.R. § 262.41(a) and (b)], each LQG who ships any hazardous waste offsite to a treatment, storage or disposal facility within the United States must (a) prepare and, no later than thirty days after the end of each calendar quarter, submit a written report to the Department including, but not limited to the following information unless otherwise indicated: The EPA identification number, name and address of the generator; the calendar quarter covered by the report; 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; 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; 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. The types and quantities of such wastes shipped offsite for treatment and disposal; the types and quantities of such wastes remaining in storage at the end of the reporting period; and certification of information signed by the generator or his authorized representative; and (b) any LQG must submit the information required by paragraph (a) on a form designated by the Department and according to the instructions included with such form.**
- Pursuant to 25 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.**

- Pursuant to 25 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 25 S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

14) **List of Appendices**

Appendix 1: Photo Log
 30 Photos taken on: February 26, 2021
 Photos taken by: Laurie Benton DiGaetano
 Photos taken with: Panasonic DMC TS-5 Digital Camera
 EPA Property Tag: S09533

15) **Signed**

LAURIE DIGAETANO  Digitally signed by LAURIE DIGAETANO
 Date: 2021.03.18 18:39:13 -04'00'

 Signature
 Laurie Benton DiGaetano
 Senior Enforcement and Compliance Specialist

 Date

Concurrence

ARACELI CHAVEZ  Digitally signed by ARACELI CHAVEZ
 Date: 2021.03.18 10:07:00 -04'00'

 Signature
 Araceli B. Chavez
 Chief
 RCRA Enforcement Section
 Chemical Safety and Land Enforcement Branch

 Date



Photo 1: Three of five 55-gallon drums staged on portable secondary containment pallets in the UV Paint Coating Area along the wall just outside of the Paint Mixing Room. The drum on the left was identified for accumulating nonhazardous UV water based paint; the drum in the middle was identified for accumulating hazardous waste flammable solvents; and the drum on the right was identified for accumulating excluded solvent contaminated disposable wipes.



Photo 2: Four of five 55-gallon drums staged on portable secondary containment pallets in the UV Paint Coating Area along the wall just outside of the Paint Mixing Room. The drum on the left was identified for accumulating hazardous waste flammable solvents; second drum from the left was identified for accumulating excluded solvent contaminated disposable wipes; the second drum from the right was identified as denatured alcohol; and the drum on the right was identified as acetone.



Photo 3: One 55-gallon drum observed near a post in the Reclaim Room. According to facility personnel, this drum, which is equipped with an open funnel, is used to accumulate waste UV paints that are brought into this room. Personnel stated that the standard operating procedure is to pour the contents of waste UV paint buckets into the designated 55-gallon accumulation drum located on portable secondary containment pallet in the UV Paint Coating Area along the wall just outside of the Paint Mixing Room shown in Photo #1. However, personnel working in this room maintain the accumulation drum shown in this photograph as a courtesy when employees mistakenly bring the 5-gallon containers of UV paint waste to this room.



Photo 4: Solvent distillation unit found in the reclaim room. The bucket on the left is used to accumulate recovered solvent for reuse on-site. The three 5-gallon buckets in front of the machine contain an unknown material and may be used to load spent solvents into the machine and/or unload solvent sludge from the machine.



Photo 5: Three unlabeled 55-gallon drums observed near the solvent distillation unit in the Reclaim Room. Two of the drums are closed, but the drum on the right is open with no ring to secure the lid to the container. According to facility personnel, these drums contain spent Cefla Belt Cleaner solvent that is generated in the UV paint line. These solvents are staged here to be reclaimed in the solvent distillation unit, and the reclaimed solvent will be reused in the UV paint line.



Photo 6: One 55-gallon drum observed near the wall near the solvent distillation unit in the Reclaim Room. According to facility personnel, solvent sludge generated in the distillation unit is manually transferred into this drum using a 5-gallon bucket. The drum is fitted with an elevated lid, which was latched closed. The drum was not labeled as “hazardous waste,” it was not marked with an accumulation start date, and it was not marked with an indication of the hazards of its contents.



Photo 7: Three 5-gallon buckets in front of the solvent distillation machine that contain an unknown material and may be used to load spent solvents into the machine and/or unload solvent sludge from the machine.



Photo 8: Three 55-gallon drums observed in the Reclaim Room near the wall opposite the solvent distillation unit. According to facility personnel, two of the drums contain new or recovered Cefla Belt Cleaner solvents, and the third drum, which is equipped with an open funnel, is used to accumulate reclaimed Cefla Belt Cleaner solvent that is generated in the solvent distillation unit in this room.



Photo 9: Another view of the 55-gallon drum observed near the wall opposite the solvent distillation unit in the Reclaim Room. According to facility personnel, this drum, which is equipped with an open funnel, is used to accumulate reclaimed Cefla Belt Cleaner solvent that is generated in the solvent distillation unit in this room.



Photo 10: Several 5-gallon buckets with and without liners in the Reclaim Room. Buckets and liners appear to contain spent solvents, solvent paint waste and/or UV paint waste. The buckets are open and not labeled.



Photo 11: Several of the 5-gallon buckets in the Reclaim Room. Buckets appear to contain spent solvents and/or solvent paint waste. The buckets are open and not labeled.



Photo 12: Several of the 5-gallon buckets with and without liners in the Reclaim Room. Buckets and liners appear to contain UV paint waste. The buckets are open and not labeled.



Photo 13: Two 5-gallon buckets staged at the first solvent paint spray line SAA. These buckets are used to accumulate D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) that is generated as excess paint and overspray in this solvent paint spray line unit. Neither bucket is labeled with the words “hazardous waste.” Neither bucket is closed, but only one has waste being added into the container.



Photo 14: Two 55-gallon drums of hazardous waste observed with other 55-gallon drums at the end of the first solvent paint spray line. The drums were both labeled as D001 / F003 / F005 hazardous waste flammable liquid (acetone / toluene) and identified with a flammable liquid DOT hazard placard. One drum was dated 02/24/2021 and the other was dated 02/25/2021. Both drums also had product labels clearly visible for the original contents of the containers.



Photo 15: One 55-gallon drum located in the first solvent paint spray line SAA. The drum is located on a secondary containment pallet next to the process line. D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) that is generated as excess paint and overspray in the solvent paint spray line is poured from the 5-gallon buckets staged at the spray line into this 55-gallon drum. The drum is equipped with an open funnel. It is labeled as D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) and it is identified with a flammable liquid DOT hazard placard.



Photo 16: One 5-gallon step-open flammable can for accumulating excluded solvent contaminated disposable wipes at the first solvent paint spray line. The container is labeled as “oily waste” and “empty every night.” It is not labeled as excluded solvent contaminated wipes.



Photo 17: One 55-gallon drum of excluded solvent contaminated disposable wipes observed near the end of the first solvent paint spray line. The drum was closed and labeled non-hazardous solvent excluded rags.



Photo 18: Two 5-gallon buckets staged at the second solvent paint spray line SAA. These buckets are used to accumulate D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) that is generated as excess paint and overspray in this solvent paint spray line. Neither bucket is labeled with the words “hazardous waste.” Neither bucket is closed, but only one has waste being added into the container.



Photo 19: One 55-gallon drum located in the second solvent paint spray line SAA. The drum is located on a secondary containment pallet next to the process line. D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) that is generated as excess paint and overspray in the solvent paint spray line is poured from the 5-gallon buckets staged at the spray line into this 55-gallon drum. The drum is closed with a latched funnel in the bung. It is labeled as D001 / F003 / F005 hazardous waste flammable liquid (toluene / acetone) and it is identified with a flammable liquid DOT hazard placard.



Photo 20: One 5-gallon step-open flammable can for accumulating excluded solvent contaminated disposable wipes at the second solvent paint spray line. The container is labeled as “oily waste” and “empty every night.” It is not labeled as excluded solvent contaminated wipes.



Photo 21: One 5-gallon step-open flammable can for accumulating excluded solvent contaminated disposable wipes at the laquer spray line. The container is labeled as "oily waste" and "empty every night." It is not labeled as excluded solvent contaminated wipes.



Photo 22: Twenty 55-gallon drums of hazardous waste observed in the hazardous waste CAA. The drums were staged on six wooden pallets. Hazardous waste labels were observed on seventeen of the drums, indicating that the containers held D001 / F003 / F005 hazardous waste flammable liquids (acetone / toluene). Hazardous waste labels were observed on the remaining three drums, but the labels were obscured by other drums or the wall and could not be read. No accumulation start dates were observed on three drums. The oldest drum with an accumulation start date was dated 02/05/2021. Although all of the drums were identified with a flammable liquid DOT hazard placard, that placard had been partially covered with black spray paint on two of the drums.



Photo 23: Partially covered flammable liquid DOT hazard placard on one drum in the hazardous waste CAA.



Photo 24: Partially covered flammable liquid DOT hazard placard on one drum in the hazardous waste CAA.



Photo 25: Two 55-gallon drums of excluded solvent contaminated disposable wipes observed in the hazardous waste CAA. The drums were both closed and labeled nonhazardous excluded solvent contaminated rags.



Photo 26: One drum of hazardous waste observed on a secondary containment pallet on the loading dock outside of the hazardous waste CAA. The drum was labeled D001 / F003 / F005 hazardous waste flammable liquid (acetone / toluene) and identified with a flammable liquid DOT hazard placard. The drum was dated 10/07/2020, and the secondary containment unit was full of liquid. Mr. Lucas explained that the drum was hit with a forklift during loading activities, which caused it to leak. Because the leaking drum could not be loaded onto the truck for transport off-site, it was moved out to this portable secondary containment unit



Photo 27: Damage to the 55-gallon drum observed on a secondary containment pallet on the loading dock outside of the hazardous waste CAA. The drum was labeled D001 / F003 / F005 hazardous waste flammable liquid (acetone / toluene) and identified with a flammable liquid DOT hazard placard. The drum was dated 10/07/2020, and the secondary containment unit was full of liquid. Mr. Lucas explained that the drum was hit with a forklift during loading activities, which caused it to leak. Because the leaking drum could not be loaded onto the truck for transport off-site, it was moved out to this portable secondary containment unit.



Photo 28: Boxes of used lamps observed in the universal waste storage area within the hazardous waste CAA outbuilding: one box of 8-foot used fluorescent lamps, six boxes of 4-foot used fluorescent lamps, one box of 2.5-foot used fluorescent lamps and one box of used metal halide lamps. Four boxes of 4-foot lamps, the box of 2.5-foot lamps, and the box of metal halide lamps were not labeled. Two boxes of 4-foot lamps were not closed. None of the boxes were marked with an accumulation start date.



Photo 29: Three boxes of 4-foot used fluorescent lamps observed in the universal waste storage area within the hazardous waste CAA outbuilding. The boxes are not labeled as universal waste lamps, and one of the boxes is open.



Photo 30: Three boxes of 4-foot used fluorescent lamps observed in the universal waste storage area within the hazardous waste CAA outbuilding. The brown cardboard box is not labeled as universal waste lamps, and it is open. The white boxes are labeled as universal waste lamps, and they are closed.