

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Process Barron Plant #1
2770 Welborn Street
Pelham, Alabama 35055
Cullman County
EPA ID Number: AL0000028811

3) Responsible Official

Rhonda Harrell
EHS Director
Process Barron Plant #1
2770 Welborn Street
Pelham, Alabama 35055
rharrell@processbarron.com

4) Inspection Participants

Rhonda Harrell	Process Barron Plant #1
Michael Stewart	Process Barron Plant #1
Brent Pockrus	Process Barron Plant #1
Corey Holmes	ADEM Land Division
Paula Whiting	US EPA Region 4

5) Date and Time of Inspection

January 22, 2024 at 9:30 a.m. CST

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

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

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b) [40 C.F.R. § 262.16)], SQG may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(1)2.(ii) [40 C.F.R. § 262.16] (hereinafter referred to as the "SQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6) (b) or (7)(a)) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7 and 8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Process Barron Plant #1, EPA ID Number: AL0000028811 with the applicable regulations.

8) Facility Description

Process Equipment, Inc. dba Process Barron Plant #1 does metal fabrication and machining of large industrial fans mainly for pulp and paper, and cement companies. Process Barron is located at 2770 Welborn Street in Pelham, Alabama, and was established in 1981. Process Barron Plant #1 is located on 6 acres. The facility operates 24 hours per day, 5 days per week in two 8-hour shifts. Process Barron Plant #1 employs approximately 100 full time employees.

Process Barron Plant #1's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated January 12, 2018, characterized the facility as a Small Quantity Generator (SQG) of hazardous waste that generates ignitable (D001), Chromium (D007), Methyl Ethyl Ketone (D035),

spent non-halogenated solvents (F003) and (F005) and universal wastes.

9) Previous Inspection History

This facility has not been inspected by either the EPA or Alabama Department of Environmental Management (ADEM).

10) Findings

On January 22, 2024, EPA inspector Paula Whiting, accompanied by Alabama Department of Environmental Management (ADEM) inspector Corey Holmes, arrived at Process Barron Plant #1 at approximately 9:30 a.m. CST. Mrs. Rhonda Harrell, EHS Director and Mr. Michael Stewart, V.P. of Operations received the inspectors. The inspectors introduced themselves, showed their credentials to Mrs. Harrell and Mr. Stewart, and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records.

Mrs. Harrell and Mr. Stewart provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representatives led the inspectors on a tour of the facility operations. Below is a description of the observations made during the inspection.

The tour began in the Main Receiving Area where facility staff inspected the fans sent in for service and made repair recommendations to customers. The inspectors observed in the Main Receiving Area large rotors from different industries waiting to be serviced.

Mrs. Harrell and Mr. Stewart explained that there was an internal blast booth with external baghouses directly outside the door. At the time of the inspection, the inspectors observed two unmarked black 55-gallon drums underneath the baghouses (Picture 1). The inspectors explained to the facility that two 55-gallon containers with the same hazardous waste content side by side were a 90-day area. In addition, there was spent blast media on the ground around the drums (Pictures 2-3). Mrs. Harrell and Mr. Stewart confirmed that the spent blast media in the drums was disposed of as hazardous waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i) [40 C.F.R. § 262.16(b)(6)(i)], which is a condition of the SQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)8.(i) [40 C.F.R. § 262.16(b)(8)(i)], which is a condition of the SQG 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.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)2.(iv) [40 C.F.R. § 262.16(b)(2)(iv)], which is a condition of the SQG 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.

The facility has an External Blast Media booth that uses black beauty blast media to remove paint and rust from industrial fan parts. The media has been tested and the analytical results were non-hazardous. However, the booth was not fully enclosed and the spent blast media was allowed to release to the ground and into the stormwater drain behind the blast media booth (Pictures 4-10). The used black beauty media was scooped off the ground and placed into a red cubic yard roll-off for disposal at Big Sky Landfill.

The less than 180-day hazardous waste central accumulation area (CAA) was located between the baghouses and the external blast media booth. The inspectors observed seven 55-gallon drums of hazardous waste sitting on pallets (Pictures 11-14). Five of the drums did not have start accumulations dates and two the drums were not labeled and did not have markings. In addition, one of the drums was a satellite accumulation area (SAA) drum that was not at or near the point of generation and not in control of the operator.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i) [40 C.F.R. § 262.16(b)(6)(i)], which is a condition of the SQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6) (b) or (7)(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7 and 8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)].

The EPA inspector observed two used lead acid batteries sitting outside the maintenance shed (Picture 15). When asked, Mr. Stewart stated the batteries would be returned to the vendor, Interstate Batteries.

Back inside the facility, the inspectors toured the process and observed discarded rags in the garbage and various aerosol cans in use. Mrs. Harrell explained that the rags were supposed to be

collected in red fire cans for disposal by Safeway Industries. The used rags may have contained WD-40, oil and/or grease (Picture 16). At the time, the inspectors did not observe any rags being used with solvent.

The Fabrication Area was visited next, and the inspectors observed the burn tables with slag attached. Mr. Stewart explained that the slag was non-hazardous and cleaned out during maintenance. During the inspection one of burn tables was down for repair (Pictures 17-18).

The Paint Area was in the rear of the facility. The area consisted of a paint booth with a prep area, a crane to move the rotors, and a large roll-off for trash. The Paint Technician explained that 5-gallon containers were used to collect the paint waste when the paint guns were purged (Picture 19). The inspectors observed that the solvent used in the paint booth was labeled as "Xylenes." Mr. Holmes explained that if the facility was using xylenes greater than 10% concentration, then the xylenes were hazardous waste. When Mr. Brent Pockrus looked up the safety data sheet for this product it was listed as 100% Xylenes. Mrs. Harrell explained that she previously advised the paint employees to place the spent personal protective equipment into the red cans until proper disposal could be determined.

Mr. Holmes, ADEM inspector, explained that any personal protective equipment (gloves, Tyvek, respirator, filters), rags, containers, etc., that has been contaminated with the xylene and had to be discarded and disposed of as hazardous waste. At the time of the inspection, the inspectors observed Tyvek previously worn by the paint technician discarded in the garbage (Picture 20).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)7. [40 C.F.R. § 262.16(b)(7)], which incorporates ADEM Admin. Code r. 335-14-9-.01 [40 C.F.R. 268.7(a)(1)] and is a condition of the SQG Permit Exemption, a generator is required to comply with land disposal restrictions (LDR) for hazardous waste. *Process Barron Plant #1 was improperly disposing of discarded debris contaminated with xylene in the garbage.*

Also in the Paint Area, the EPA inspector observed an aerosol can discarded in the regular garbage roll-off instead of the universal waste container for aerosol cans. The inspectors recommended to Mrs. Harrell to reemphasize the need to collect the spent aerosol cans for proper disposal.

The Robovent baghouse was located outside the employee breakroom. At the time of the inspection, the inspectors observed two 55-gallon drum of hazardous waste that were closed and labeled (Pictures 21-22). However, the EPA inspector noticed that the labels were peeling off the drums, the two drums had the same content, and there were releases to the ground around the drums and underneath the baghouses (Pictures 23-24). It appeared to the EPA inspector that someone had tried to sweep up the area.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)6.(i) [40 C.F.R. § 262.16(b)(6)(i)], which is a condition of the SQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the

date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)8.(i) [40 C.F.R. § 262.16(b)(8)(i)], which is a condition of the SQG 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.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)2.(iv) [40 C.F.R. § 262.16(b)(2)(iv)], which is a condition of the SQG 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) Records Review

The inspectors requested the training records, the weekly inspection records, documentation provided to the local emergency response agencies, the 2021-2023 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated January 12, 2018.

The inspectors requested the training records for the employees handling hazardous waste. Training certificates for Rocky Coleman and Brad Campbell were requested. At the time of the inspection, the training records were not available. The inspectors advised Mrs. Harrell to provide the training records via email to both ADEM and the EPA.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)9(iii). [40 C.F.R. § 262.16(b)(9)(iii)] and ADEM Admin. Code r. 335-14-3-.01(6)(b)10, which is a condition of the SQG Permit Exemption, a generator is required to ensure that all employees are familiar with proper waste handling and emergency procedures. *No training records were available for review.*

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)10, Employee training. Facility personnel whose duties have a direct effect on hazardous waste management and/or hazardous waste accumulation, whether by direct contact with the hazardous waste or through hazardous waste management activities, must receive training. (i) The training program must consist of classroom instruction or on-the-job training that teaches employees to perform their duties in a way that ensures the facility's compliance with the requirements of 335-14-3 during normal site operations and emergencies; (ii) The small quantity generator must maintain at the site documentation that the required training has been administered to and completed by required employees. Documentation of training records must be maintained on-site for a period of at least three years from the date the employee last worked for the generator or until the generator closes, whichever comes first. (iii) The generator must maintain on-site a written description of the training required under 335-14-3-.01(6)(b)10.

The weekly inspection records from 2021 to May 2023 were reviewed. The previous EHS manager

was recently fired so no additional weekly inspections were available for review.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)2.(iv) [40 C.F.R. § 262.16(b)(2)(iv)], which is a condition of the SQG 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.

Hazardous and non-hazardous manifests were requested for 2021-2023. The manifests and land disposal restriction forms were not available at the time of the inspection. Mrs. Harrell stated that she would provide this information via email.

Pursuant to ADEM Admin. Code r. 335-14-3-.04(1)(a) [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

Documentation proving that the local emergency response agencies were notified of the potential releases from the facility were requested for review. At the time of the inspection, no documentation (i.e., green cards, emails, letters, etc.) was available for review. Mrs. Harrell stated that she would provide this information via email.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(6)(b)8.(vi)b. [40 C.F.R. § 262.16(b)(8)(vi)], which is a condition of the SQG Permit Exemption, a generator is required to (A) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at his facility and the potential need for the services of these authorities, and (B) maintain records documenting the arrangements made.

Analytical results for the spent black beauty blast media were reviewed. The results indicated the TCLP was below detection and thus non-hazardous. On February 23, 2023, ADEM approved disposal of the blast media at Big Sky Landfill.

The analytical results for the burn table slag were requested. At the time of the inspection, no results were available for review. Mrs. Harrell stated that she would provide this information via email.

12) Summary

The inspectors conducted the exit meeting with Mrs. Harrell, Mr. Stewart, and Mr. Pockrus. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Process Barron Plant #1 was inspected as a LQG of hazardous waste.

13) Signed

PAULA WHITING

Digitally signed by PAULA
WHITING
Date: 2024.04.03 09:31:55 -04'00'

Paula A. Whiting
Environmental Engineer

Date

14) Concurrence

ALAN NEWMAN

Digitally signed by ALAN
NEWMAN
Date: 2024.04.04 17:53:58 -04'00'

for Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

PROCESS BARRON PLANT #1

PELHAM, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

January 22, 2024

Photos taken by Paula A. Whiting

Camera Type: Olympus Tough

Serial Number: SC7374



Picture 1 – Internal Blast Booth SAA drums not labeled



Picture 2 – Internal Blast Booth SAA –baghouse dust released to the ground



Picture 3 – Internal Blast Booth SAA –baghouse dust released to the ground



Picture 4 – External Blast Media – non-hazardous black beauty media released to ground



Picture 5 – External Blast Media – non-hazardous black beauty media released to ground



Picture 6 – External Blast Media – non-hazardous black beauty media released to ground



Picture 7 – External Blast Media – non-hazardous black beauty media waste roll-off



Picture 8 – External Blast Media – non-hazardous black beauty media released to storm water drain



Picture 9 – External Blast Media – non-hazardous black beauty media released to storm water drain



Picture 10 – External Blast Media – non-hazardous black beauty media released to storm water drain



Picture 11 – 180-Day Hazardous Waste CAA with Paint Waste SAA



Picture 12 – 180-Day Hazardous Waste CAA



Picture 13 – 180-Day Hazardous Waste CAA



Picture 14 – 180-Day Hazardous Waste CAA



Picture 15 – Used lead acid batteries



Picture 16 – Paint Area trash with discarded rags



Picture 19 – Paint Area



Picture 17 – Fabrication Area burn table with slag



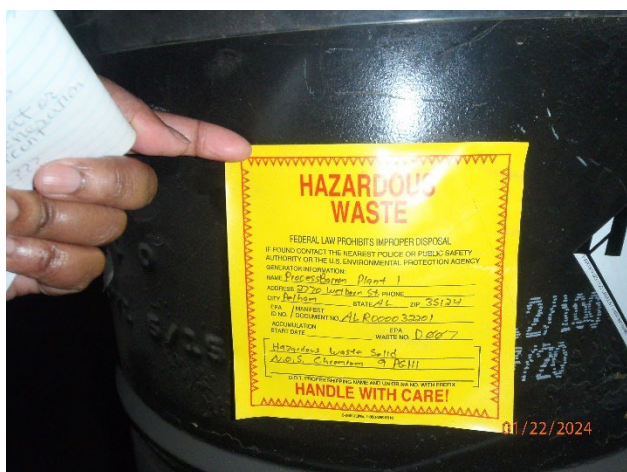
Picture 20 – Paint Area PPE debris discarded in garbage



Picture 18 – Fabrication Area burn table with slag



Picture 21 – Robovent Baghouse SAA drums



Picture 22 – Robovent Baghouse SAA drums



Picture 23 – Robovent Baghouse dust release to floor



Picture 24 – Robovent Baghouse dust release to floor