REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

ARMOR LITE TRAILER MFG LLC
1190 Hwy H
Sikeston, MO 63801-8209
(573) 471-1762

EPA RCRA ID No. MOR000546143

On

April 24, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division

INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Armor Lite Trailer Mfg. LLC (Armor Lite Trailers), located in Sikeston, Missouri, on April 23, 2024. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information necessary to determine compliance with the applicable regulatory and statutory requirements. This report and the attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected the facility as a Small Quantity Generator (SQG) of hazardous waste, a small quantity handler of universal waste, and a used oil generator. Armor Lite Trailers was last inspected for RCRA compliance on September 10, 2018, by the Missouri Department of Natural Resources (MoDNR). No findings or violations were observed or cited as a result of the 2019 MoDNR RCRA inspection.

PARTICIPANTS

Armor Lite Trailers:
Wesley Graviett, Facility Manager

EPA Region 7:
Koba Butkovich, ECAD (Lead Inspector)
Tim Evans, ECAD
Hayden Cassinger, MDNR, Environmental Program Assistant

INSPECTION PROCEDURES

On April 24, 2024, I, Mr. Evans, and Mr. Cassinger arrived at the facility at approximately 9:15 a.m. Prior to entry, I conducted a drive-by visual inspection. I did not observe any areas of

concern during the drive-by. Upon my arrival, I entered the main office, introduced myself, explained the purpose of the CEI, and asked for Mr. Wesley Graviett, listed as the site contact on the Hazardous Waste Site Information Verification Report (Attachment 2). The secretary contacted Mr. Wesley Graviett. Mr. Graviett met me and escorted me to his office where I and my colleagues, Mr. Cassinger and Mr. Evans, proceeded to conduct an entry briefing with him.

During the entry briefing, I and Mr. Evans presented our business cards and EPA credentials to Mr. Graviett. I explained the scope and procedures for the CEI. I explained the facility's right to make confidentiality claims and provided a Notice Regarding Proprietary/Confidential Business Information. I stated that at the conclusion of the CEI, he would be presented with a Confidentiality Notice (Notice) with which they could make or not make a claim of confidentiality for the facility. I also provided Mr. Graviett with a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining EPA's inspection authority, both of which he read.

A copy of each of the following documents was left with the facility during the inspection:

- RCRA Facility Access Information Sheet
- Business Cards
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Instructions for Responding to a Notice of Preliminary Findings
- Notice Regarding Proprietary/Confidential Business Information
- U.S. EPA Small Business Resources Information Sheet
- E-Manifest Fact Sheet: Generators
- Managing Your Hazardous Waste: A Guide for Small Businesses

I reviewed the Notification Acknowledgement/Verification Report (Verification Report) with Mr. Graviett (Attachment 2). Based on this review, as well as observations during the CEI, I made no edits to the Verification Report.

I conducted the visual inspection and the records review on April 24, 2024, accompanied by Mr. Wesley Graviett, Mr. Hayden Cassinger and Mr. Tim Evans. Mr. Graviett answered questions during the visual inspection of the hazardous waste accumulation containers. During the records review, I reviewed facility documentation such as the RCRA Contingency Plan, waste manifests, and hazardous waste determination records. I utilized the Missouri inspection checklist to document my observations.

I completed the visual inspection and conducted an exit briefing on April 24, 2024, with Mr. Graviett. During the exit briefing, I provided a Receipt for Documents and Samples, which Mr. Graviett signed, acknowledging receipt (Attachment 3). I provided Mr. Graviett the Notice, which he signed indicating no confidential business information had been provided (Attachment 4). I also provided Mr. Graviett a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (Attachment 5).

A map of the facility was obtained during the CEI and is included as Attachment 6. The 10 photographs taken during the CEI are in Attachment 1.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Armor Lite Trailers is a trailer manufacturing facility. According to Mr. Graviett, Armor Lite Trailers began operations at its current location in 2012. Armor Lite Trailers manufactures approximately 600 trailers per year and at a maximum rate of 5 trailers per day.

The facility consists of one building sized at approximately 25,000 square feet. Armor Lite Trailers employs approximately 90 personnel who work Monday through Friday on work shifts from 5 a.m. to 5. p.m. Depending on production demands, there is an additional work shift on Saturday without painting processes.

Hazardous wastes generated at the facility include D001, F005, and D035 hazardous waste paint and solvent related material. The facility is also a small quantity handler of universal waste lamps and a used oil generator.

2. RCRA Status

According to the RCRAInfo database, Armor Lite Trailers has notified as a Large Quantity Generator (LQG) (generating more than 1,000 kilograms [kg] of hazardous waste per month) of D001, D035, and F005 hazardous waste, and as noted on the Verification Report provided by the EPA (Attachment 2). Prior to the inspection, I reviewed Armor Lite Trailer's waste disposal records (manifests) and noted that Armor Lite Trailers consistently generated and shipped less than 2,200 pounds of hazardous waste for the previous twelve months prior to the inspection, from March 2023 to March 2024. In addition, Armor Lite Trailers had less than 2,200 pounds of hazardous waste in accumulation at the time of inspection. Thus, during the CEI, I determined that Armor Lite Trailers was operating as a Small Quantity Generator (SQG) of hazardous waste, through a review of current operations, an interview with Mr. Graviett, and a review of waste disposal records (manifests) and summary reports. Therefore, I inspected Armor Lite Trailers as a Small Quantity Generator of Hazardous Waste. I also inspected the facility as a Small Quantity Handler (SQH) of universal waste lamps (accumulating less than 5,000 kg of universal waste at any time) and a used oil generator.

3. Waste Streams

This section of the CEI report describes waste streams generated by the facility, including the facility's waste determinations and associated waste codes, waste generation process and rate, management of waste at the facility, and ultimate disposition of the waste. The following discussion of waste streams is based on my interview with Mr. Graviett, the visual inspection, and my review of available documentation.

Hazardous Waste Paint/Solvents are generated during facility operation and manufacturing of trailers. Armor Lite Trailers has an enclosed paint booth in the north section of the facility where waste paint and solvent is generated. Once generated, the waste paint and solvents are containerized outside of the paint booth in 55-gallon satellite accumulation containers. Once full, these containers are taken to a 180-day Central Accumulation Area (CAA) at the northern end of the facility. The facility considers waste paint and solvents to be hazardous (D001, D035, F005) based on product and process knowledge. The waste is generated at varying rates depending on production demand, with a monthly generation of 2 to 5, 55-gallon drum containers, or 800 to 2,000 pounds (0.4 to 1.0 tons) per month of waste paint and solvents. The waste paint containers are shipped monthly by Inter-Rail Systems Inc. to Lonestar Industries for treatment and disposal. Safety Data Sheets of the solvents utilized in the paint booth are included in Attachment 8.

During the CEI, I observed 3, 55-gallon drum Hazardous Waste Accumulation Containers (HWACs), in the 180-day CAA that were each full of hazardous waste paint and solvents (Attachment 1, Photograph 1 and 2). The HWACs were structurally sound, closed, and labeled with the words "Hazardous Waste" and the start date of accumulation. However, due to the orientation of the containers in the CAA, the start dates of accumulation for 2 of the 3 containers were not clearly visible for inspection, as required by 10 CSR 25-5.262(1), referencing 40 CFR 262.34(d)(1) **(NOPF No. 1)**. The facility applied additional date labeling at the time of inspection to the top of the containers, making them visible for inspection (Attachment 1, photograph 10). I observed no additional issues with the HWACs.

During the CEI, I observed a satellite container outside of the facility's paint booth. The satellite container had a dented lid that prevented the container from fully closing (Attachment 1, Photograph 3). Thus, the satellite container was not closed, as required by 10 CSR 25-5.262(1), referencing 40 CFR 262.34(c) (**NOPF No. 2)**. At the time of inspection, the facility replaced the dented lid with a lid that allowed the container to be properly closed (Attachment 1, photograph 7).

Solvent Wipes and Gloves

Outside of the paint booth, I observed a pair of gloves on a work bench with apparent paint stains (Attachment 1, photograph 4). Outside of the paint booth, I also observed cotton towel wipes and gloves in a trash can with apparent paint stains (Attachment 1, photograph 5).

I asked Mr. Graviett about the generation of the work gloves and wipes. Mr. Graviett described how these gloves were utilized by employees in the paint booth and during the painting process. During daily operations, around two painters would operate in the paint booth and paint while wearing the work gloves, during which the gloves would come in contact with both paint and S-6400 solvent, considered to be F005 listed hazardous waste. The Safety Data Sheet for S-6400 solvent is included in Attachment 8. The work gloves would be disposed of in the trash at a rate of two pairs of gloves per day of paint operation, or a monthly generation of approximately 20 gloves since at least 2014. The wipes were utilized during paint operations for spot wiping of trailer components with acetone solvent. The wipes would routinely be disposed of in the general trash at a rate of approximately 6 wipes per day of operation.

On the day of inspection, I had determined that Armor Lite Trailers had failed to make a hazardous waste determination on the work gloves and cloth wipes **(NOPF No. 3)**. This finding was rescinded after the inspection.

During the closing conference, Mr. Graviett stated that Armor Lite Trailers considered the work gloves to be D001 and F005 listed hazardous waste, due to product and process knowledge of the S-6400 solvent the gloves were exposed to, and would be disposed of in the same satellite container as the waste paint and solvent. In addition, Mr. Graviett stated that the cloth wipes were only exposed to acetone and would be laundered every week for reuse. Based on the used solvent contaminated wipes and gloves observed in the general trash, and the facility's hazardous waste determination during the inspection, I determined after the inspection that Armor Lite Trailer had disposed of hazardous waste without using an authorized hazardous waste treatment, storage or disposal facility or resource recovery facility as required by Section 260.380.1(7) RSMo. (**NOPF No. 4)**. I also rescinded NOPF No. 3.

An email was sent after the inspection, on August 19, 2024, informing the facility of the additional finding of NOPF No. 4 and the rescinding of NOPF No. 3.

Used Oil is generated during maintenance operations at Armor Lite Trailers. The facility manages used oil according to provisions of 40 CFR Part 279. According to Mr. Graviett, the facility generates approximately 5 gallons of used oil per year. The used oil is handled by a third party, Weiss.

During the CEI, I observed no used oil containers in accumulation.

Waste Lamps are generated during facility maintenance, including mercury-containing fluorescent lamps. The rate of generation of waste lamps varies, with approximately 320 bulbs generated over the past 5 years of operation. The facility manages all waste lamps as universal waste according to provisions of 40 CFR Part 273. Waste lamps are accumulated in fiberboard containers adjacent to the HWCAA. I observed no waste lamps in accumulation at the time of inspection.

4. Manifests

I reviewed hazardous waste manifests for the years 2021, 2022, 2023, and 2024 and their associated Land Disposal Restrictions (LDR) notifications during the CEI. I noted no deficiencies with hazardous waste manifests during the CEI.

5. Required Response Equipment and Hazard Management

Per 10 CSR 25-5.262(1), incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(c), an SQG must maintain emergency response equipment. During the CEI, I observed spill kits, fire

alarms, and fire extinguishers at or near the facility HWCAA, outside of the paint booth, and elsewhere in the facility.

During the inspection, I observed burnt cigarette butts on the manufacturing floor south of the paint booth and in the vicinity of a "No Smoking" sign (Attachment 1, photograph 9). Mr. Graviett stated that employees were allowed to smoke in certain areas of the facility, such as fabrication areas, but not in the paint booth, around the satellite accumulation area outside of the paint booth, or in proximity to the HWAC. I observed a few additional cigarette butts in the surrounding fabrication areas. I also examined the floor around these restricted areas and observed no cigarette butts in immediate proximity to accumulation areas of hazardous waste paint or the eastern work entrance of the paint booth. Mr. Graviett stated that he would review the facility's smoking policy in these areas remind facility staff of the restrictions after the inspection. However, after the inspection I determined that Armor Lite Trailers had failed maintain and operate 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, as required by 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31 **(NOPF No. 5).** I noted no other deficiencies related to emergency response equipment.

An email was sent after the inspection, on August 19, 2024, informing the facility of the additional finding of NOPF No. 5.

6. Preparedness and Prevention

Per 40 CFR 262.16(b)(9)(1), an SQG must have identified an emergency coordinator (EC) familiar with facility operations. Armor Lite Trailers maintains a RCRA Contingency Plan that identifies assigned Emergency Coordinators and their contact information (cellular and home phone numbers). I reviewed the Contingency Plan for LQG-required content and noted no deficiencies.

Per 10 CSR 26-6.262(1), incorporating 40 CFR 262.34(d)(5)(ii)(A) through (C) and 40 CFR 262.16(b)(9)(ii), an SQG must post by the telephone the name of and contact information for the EC; the phone number of the fire department; and locations of fire extinguishers and spill response equipment. The EC names and phone numbers, and the phone number of the fire department. This information was posted outside of the break room, which contained a landline phone (Attachment 1, Photograph 8). The locations of fire extinguishers and spill response equipment, and the EC names and phone numbers, are also included in the Contingency Plan. However, I determined after the inspection that the locations of fire extinguishers, spill response equipment, and the fire alarm were not posted as information next to the break room phone, as required by 10 CSR 25-5.262(1), incorporating 40 CFR 262.34(d)(5)(ii)(B) **(NOPF No. 6).** I reviewed the facility's Contingency Plan, including facility maps, and noted no additional deficiencies related to preparedness and prevention.

An email was sent after the inspection, on August 19, 2024, informing the facility of the additional finding of NOPF No. 6.

7. Personnel Training Requirements

Per 10 CSR 25-5.262(1), incorporating 40 CFR 262.34(d)(5)(iii), an SQG must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies. Mr. Graviett explained that all management and production personnel, including ECs, receive on-the-job waste handling training and initial introductions and annual refreshers of the Contingency Plan. I noted no deficiencies with the types and frequencies of personnel training during the CEI.

8. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

(1) Failure to have dates of accumulation on HWACs visible for inspection, as required by 10 CSR 25-5.262(1), referencing 40 CFR 262.34(d)(1) **(NOPF No. 1);**

(2) Failure to keep a satellite container closed, as required by 10 CSR 25-5.262(1), referencing 40 CFR 262.34(c). (**NOPF No. 2);**

(3) RESCINDED

(4) Added after inspection – Failure to use an authorized hazardous waste treatment, storage or disposal facility, or resource recovery facility, as required by Section 260.380.1(7) RSMo (**NOPF No. 4).**

(5) Added after inspection – Failure to maintain and operate 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. **(NOPF No. 5)**.

(6) Added after inspection – Failure to post the locations of fire extinguishers and spill control material, and if present, fire alarm, are not posted next to the phone, as required by 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(B). **(NOPF No. 6)**.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

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Koba Butkovich
Inspector
ECAD/CB/RCRA, EPA Region 7

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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments

1. Photographic Documentation (10 Photos and Photolog) (11 Pages)
2. Notification Acknowledgement/Verification Report (1 Pages)
3. Receipt for Documents and Samples (1 Page)
4. Confidentiality Notice (1 Page)
5. Notice of Preliminary Findings (2 Pages)
6. Facility Map (2 Pages)
7. MDNR Small Quantity Generator Checklist (10 Pages)
8. Safety Data Sheets for Solvents (25 Pages)