



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 16, 2020

VIA ELECTRONIC MAIL

Mr. Al Davis
Laboratory / EHS Manager
Possehl Connector Services
445 Bryant Boulevard
Rock Hill, South Carolina 29732
adavis@possehlconnector.com

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Possehl Connector Services
EPA ID: SCD982085813

Dear Mr. Davis:

On February 20, 2020, the U.S. Environmental Protection Agency, along with the South Carolina Department of Health and Environmental Control (SCDHEC) conducted a CEI at Possehl Connector Services located in Rock Hill, South Carolina to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report that indicates deficiencies of RCRA were discovered during the inspection. A copy of this report has been forwarded to the SCDHEC for follow-up and further evaluation in accordance the 2003 Hazardous Waste Civil Enforcement Response Policy.

If you have any questions regarding this matter, please contact Laurie Benton DiGaetano, of my staff, by phone at (404) 562-8948 or by email at benton-digaetano.laurie@epa.gov.

Sincerely,

Parvez Mallick
Acting Chief
Land, Asbestos and Lead Section

Enclosure

cc: Beverly McLeod, SCDHEC (electronic copy, mcleodbs@dhec.sc.gov)
Alaina Holst, SCDHEC (electronic copy, holstak@dhec.sc.gov)
Alex Latta, SCDHEC (electronic copy, lattaam@dhec.sc.gov)

RCRA Inspection Report

1) Inspector and Author of Report

Laurie Benton DiGaetano, Environmental Engineer
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency (EPA), Region 4
61 Forsyth Street, S.W. Phone: 404-562-8948
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2) Facility Information

Possehl Connector Services EPA ID# SCD982085813
445 Bryant Boulevard
Rock Hill, South Carolina 29732

3) Responsible Officials

Mr. Al Davis, Laboratory / EHS Manager

4) Inspection Participants

Al Davis, Possehl Connector	Alaina Holst, SCDHEC
Randy Herron, Possehl Connector	Alex Latta, SCDHEC
Laurie Benton DiGaetano, USEPA	

5) Date of Inspection

February 20, 2020

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), South Carolina Hazardous Waste Management Regulations (SCHWMR) R.61-79, 260 through 270¹, 273, 278, & 279; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

1 South Carolina's newly adopted Generator Improvements Rule (GIR) regulations are currently under review by EPA and have not been authorized. However, for ease of reference and for consistency with the State Inspection Report, this CEI Report will cite to the South Carolina and federal hazardous waste regulations as amended by the GIR. New requirements that have become effective pursuant to the GIR, but have not yet been authorized, are noted with an asterisk. These provisions are effective and enforceable as a matter of State law, but they are not federally enforceable.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Possehl Connector Services' compliance with the applicable requirements of RCRA and the corresponding SCDHEC regulations. This was an EPA lead inspection.

8) **Facility Description**

Possehl Connector Services, Inc., a subsidiary of Possehl Electronics, owns and operates the subject facility in Rock Hill, South Carolina. This facility is one of Possehl Electronics' eleven production sites worldwide, and their only production site in the United States. Possehl Connector Services operates as a job-shop, supplying requested reel to reel selective electroplating of gold, silver, palladium, palladium nickel, nickel, nickel tungsten, tin and tin lead for connectors and other lead frame type parts, which are provided by the customer. These parts are used in a wide range of electronic applications for automotive, communication and mobile solutions, consumer electronics, aerospace and military, industrial automation applications, medical, security and control systems. The facility operates ten similar, but discrete process plating lines under the NAICS Code 332813 for Electroplating, Plating, Polishing, Anodizing, and Coloring. The facility has approximately 65 employees, and operations run on three shifts, Monday-Friday.

The subject facility does not generate wastewater treatment sludge on-site, so the primary wastes include waste acids, dragout rinse waste, waste filters, floor sweepings, solvents, and PPE. Dragout rinse waste from precious metals plating may contain gold, palladium or silver, so it is accumulated separately and shipped for precious metals recycling. Other dragout rinse wastes are accumulated on-site, stored in a 5,000-gallon hazardous waste storage tank, and shipped off-site by a waste hauler. In addition, each plating process is equipped with one or two filter chambers holding either seven or thirty filters. The filters are changed out once every ten weeks during routine scheduled preventative maintenance activities.

Possehl Connector Services, Inc. has owned and operated the subject facility for nearly thirty years, and the facility has operated as a large quantity generator of hazardous waste during most of that time. The most recent biennial report is dated 01/01/2017, and it identifies the following hazardous waste streams as being generated on-site: D002 / D008 spent tin lead plating bath, F009 spent gold plating bath, F009 spent gold back strip, F009 spent gold filters, D008 spent nickel and tin lead filters, D008 floor spills, D001 spent mineral spirits, and D002 waste palladium bath and rinses.

9) **Previous Inspection History**

SCDHEC has conducted five RCRA CEIs at the subject facility since 2001 and found two or more violations during each of those inspections. On April 23, 2015, SCDHEC conducted the most recent RCRA CEI at the subject facility and found apparent

violations of RCRA's requirements for hazardous waste container management, training records, contingency plan, quarterly reporting, and weekly inspections. On December 10, 2015, SCDHEC entered into a Consent Order with the facility to resolve the violations.

10) Findings

On February 20, 2020, EPA inspector Laurie Benton DiGaetano, accompanied by SCDHEC inspectors Alaina Holst and Alex Latta, arrived at Possehl Connector Services at approximately 9:15 a.m. Mr. Al Davis, Laboratory / EHS Manager, immediately received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. Mr. Davis explained that the Environmental Technician, Mr. Randy Herron, was out sick. Therefore, Mr. Davis participated in the opening conference and then took the inspectors on a tour of the Facility operation.

Chemical Storage Area: Raw materials and wastes are stored and managed in the facility's chemical storage area. Possehl Connector Services manages the area as a Central Accumulation Area (CAA) for hazardous waste, and also manages two Satellite Accumulation Areas (SAAs) within the room. The room is equipped with an eyewash station and drench hose. Employees carry cell phones while working in this area, and a land-line telephone is available in the adjacent laboratory. As the inspection participants entered the room, the system used to prepare solutions for the plating process was located along the wall to the right, next to the laboratory; two large metal shelving systems, which were separated by two filter draining units, were located along the far wall; a collection system and sump for pumping rinsewaters to the hazardous waste storage tank was located in the far left corner of the room; and two 500-gallon tanks for managing F007 / D003 hazardous waste cyanide solution (contains potassium cyanide) were located along the wall to the left of the room.

The inspectors observed one cubic yard box labeled hazardous waste solid (lead) contaminated filters, PPE, brooms, and floor sweepings on the bottom right shelf of the large metal shelving system (Photo #1). Mr. Davis explained that the container is used to manage and to store hazardous wastes generated from routine preventative maintenance activities. The box was marked with an accumulation start date of 02/04/2020 and identified as NA3077 and DOT hazard class 9.

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

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

The first SAA in this room is located on the wall to the right in this room just outside the laboratory door (Photo #2). The inspectors observed a red flip-top 20-gallon trash can in this SAA. The can was identified as a workplace accumulation container and labeled hazardous waste solid air and bath filters and used PPE (containing lead), but it was not marked with an indication of the hazards.

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 any 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) 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 conditions listed in 25 S.C. Code Ann. Regs. 61-79.262.15(a)* [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii)* [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label containers with an indication of the hazards of the contents.

The two filter draining units located between the large metal shelving units are designed to drain filters that have been used in the plating lines (Photos #3 and 4). One of the units is used to drain filters removed from the nickel, tin and lead plating lines. This unit is labeled NI / SNPB filters (Photo #5) and identified with a DOT hazard 9 placard. It is also labeled D008 hazardous waste solids (lead) contaminated filters, PPE, brooms, and floor sweepings. Wet filters are placed above a wire mesh inside the unit and the lid is closed while liquids drain from the filters to the bottom of the unit. Once drained, the dry filters are placed in a solid hazardous waste storage container. Drained liquids are pumped from the bottom of this unit into the collection system and sump in the corner of the room. Although neither of the two filter draining units were marked with an accumulation start date, the facility maintains a log for tracking the time and date that materials are placed into and removed out of the units. The inspectors observed this log hanging on the wall behind the draining units.

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 with an indication of the hazards of the contents and with the date upon which each period of accumulation begins clearly visible for inspection on each container.

The second draining unit located between the large metal shelving units is used to drain filters removed from the gold plating lines. This unit is labeled gold filters and identified with a poison hazard placard (Photo #6), but it was not labeled with the words “hazardous waste.” Wet filters are placed above a wire mesh inside this unit and the lid is closed while liquids drain from the filters. Once drained, the dry filters are placed into a storage container and shipped off-site for precious metals recycling. Drained liquids are pumped to one of the 500-gallon F007 / D003 hazardous waste cyanide solution (contains potassium cyanide) recirculation tanks. This filter draining unit was also not marked with an accumulation start date.

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

The inspectors observed one 300-gallon tote labeled F009 / D003 hazardous waste cyanide solution (potassium cyanide) on the middle shelf of the large metal shelving system to the left of the draining units (Photo #7). Mr. Davis explained that the container is used to manage and to store hazardous wastes rinsewaters generated from the gold plating process. The tote was identified with a poison hazard placard, but it was not marked with an accumulation start date because it was empty.

The collection system and sump in the corner of the chemical storage area room is used to transfer liquid hazardous waste from this area into the outdoor hazardous waste storage tank (Photo #8). From the production area, liquid waste is drained into a transfer container or drum and brought into the chemical storage area. The contents of the containers are pumped or poured into the sump vessel located in the corner of the room. The vessel was not labeled as hazardous waste, identified with an indication of the hazards of its contents, or marked with an accumulation start date. The lid remained open, because it was equipped with a strainer basin that can filter potential debris from the waste stream (Photo #9) and with a hole through which the pump wand can be placed into the vessel (Photo #10). The inspectors observed liquid sitting inside the sump unit.

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)(A-C)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label containers with the words “Hazardous Waste;” with an indication of the hazards of the contents; and with the date upon which each period of accumulation begins clearly visible for inspection on each container.

Possehl Connector Services manages hazardous waste liquids that contain precious metals in two 500-gallon storage tanks inside the chemical storage area (Photo #11). Each tank was labeled F007 / D003 hazardous waste cyanide solution (contains potassium cyanide) and identified with a poison hazard placard, but neither was identified with a reactive hazard placard. One tank was marked with an accumulation start date of 01/20/2020, and the other was marked with an accumulation start date of 01/14/2020. Both tanks were located within the same secondary containment unit. Liquids are pumped into these tanks from containers used to transfer the liquids from the point of generation to the tank. Liquids are kept circulating within each tank in order to prevent the precious metals from stratifying. This allows the facility to obtain a true representative sample of the material to estimate the amount of precious metals that may be recovered from the waste.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(5)(ii)(B)* [40 C.F.R. § 262.17(a)(5)(ii)(B)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label tanks with an indication of the hazards of the contents.

The inspectors observed two portable secondary containment pallets holding ten 55-gallon drums on the floor toward the center of the chemical storage area room (Photo #12). The five white poly drums held plating solution that will be returned to the plating process for further use. Four of the blue poly drums were labeled D002 / D008 hazardous waste corrosive liquid (phosphoric and methane sulfuric acid) and identified with a corrosive hazard placard. These drums are used to transfer hazardous waste from the point of generation to the sump tank in this area. Although the drums were not identified with a toxic hazard placard, they were all empty at the time of the inspection. The final drum (Photo #13) was labeled F007 hazardous waste toxic solid inorganic (potassium cyanide) and identified with a toxic hazard placard. The drum was dated 01/23/2020 and contained drained filters from the gold plating line. According to Mr. Davis, these filters will be sent off-site for precious metals recycling.

The second designated SAA was observed just inside the door near the wall on the far left in this room (Photo #14). The inspectors observed one 20-gallon step-to-open red trash can and one 5-gallon red step-to-open can in this SAA. The hazardous waste label observed on the 20-gallon container indicated that the waste was generated by Neco Metal Finishing, the company that operated at this location before Possehl Connector Services. The container appeared to be accumulating used PPE, absorbents and other solid hazardous wastes, and the volume of waste inside the container prevented the lid

from closing completely. The container label did not include a description of the waste, and the container was not marked with an indication of the hazards of its contents. The 5-gallon container (Photo #15) was labeled as hazardous waste gold / palladium filters, but it was not marked with an indication of the hazards of its contents.

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)(ii)* [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 containers with an indication of the hazards of the contents.

Outside: The inspectors observed a 5,000-gallon hazardous waste storage tank in an area just outside the bay door of the shipping and storage room (Photo #16). The tank was labeled as D002 / D008 hazardous waste, identified with a corrosive hazard placard, and marked with an accumulation start date of 02/04/2020. The tank was not identified with a toxic hazard placard. The inspectors did not observe a secondary containment dike surrounding the tank, but Mr. Davis explained that the it is a double-walled tank.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(5)(ii)(B)* [40 C.F.R. § 262.17(a)(5)(ii)(B)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label tanks with an indication of the hazards of the contents.

Shipping / Storage: The facility accumulates universal hazardous waste at the bottom of a shelving unit in the shipping and storage area. According to the records provided during the inspection, the facility sent two shipments of universal waste offsite during calendar year 2017 and another on 07/31/2018. The most recent shipment of universal waste was sent on 06/13/2019, but only included universal waste bulbs.

The inspectors observed three 5-gallon pails in this area during the inspection (Photo #17). The pails were all closed, labeled as universal hazardous waste, and dated 06/01/2015. One pail was labeled for lead-acid batteries; another was labeled for alkaline batteries; and the last pail was labeled for mercury devices.

Universal hazardous waste fluorescent bulbs are also managed in this area (Photo #18). The inspectors observed one box of 4-foot used fluorescent lamps, which was open and not labeled. The inspectors also observed one box of 8-foot used fluorescent lamps, which was open and labeled universal waste. Finally, the inspectors observed a box of 4-

foot fluorescent bulbs, which was open and labeled with the hand-written words “good bulbs.” None of the boxes of used fluorescent bulbs were marked with an accumulation start date.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste 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. 61-79.273.15(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.

Process Chemical Storage Area: The facility manages a SAA inside the process chemical storage area, and the inspectors observed one 20-gallon step-to-open red trash can in this SAA (Photo #19). The hazardous waste label observed on the 20-gallon container indicated that the waste was generated by Neco Metal Finishing, the company that operated at this location before Possehl Connector Services. The container appeared to be accumulating used PPE, absorbents and other solid hazardous wastes, but the container label did not include a description of the waste. The container was not marked with an indication of the hazards of its contents.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii)* [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 containers with an indication of the hazards of the contents.

Clean Room: The facility manages a SAA inside the clean room, and the inspectors observed one 20-gallon step-to-open red trash can in this SAA. The container was labeled D008 air and bath filters and PPE hazardous waste solid (contains lead), but the container was not marked with an indication of the hazards of its contents.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii)* [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 containers with an indication of the hazards of the contents.

Laboratory: Mr. Davis explained that the facility does not maintain a designated SAA inside the laboratory. Instead, laboratory personnel immediately transfer any hazardous waste generated in the laboratory to the collection system and sump in the corner of the chemical storage area room. The inspectors did not observe any hazardous waste

containers in the laboratory.

Hazardous Waste Manifests: The inspectors reviewed the hazardous waste manifest records available for calendar years 2017-present. Records indicate that shipments from the facility include D002 / D007 / D008 / D010 waste corrosive liquids acidic inorganic (phosphoric acid) shipments to Waste Management (ALD000622464); F009 / D003 / D012 waste cyanide solutions (potassium aurocyanide), F009 / D003 waste cyanide solution, and F007 waste toxic solid (potassium cyanide) shipments to Advanced Chemical Company (RID059735761); D008 hazardous waste solid (lead) shipments to Envirite of PA (PAD010154045); and F009 / D003 waste cyanide solution shipments to Gannon and Scott (RID981886104).

Hazardous waste manifests for twenty-four shipments sent off-site during calendar years 2017-2019 did not have the returned copy of the manifest, which had been signed by the destination facility. These manifests include the following shipments to Waste Management (ALD000622464): manifest 017058851JJK sent on 06/13/2017, manifest 017772054JJK sent on 07/18/2017, manifest 017058977JJK sent on 08/14/2017, manifest 017772347JJK sent on 11/30/17, manifest 016534169JJK sent on 10/27/2017, manifest 017058981JJK sent on 01/02/2018, manifest 018414118JJK sent on 02/06/2018, manifest 016534170JJK sent on 03/01/2018, manifest 018415963JJK sent on 04/02/2018 manifest 018500003JJK sent on 04/30/2018, manifest 018415644JJK sent on 05/31/2018, and manifest 018415667JJK sent on 06/18/2018. They also include manifest 011280694JJK for a shipment to Advance Chemical Company (RID059735761) sent on 06/08/2017, manifest 011280691JJK for a shipment to Gannon and Scott (RID981886104) sent on 04/10/2017, manifest 010977659FLE for a shipment to Envirite of PA (PAD010154045) sent on 11/17/2017, manifest 017283630JJK for a shipment to Metallix Refinishing (NCD095119210) sent on 11/20/2017, and eight additional manifests for shipment sent between 07/20/18 and 12/31/2019. No records were provided during the inspection to document that the facility contacted the transporter and/or the designated facility to determine the status of the hazardous waste or that Possehl Connector Services had submitted an Exception Report for the shipment.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(1) and (2) [40 C.F.R. § 262.42(a)(1) and (2)], an LQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Inspection Records: Possehl Connector Services personnel creates and maintain a spiral-bound notebook for recording all inspections of hazardous waste storage areas in a given month. The inspectors reviewed the monthly notebooks available for calendar years 2017-present. In general inspections of the CAA are conducted weekly. The tank inspection checklist includes the secondary containment system, valves, signs of leaks, signs of damage, and tank labels. The container inspection checklist includes labels, sealed / closed, clean drums, aisle space, and emergency response kit. No inspections were conducted between 06/26/2017 and 07/10/2017, or during the first two weeks of May, the last week of October 2019, and the last two weeks of November 2019.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v)* [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator must, at least weekly, inspect CAAs.

Contingency Plan: The facility's contingency plan was last updated on 11/02/2018. The plan identifies and provides contact information for the emergency coordinator and one alternate. It includes a description of actions to take in the event of a fire or explosion, of a release of spilled materials, and of the liberation of cyanide gas. The plan includes the location and description of available emergency response equipment, and a specific list of fire extinguishers and eyewash locations. The plan describes procedures to follow in the event of an evacuation, and an area map of the facility's location. An evacuation map was posted in several areas around the facility, but it was not included in the contingency plan. The facility did not provide documentation that attempts had been made to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals.

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.

Hazardous Waste Training Records: According to the facility's RCRA hazardous waste training records, Mr. Davis and Mr. Herron both received annual RCRA hazardous waste training in July 2019. However, no written job title and description or written description of the type and amount of both introductory and continuing training was available for each position at the facility related to hazardous waste management.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv)(A) – (C)* [40 C.F.R. § 262.17(a)(7)(iv)(A)-(C)], which is a condition of the LQG Permit Exemption, a 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; and a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position.

11) Out-Briefing

The inspectors conducted an exit meeting with Mr. Davis and Mr. Herron. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

12) Conclusion

Based on the observations made during the inspection, Possehl Connector Services appeared to be deficient with the following requirements:

- 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 any 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) 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 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)(ii)* [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 containers with an indication of the hazards of the contents.
- 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)(1)(v)* [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator must, at least weekly, inspect CAAs.
- 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 with the words “Hazardous Waste;” with an indication of the hazards of the contents; and with the date upon which each period of accumulation begins clearly visible for inspection on each container.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(5)(ii)(B)* [40 C.F.R. § 262.17(a)(5)(ii)(B)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label tanks with an indication of the hazards of the contents.
- 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)(7)(iv)(A) – (C)* [40 C.F.R. § 262.17(a)(7)(iv)(A)-(C)], which is a condition of the LQG Permit Exemption, a 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; and a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(1) and (2) [40 C.F.R. § 262.42(a)(1) and (2)], an LQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the

initial transporter.

- Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste 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. 61-79.273.15(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.

13) **Signed**

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

Date

Concurrence

Parvez Mallick
Acting Chief
Land, Asbestos and Lead Section

Date



Photo 1: Cubic yard box labeled hazardous waste solid (lead) contaminated filters, PPE, brooms, and floor sweepings on the bottom right shelf of the large metal shelving system in the chemical storage area.



Photo 2: Red flip-top trash can in SAA located on the wall to the right in the chemical storage area outside the laboratory door.



Photo 3: Two filter draining units located between the large metal shelving units in the chemical storage area.



Photo 4: Two filter draining units located between the large metal shelving units in the chemical storage area.



Photo 5: Lid of filter unit to drain filters from the nickel, tin and lead plating lines.



Photo 6: Lid of filter unit to drain filters from the gold plating lines.



Photo 7: 300-gallon tote labeled F009 / D003 hazardous waste cyanide solution (potassium cyanide) on the middle shelf of the large metal shelving system to the left of the draining units.



Photo 8: Collection system and sump in the corner of the chemical storage area room used to transfer liquid hazardous waste from this area into the outdoor hazardous waste storage tank.



Photo 9: Strainer basin built into the lid of the collection system and sump in the corner of the chemical storage area.



Photo 10: Hole built into the lid of the collection system and sump in the corner of the chemical storage area so that the pumping wand can be placed into the unit.



Photo 11: One of two 500-gallon storage tanks for managing hazardous waste liquids that contain precious metals inside the chemical storage area.



Photo 12: Two portable secondary containment pallets holding ten 55-gallon drums on the floor toward the center of the chemical storage area room.



Photo 13: Drum of drained filters from the gold plating line labeled F007 hazardous waste toxic solid inorganic (potassium cyanide) and identified with a toxic hazard placard. The drum was marked with an accumulation start date of 01/23/2020.



Photo 14: SAA located just inside the door near the wall on the far left of the chemical storage area room.



Photo 15: 5-gallon container at the SAA located just inside the door near the wall on the far left of the chemical storage area room.



Photo 16: 5,000-gallon hazardous waste storage tank in an area just outside the bay door of the shipping and storage room.



Photo 17: Three 5-gallon pails of universal hazardous waste at the bottom of a shelving unit in the shipping and storage area.



Photo 18: Containers of universal waste lamps at the bottom of a shelving unit in the shipping and storage area.



Photo 19: SAA inside the process chemical storage area for accumulating used PPE, absorbents and other solid hazardous wastes.