



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

JAN 16 2020

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Mike Senn  
Safety & Environmental Manager  
Valmont Composite Structures  
19845 US Hwy 76  
Newberry, South Carolina 29108

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)  
Valmont Composite Structures  
EPA ID# SCD006540983

Dear Mr. Senn:

On December 5, 2019, the U.S. Environmental Protection Agency (EPA), along with the South Carolina Department of Health and Environmental Control (SC DHEC), conducted a RCRA CEI at the Valmont Composite Structures' facility, located at 19845 US Hwy 76, Newberry, South Carolina in order to determine its compliance status with RCRA and applicable SC DHEC regulations.

Enclosed is the EPA RCRA inspection report that indicates deficiencies of RCRA were discovered. A copy of this report has been forwarded to SC DHEC for follow-up and further review.

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](mailto:benton-digaetano.laurie@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Alan A. Annicella", is positioned above the typed name.

Alan A. Annicella  
Chief  
Land, Asbestos and Lead Section  
Chemical Safety and Land Enforcement Branch

Enclosure

cc: Tom Richmond, SC DHEC

## **RCRA Inspection Report**

### **1) Inspector and Author of Report**

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

### **2) Facility Information**

Valmont Composite Structures EPA ID# SCD006540983  
19845 US Hwy 76  
Newberry, South Carolina 29108

### **3) Responsible Officials**

Mr. Mike Senn, Safety & Environmental Manager  
Valmont Composite Structures

### **4) Inspection Participants**

Mike Senn, Valmont Composite Chris Corley, SC DHEC  
Laurie Benton DiGaetano, USEPA Tom Richmond, SC DHEC

### **5) Date of Inspection**

December 5, 2019

### **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<sup>1</sup>, 273, 278, & 279; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

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<sup>1</sup> 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 Valmont Composite Structures' compliance with the applicable requirements of RCRA and the corresponding SC DHEC regulations. This was an EPA lead inspection.

8) **Facility Description**

Valmont Composite Structures (Valmont) manufactures composite light poles and cross arms for highway, streetscape, and utility applications at the subject facility in Newberry, South Carolina. Manufacturing operations are housed in two buildings on the fourteen-acre facility. Light poles ranging in size from 15-feet to 150-feet are manufactured using fiberglass winding operations in the Light Pole Building. Other products, such as sea walls, interstate sound walls, crossarms, porch columns, and golf flagsticks, are manufactured using fiberglass protrusion operations in the Main Building. In both processes, products are constructed by pulling strands of glass through a liquid resin bath. In the winding process, saturated glass is wrapped around a metal light pole base to create the desired thickness and shape of the final product. In the protrusion process, a continuous piece of fiberglass composite is formed by pulling the saturated glass through a molding template. The continuous piece is then cut and further processed to create the final product. Further processing may include grinding or sanding, cleaning and painting, drilling and assembly, or filling with foam. Valmont has approximately 225 employees at this location. Although some of the operations run 24 hours per day, seven days per week, most run during two work shifts, five days per week.

Valmont Industries acquired Shakespeare Composite Structures and the subject facility in late 2014. Valmont Composite Structures Newberry first notified as a large quantity generator (LQG) of hazardous waste at this location on October 22, 2014. Prior to that, Shakespeare Composite Structures owned and operated the facility as an LQG under the NAICS codes 326199 for All Other Plastics Product Manufacturing and 335129 for Other Lighting Equipment Manufacturing for over twenty years. Valmont continues to operate the facility as an LQG under the NAICS codes 326199 and 335129.

The most recent Biennial Report, dated January 1, 2017, indicates that the facility generates F003 hazardous waste dirty acetone, D001 / F003 / F005 hazardous waste toluene solution, D001 hazardous waste flammable liquid (polyester resins), D001 hazardous waste paint related materials, D001 / D035 / F005 hazardous waste flammable liquid, D001 / F003 hazardous waste flammable solid acetone rags, and D039 hazardous waste flammable aerosols. The biennial report documented that, during calendar year 2016, the facility shipped 59,320 pounds of dirty acetone, 60,200 pounds of waste toluene solution, 5,050 pounds of waste polyester resins, 4,134 pounds of waste paint related materials, 22,400 pounds of waste flammable liquid, 4,750 pounds of waste acetone rags, and 100 pounds of waste aerosols off-site. These hazardous wastes were sent to Tradebe

Treatment and Recycling (IND000646943), Ohio Reclamation and Waste Services (OHD001926740), Tradebe Treatment and Recycling of Tennessee (TND000772186), or EQ Detroit (MID980991566).

9) **Previous Inspection History**

Since 2006, SC DHEC has conducted three RCRA CEIs at the subject facility, and found one or more violations during each of those inspections. SC DHEC's most recent RCRA CEI was conducted on November 7, 2014. SC DHEC issued a warning letter to Valmont Composite Structures for two apparent violations observed during that inspection, and later verified that the facility had returned to compliance on December 16, 2014.

10) **Findings**

On December 5, 2019, EPA inspector Laurie Benton DiGaetano, accompanied by SC DHEC inspectors Tom Richmond and Chris Corley, arrived at Valmont Composite Structures (Valmont) at approximately 9:30 a.m. Mr. Mike Senn, Safety & Environmental Manager, immediately received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. Mr. Senn provided information regarding the general facility operations and procedures, and then led the inspectors on a tour of the Facility.

**Main Building - Mixing Room:** Liquid resin is pumped from the outside storage tanks directly into the Mixing Room where employees mix it in a 55-gallon drum with a catalyst and other additives. The prepared liquid resin is then brought to the process line and transferred into the bath reservoir. Wastes may occur as the result of a spill or a bad batch, but they are not routinely generated in the Mixing Room. As a result, the Mixing Room does not have a designated satellite accumulation area (SAA).

**Main Building - Shakespeare Protrusion Line:** The inspection participants observed an active production line in the Shakespeare Protrusion Area. Spools of glass are stored at the start of each production line, and two hundred strands of glass are pulled from the spools and through the bath reservoir, where they are saturated with liquid resin. The saturated glass is then wrapped with layers of fiberglass as it is pulled through a molding template. The molding template causes the materials to form a continuous piece in the desired product shape. As the piece continues down the process line, it passes through a dye applicator unit where it is sprayed with dye and heated to cure the resin. The cured piece is cooled and pulled to the specified tensile strength as it continues down the process line. Finally, the production piece is cut to length and prepared for further processing.

Due to the nature of these production lines, each unit runs non-stop for the entire production cycle once it is set into motion. At the end of the cycle, the glass strands are lifted out of the resin bath but continue to feed the production line until the residual

uncured resin is no longer in contact with any part of the process unit. This is done in order to prevent the resin from hardening on the process unit and obstructing the line when resuming operations. According to Mr. Senn, it takes employees approximately eight hours to clean the process line during shut-down. Cleaning operations include changing water out of the dust collector and cleaning the resin reservoir vats and process lines with acetone and rags. Mr. Senn estimated that it takes employees another six hours to re-start a line after cleaning it.

Valmont manages a SAA for accumulating waste acetone used during cleaning operations at the Shakespeare Protrusion Line (Photo 1). The inspectors observed one 55-gallon drum in this SAA, which was located just outside the door to the Mixing Room. The drum was equipped with a latched funnel lid, and it was situated on a portable secondary containment unit. The drum was labeled D001 / D035 / F003 / F005 hazardous waste acetone (acetone / MEK), and it was identified with a flammable liquid hazard placard. Mr. Senn estimated that this drum is filled and replaced about twice each month.

Valmont manages another SAA for accumulating used rags generated at the Shakespeare Protrusion Line (Photo 2). The inspectors observed one 55-gallon drum in this SAA, which was located along the wall opposite the Mixing Room. The drum was equipped with a latched, flip-top lid. It was labeled D001 / D035 / F003 / F005 hazardous waste flammable solids (acetone / MEK), and it was identified with a flammable solid hazard placard.

Along the wall in the Shakespeare Area opposite the Mixing Room, the inspectors observed two 55-gallon drums on secondary containment pallet (Photo 3). One drum was labeled recycled acetone, and the other was labeled hazardous waste (acetone / MEK) and identified with a flammable liquid hazard placard. Mr. Senn explained that these drums have been re-used on-site and that they contain clean acetone for use in cleaning the production lines.

Main Building - Carsonite Line: Valmont operates a parts washer unit in a corner near the Mixing Room for washing Carsonite Line parts during shut-down and change-out events. Inspectors observed both a new parts-washing unit (Photo 4) and an old parts-washing unit (Photo 5) in this area. Mr. Senn explained that the old parts-washing unit uses acetone, and that the new parts-washing unit was purchased in an effort to reduce the use of acetone on-site. The new parts-washing unit uses a biogenic cleaning solution, which is heated during use. He stated that the old parts-washing unit was in use during the inspection, because the new unit was under repair.

Valmont manages a SAA for accumulating used rags generated at the Carsonite Line. The inspectors observed one 55-gallon drum in this SAA, which was located in the corner near the parts-washing units (Photo 4). The drum was equipped with a latched, flip-top lid. It was labeled D001 / D035 / F003 / F005 hazardous waste flammable solids organics (acetone / MEK), and it was identified with a flammable solids hazard placard.

**Powder Coating Line:** According to Mr. Senn, Valmont began use of the new powder coating line in June or July of 2019. Using this production line, powder coat is applied to each production piece with an electrostatic spray gun applicator and the piece is heat cured to harden the finish. No hazardous waste was generated in the powder coating production line at the time of the inspection.

**Grinding Machine:** Many of Valmont's production pieces must be processed in the grinding machine to create a tapered length or smooth edges. Grinding dust generated in this process is wet down with water and routed through floor drains and channels to the LRB (large red box) room. According to Mr. Senn, floor drains in other production areas have been sealed off over the years, and the only active drains on-site now lead to one of three LRB rooms.

**LRB Room – Outside Main Building:** The inspectors visited the LRB Room located just outside of the Main Building. The facility also manages two similar LRB Rooms for the Light Building. Water from the grinding machines is routed to a series of four settling tanks within the LRB room. Grinding dust captured by the water settles out as a non-hazardous waste sludge in these settling tanks, and the water is pumped out for re-use on-site. Sludge is pumped from the settling tanks into the roll-off container (the “large red box”) once each week. While the roll-off is accumulating sludge on-site, the drain valve is left open to allow liquid to flow back into the settling tanks. The full roll-off is shipped off-site about once every six weeks.

**Main Building – Manual Paint Area:** Valmont manages one SAA for accumulating used rags generated in the manual painting and paint booth areas (Photo 6). The inspectors observed one 55-gallon drum in this SAA, which was located just outside the manual paint area. The drum was equipped with a flip-top lid, with a broken latch. The latch on the lid was not capable of making contact to securely close the lid. The drum was labeled D001 / D035 / F003 / F005 hazardous waste flammable solids (acetone / MEK), and it was identified with a flammable solid hazard placard. The inspection participants returned to this area later during the inspection and observed that the lid had been replaced with one with a working latch, which was secured.

**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.**

Valmont manages another SAA for accumulating waste paint related material generated during gun cleaning and line flushing activities performed during color changes or at the end of the day (Photo 7). The inspectors observed one 55-gallon drum in this SAA, which was located on a portable secondary containment unit just outside the paint booth. The drum was equipped with a latched funnel lid. It was labeled D001 / F003 / F005 hazardous waste paint related material (toluene / acetone), dated 12/05/2019, and identified with a flammable liquid hazard placard. According to Mr. Senn, some of the paints formerly used in these areas contained toluene, but Valmont no longer uses those paints at this facility. Mr. Senn stated that the manual painting and the paint booth operations currently use only acetone for cleaning, and that the filters are disposed of as non-hazardous waste.

**Main Building - Shipping Area:** The inspection participants visited Valmont’s shipping area, but no hazardous waste is generated in this area.

**Main Building - Cross Arm Assembly Area:** Finishing operations observed in the Cross Arm Assembly area include filling production pieces with foam and curing the foam, drilling holes in production pieces and assembling parts together. No hazardous wastes are generated in these finishing operations.

**Main Building - Maintenance:** Valmont manages one SAA for accumulating used aerosol cans generated at the facility (Photo 8). The inspectors observed one 55-gallon drum in this SAA, which was located just inside the Maintenance Area. The drum was equipped with a latched flip-top lid. It was labeled D001 / D035 hazardous waste aerosols, and it was identified with a flammable gas hazard placard. According to Mr. Senn, the facility generates approximately one 55-gallon drum of waste aerosols each year.

**Main Building - Dip Coat Room:** Valmont manages one SAA for accumulating waste paint related material generated in the Dip Coat Room and the Squeegee Coat area (Photo 9). The Dip Coat Room houses one 10 to 12-foot dip tank beneath the floor, and production pieces are coated with paint by dipping each piece into the tank. Hazardous waste paint related material is generated in this area during color changes and during

clean-up activities at the end of the day. The Squeegee Coat area is a tented area inside the building just outside of the Dip Coat Room.

The inspectors observed one 55-gallon drum in this SAA, which was located in an overpack secondary containment unit in the Shakespeare Area just outside the Dip Coat Room. The drum was equipped with a funnel lid, which Mr. Senn latched during the inspection. It was labeled D001 / F003 / F005 hazardous waste paint related material (toluene / acetone) and identified with a flammable liquid 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.**

Tank Farm: Valmont manages one SAA for accumulating waste resin generated from leaks and spills in the Tank Farm (Photos 10 and 11). Because the waste resin generated in this area will not come into contact with a catalyst, the resin will remain a flammable liquid and not react or solidify to become a non-hazardous waste. The inspectors observed one 55-gallon drum, one 2.5-gallon bucket and one 5-gallon bucket of spilled resin in this SAA. The drum was equipped with a flip-top lid, which Mr. Senn latched during the inspection, but neither bucket was equipped with a lid. None of the containers were labeled with the words “hazardous waste” or marked with an indication of the hazards of the 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)\* [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 the words “Hazardous Waste,” and with an indication of the hazards of the contents.**

On the way out of the Light Pole Building, the inspectors revisited this SAA, and observed that the 55-gallon drum had been labeled D001 hazardous waste flammable liquid and identified with a flammable liquid hazard placard (Photo 12). Employees were preparing to transfer the contents of the buckets into the 55-gallon drum.

**Light Pole Building – Winding Operation:** Light poles ranging in size from 15-feet to 150-feet are manufactured using fiberglass winding operations in the Light Pole Building. Light poles are constructed by pulling strands of glass through a liquid resin bath before winding the saturated glass around a metal light pole base to create the desired thickness and shape of the final product. The Light Pole Building houses ten production lines for manufacturing poles up to 25-feet long, two lines for manufacturing poles from 25 to 34-feet long, and two lines for manufacturing poles over 35-feet long. Mr. Senn stated that production in the Light Pole Building occurs 24-hours per day, seven days per week. During the winding process, some liquid resin drips from the pole onto a trough beneath the winding surface. The trough is lined with paper, and Mr. Senn explained that the resin has time to cure and harden before the end of the day. Cured resin (and paper contaminated with the cured resin) no longer exhibits the characteristic of ignitability, so it is shipped off-site as non-hazardous waste.

The inspectors observed five 8-foot used fluorescent lamps leaning up against the wall behind a cardboard box in this area (Photo 13).

**Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)\* [40 C.F.R. § 273.13(d)], a Small Quantity Handler of Universal Waste (SQHUW) must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.**

Valmont manages one SAA for accumulating used rags in the winding area (Photo 14). The inspectors observed one 55-gallon drum in this SAA, which was located along the wall near the door leading to the less-than 25-foot pole production lines. The drum was equipped with a spring-loaded lid. It was labeled D001 / D035 / F003/ F005 hazardous waste flammable solids (acetone / MEK), and it was identified with a flammable solid hazard placard.

Valmont manages another SAA for accumulating waste acetone in the winding area (Photo 15). The inspectors observed one 55-gallon drum in this SAA, which was located on a portable secondary containment unit along the wall. The drum was equipped with a latched funnel. It was labeled D001 / D035 / F003 / F005 hazardous waste acetone, and it was identified with a flammable liquid hazard placard. The inspectors observed a few used rags and PPE on the portable secondary containment pallet, and not in the designated SAA container. Mr. Senn picked up the used rags and PPE and placed them into the nearby used rags SAA container.

**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 the SAA Permit Exemption.

According to Mr. Senn, every pole manufactured in the Light Pole Building is wiped down with acetone before it is painted. Valmont manages a SAA for accumulating used rags generated during this process (Photo 16). The inspectors observed one 55-gallon drum in this SAA, which was located along the wall near the start of the painting area. The drum was equipped with a spring-loaded lid, but the lid was not making full contact with the top of the drum. The drum was labeled hazardous waste, and it was identified with a flammable solid 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.**

Valmont manages a SAA for accumulating spent MEK used to flush the lines in the paint booth (Photo 17). When flushing the lines, employees spray the spent MEK directly into a can, which is then emptied into the dedicated SAA container. The inspectors observed a portable secondary containment unit in this SAA, which was located along the wall near the start of the painting area. However, no containers were observed in this SAA during the inspection.

**Light Pole Building - Manual Paint Booth:** Valmont manages a SAA for accumulating waste paint related material generated in the Manual Paint Booth (Photo 18). The inspectors observed one 55-gallon drum in this SAA, which is located in the corner at the end of the Manual Painting Booth. The drum was equipped with a funnel, which Mr. Senn latched during the inspection. It was labeled D001 / F003 / F005 hazardous waste paint related material (toluene / acetone), and it was identified with a flammable liquid 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.**

Valmont manages another SAA for accumulating used rags generated in the Manual Painting Booth (Photo 19). The inspectors observed one 55-gallon drum in this SAA, which is located near the exit door at the end of the Manual Painting Booth. The drum was equipped with a spring-loaded lid. It was labeled D001 / D035 / F003 / F005 hazardous waste flammable solids (acetone / MEK), and it was identified with a flammable solid hazard placard.

**Central Accumulation Area (CAA):** Valmont's CAA is a covered concrete pad with metal walls and a chain-link gate. The inspectors observed a spill response kit and shovels in one corner of the structure, a fire extinguisher at the door, and signs reading "danger," "no smoking," and "hazardous waste storage area" on the wall just outside of the gate (Photo 20). Mr. Senn explained that the area is not equipped with an alarm activation or communication system, but that employees carry cell phones when working here.

On the left side inside the structure, inspectors observed one 55-gallon drum on a wooden pallet. The drum was labeled D001 / F003 / F005 hazardous waste paint related material (toluene / acetone); it was identified with flammable liquid hazard placard; and it was dated 12/04/2019 (Photo 21).

On the right side inside the structure, inspectors observed two wooden pallets holding six 55-gallon drums of hazardous waste (Photo 22). The labels on five of the drums were visible and identified the contents as D001 / D035 / F005 hazardous waste flammable liquids (waste MEK). The label on the sixth drum was facing inward toward the neighboring drum and could not be read. None of the drums were marked with an accumulation start date.

**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)\* [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 date upon which each period of accumulation begins clearly visible for inspection on each container.**

The inspectors observed another wooden pallet holding one 55-gallon drum of hazardous waste, and two wooden pallets holding smaller buckets of paint (Photo 23). The 55-gallon drum was labeled D001 / F003 / F005 hazardous waste paint related material (toluene / acetone); it was identified with a flammable liquid hazard placard; and it was dated 12/03/2019. According to Mr. Senn, the paint buckets were brought here from the product inventory area, but he was not certain if the materials had been removed from the inventory system. Mr. Senn explained that Valmont will make a hazardous waste determination on the containers as they are taken out of the inventory system.

Finally, the inspectors observed one 55-gallon drum and two 5-gallon can liners on a wooden pallet beside the wall opposite the entry gate (Photo 24). The drum was equipped with a latched flip-top lid. It was labeled D001 hazardous waste flammable liquid resin, and it was identified with a flammable liquid hazard placard (Photo 25). The drum was not marked with an accumulation start date. The 5-gallon can liners held what appeared to be solidified glue. Mr. Senn explained that Valmont is managing this area as a SAA for accumulating epoxy / glue resin generated in two areas of the plant. The epoxy / glue resin is a two-part glue that hardens and solidifies when the parts come together within the appropriate ratio range. If the ratio is not within this range, the glue remains a liquid, which exhibits the characteristic of ignitability. The hardened glue does not exhibit the characteristic of ignitability. Mr. Senn explained that the waste glue is transferred to this area in a bucket, and that it is accumulated here because the facility generates approximately one 55-gallon drum over the course of a calendar year. Because this 55-gallon drum is not located at or near the point where the hazardous waste epoxy / glue resin is generated, it cannot be managed as a SAA container. Instead, this drum should be managed as a hazardous waste storage drum.

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

Outbuilding: Valmont manages used electronics, ballasts, universal waste in a small outbuilding at the facility (Photo 26 and 27). The inspectors observed seventeen boxes of used fluorescent lamps and one used 8-foot lamp leaning against the wall in this area during the inspection. The boxes all appeared to be labeled universal waste bulbs. Five of the boxes were not securely closed, and two were not marked with an accumulation start date. The inspectors also observed crushed and punctured boxes caused by the weight and corners of used electronics that were stacked on top of the boxes.

**Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.13(d)\* [40 C.F.R. § 273.13(d)], a Small Quantity Handler of Universal Waste (SQHUW) must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.**

Epoxy Glue Station: The inspectors observed one of two epoxy glue stations at the facility (Photo 28). Each epoxy glue station is equipped with a container for accumulating waste drips from the dispensing taps and occasional excess generated during change-out events. Mr. Senn explained that the epoxy / glue resin is a two-part glue that typically hardens and solidifies to be disposed of as non-hazardous waste. However, if the parts do not come together within the appropriate ratio range (typically 65 / 45), the glue remains a liquid, which exhibits the characteristic of ignitability. When this happens, the waste glue is transferred from this area to a 55-gallon drum in the CAA. However, when the liquid waste epoxy / glue is generated and accumulated in this area, it should be managed as a hazardous waste.

**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 the SAA Permit Exemption.**

Hazardous Waste Manifests: The inspectors reviewed hazardous waste manifests for shipments of waste sent from this facility during calendar years 2017-2019. Records showed that, during 2019, Valmont sent four shipments of D001 hazardous waste flammable liquid to EQ Detroit (MID980991566); and eight shipments of D001 / F003 / F005 waste paint related material (acetone / toluene) antenna pole paint, D001 / D035 / F003 / F005 waste acetone (acetone / MEK) waste acetone, D001 / D035 / F003 / F005 waste flammable solids (acetone / MEK) solvent rags, and D001 / D035 / F005 waste flammable liquids (MEK) MEK to Tradebe (IND000646943). Three of the shipments to Tradebe also included D001 / F003 / F005 waste paint related (xylene / toluene) paint cans. With the exception of the most recent hazardous waste manifest, the hazardous waste manifests were all accompanied by return copies from the destination facility. The associated land disposal restriction forms were also included. However, the returned copy of hazardous waste manifest number 013149241FLE did not include the handwritten signature of the owner or operator of Tradebe (IND000646943), the designated destination facility.

**Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a) and (b) [40 C.F.R. § 262.42(a) and (b)], a LQG generator 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; 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; and must submit a legible copy of the manifest, with some indication that the generator has not received confirmation of delivery, 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 60 days of the date the waste was accepted by the initial transporter.

Contingency Plan: Valmont's most recent Contingency Plan for the subject facility was dated 09/06/2019. Mr. Senn explained that the contingency plan was hand-delivered to members of the emergency response community (three local fire departments, the emergency medical services, and the police department) during an annual tour of the facility. The plan describes emergency alarms and evacuation procedures for the facility. It describes actions to take in the event of severe weather, a natural disaster, a fire, bomb threat, or terrorist activity, or in response to flood or water damage. It includes a list of the available emergency equipment (PPE, first aid, fire extinguisher, spill response, two-way radios, and flashlights). However, the plan does not describe the capabilities and location of this equipment. According to Mr. Senn, the facility's Tier 2 Plan includes a map locating the SAAs and CAA at the facility, but it is not included with the contingency plan. The inspectors also reviewed the available evacuation map for the facility. Although the plan was last updated in September 2019, it 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. 61-79.262.262(b) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a LQG that is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders. The quick reference guide must include the following elements: (1) the types / names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; (2) the estimated maximum amount of each hazardous waste that may be present at any one time; (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) a street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) the locations of water supply; (7) the

**identification of on-site notification systems; and (8) the name of the emergency coordinator(s) and 24/7-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number of the emergency coordinator.**

Hazardous Waste Training: According to the facility's hazardous waste training records, the two employees responsible for maintaining the hazardous waste management program received hazardous waste training on May 21 and 22, 2019. All other employees received job-specific hazardous waste training on 11/12/2019 and 11/19/2019. The provided job description included the requisite skill, education, and other qualifications, and duties of facility personnel assigned to the position, but it did not include a written description of the type and amount of both introductory and continuing training that will be given to each person filling the position.

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

Weekly Inspections: The inspectors reviewed available records for hazardous waste inspections conducted between 06/29/2018 and 11/29/2019. The records indicate that inspections are conducted at least weekly. Each inspection record includes the name of the inspector, the date and time of the inspection, and the signature of the manager reviewing the form.

The inspection log is broken down into four sections: the containment system, the external grounds, the hazardous materials handling, and inventory control of hazardous and regulated waste. The containment system portion of the log includes space for inspectors to record observations of spills, closed and locked rainwater discharge valves, piping leaks for raw materials or drainage systems, condition of containment walls and floors, and the absence of spills at the below ground holding tanks. The external grounds portion of the log includes space for inspectors to record observations of external spills, the condition of storm-drain entry points, evidence of sinking ground sinking to indicate a leaking buried pipe, and open or uncovered external storage containers. The hazardous materials handling portion of the log includes space for inspectors to record observations of materials found outside the HazMat Shed or satellite areas, condition of general housekeeping, covers and labels on Haz Mat containers, accumulation start date on HazMat containers in the shed, and available spill containment for containers. Under the inventory control section for hazardous and regulated waste, the log includes a space to record the number of containers of acetone rags, drums of acetone, drums of Sherwin Williams paint, quantity of MEK, drums of polyester resin, drums of oil, drums of still bottoms, drums of resin / sand, and drums of mold release.

**11) Out-Briefing**

The inspectors conducted the exit meeting at with Mr. Senn. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

**12) Conclusion**

Based on the observations made during the inspection, Valmont was in apparent violation with the following requirements:

- **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 the SAA Permit Exemption.**
- **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.**
- **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 containers with the words "Hazardous Waste," and with an indication of the hazards of the contents.**
- **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 date upon which each period of accumulation begins clearly visible for inspection on each container.**
- **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, a LQG that**

is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders. The quick reference guide must include the following elements: (1) the types / names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; (2) the estimated maximum amount of each hazardous waste that may be present at any one time; (3) the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) a street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) the locations of water supply; (7) the identification of on-site notification systems; and (8) the name of the emergency coordinator(s) and 24/7-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number of the emergency coordinator.

- 25 S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv)(C)\* [40 C.F.R. § 262.17(a)(7)(iv)(C)], which is a condition of the LQG Permit Exemption, a LQG must maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management.
- 25 S.C. Code Ann. Regs. 61-79.262.42(a) and (b) [40 C.F.R. § 262.42(a) and (b)], a LQG generator 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; 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; and must submit a legible copy of the manifest, with some indication that the generator has not received confirmation of delivery, 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 60 days of the date the waste was accepted by the initial transporter.
- 25 S.C. Code Ann. Regs. 61-79.273.13(d)\* [40 C.F.R. § 273.13(d)], a Small Quantity Handler of Universal Waste (SQHUW) must manage universal waste lamps in a way that prevents releases of any universal waste or

component of a universal waste to the environment.

13) **Signed**

*for*   
Laurie Benton DiGaetano  
Senior Enforcement and Compliance Specialist

1/15/2020  
Date

**Concurrence**

  
Alan A. Annicella  
Chief, Land, Asbestos and Lead Section  
Chemical Safety and Land Enforcement Branch  
Enforcement and Compliance Assurance Division

1/15/2020  
Date





**Photo 1:** SAA located just outside the Mixing Room for accumulating waste acetone used in cleaning protrusion machines in the Shakespeare area.



**Photo 2:** SAA for accumulating solvent contaminated rags used in cleaning protrusion machines in the Shakespeare area.



**Photo 3:** Two 55-gallon drums on portable secondary containment in the Shakespeare area. Although one drum is labeled as recycled acetone, the other is labeled as hazardous waste flammable liquid containing acetone and MEK. Mr. Senn stated that the drums have been reused, but that the labels were not removed. He stated that these drums both contain clean acetone for use on-site.



**Photo 4:** New parts washing unit (black box with gray lid) on the left, and SAA in the corner for accumulating solvent contaminated rags used in cleaning protrusion machines in the Carsonite area.



**Photo 5:** Old acetone parts washer used to clean parts removed from the protrusion lines in the Carsonite area.



**Photo 6:** SAA for accumulating solvent contaminated rags used in the manual painting area within the Main Building.

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**Photo 7:** SAA for accumulating waste paint related material generated in the paint booth within the Main Building.

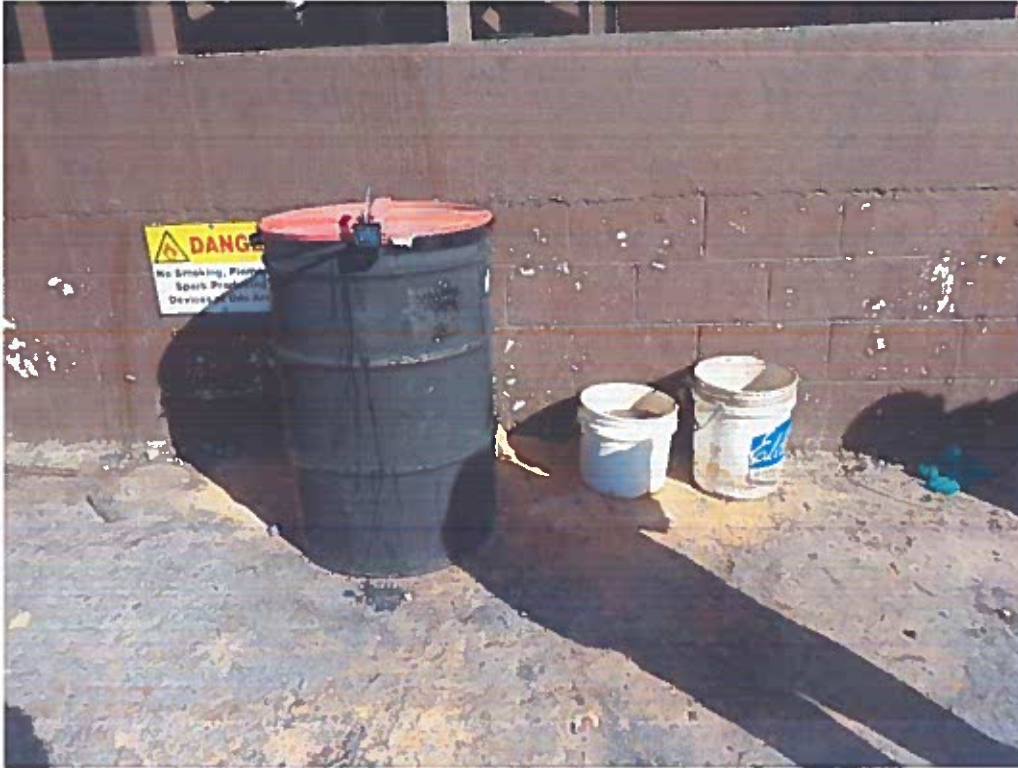


**Photo 8:** SAA in the Maintenance Area for accumulating used aerosol cans generated throughout the facility.

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RCRA CEI Photographs  
Laurie Benton DiGaetano, USEPA



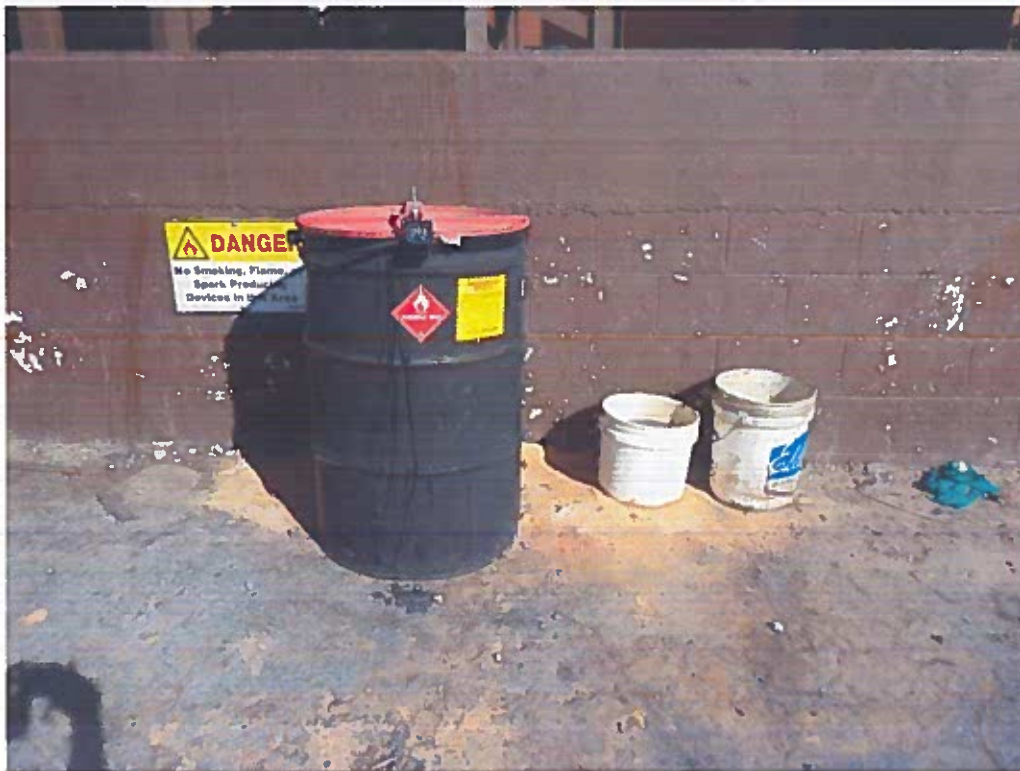
**Photo 9:** SAA for accumulating waste paint related material generated in the dip tank area.



**Photo 10:** SAA for accumulating drips and spills of resin generated in the resin tank loading/unloading area. The SAA contained one 55-gallon drum, one 5-gallon bucket and one 2.5-gallon bucket. None of the containers were labeled, and the buckets did not have lids.



**Photo 11:** One 5-gallon bucket and one 2.5-gallon bucket located at the SAA for accumulating drips and spills of resin generated in the resin tank loading/unloading area. Neither bucket was closed or labeled.



**Photo 12:** SAA for accumulating drips and spills of resin generated in the resin tank loading/unloading area. Composite labeled the 55-gallon drum during the inspection, and employees were preparing to empty the contents of the buckets into the 55-gallon drum.



**Photo 13:** Used fluorescent lamps leaning against the wall behind a box of new lamps inside the Light Pole Building.



**Photo 14:** SAA for accumulating solvent contaminated rags used in the winding area within the Light Pole Building.



**Photo 15:** SAA for accumulating waste acetone generated in the winding area within the Light Pole Building.



**Photo 16:** SAA for accumulating solvent contaminated rags used in the painting area within the Light Pole Building.



**Photo 17:** SAA for accumulating waste MEK used to flush painting lines in the automated painting area within the Light Pole Building.



**Photo 18:** SAA for accumulating waste paint related material generated in the manual painting booths within the Light Pole Building.



**Photo 19:** SAA for accumulating solvent contaminated rags generated in the manual painting booths within the Light Pole Building.



**Photo 20:** Signs on the outside of the CAA building identifying the area as a hazardous waste storage area.



**Photo 21:** One 55-gallon drum of waste paint related material located within the CAA.



**Photo 22:** Six 55-gallon drums of hazardous waste flammable liquids containing MEK in the CAA.



**Photo 23:** One 55-gallon drum of hazardous waste paint related material containing toluene and acetone located behind a pallet of paint cans in the CAA. Mr. Senn stated that Valmont will make a hazardous waste determination on the contents of these containers, when the paint cans are removed from the facility inventory list. In the meantime, Valmont considers them to be product materials that are included on the inventory list.



**Photo 24:** 55-gallon drum containing drips and spills of epoxy glue generated at two epoxy glue mixing stations on-site.





**Photo 26:** Boxes of used fluorescent lamps in an outbuilding.



**Photo 27:** Boxes of used fluorescent lamps in an outbuilding.

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**Photo 28:** Point of generation for hazardous waste epoxy / glue at one of the on-site mixing stations.