

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

1) **Inspector and Author of Report**

Héctor M. Danois
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
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2) **Facility Information**

Schick Manufacturing, Inc.
2820 Media Drive
Knoxville, Tennessee 37914-6444

EPA ID No.: TNR000001412

NAICS: 332215 - Metal Kitchen Cookware, Utensil, Cutlery, and Flatware (Except Precious)
Manufacturing

3) **Primary Contact**

Robert T. Brown, Environmental Health & Safety Supervisor
Edgewell Personal Care/Schick Manufacturing, Inc.
2820 Media Drive
Knoxville, Tennessee 37914-6444

4) **Inspection Participants**

Robert T. Brown	Schick Manufacturing, Inc.
Jeff Dolak	Schick Manufacturing, Inc.
Darrell McKinney	Schick Manufacturing, Inc.
Scott Rollins	Schick Manufacturing, Inc.
Todd Stooksbury	Schick Manufacturing, Inc.
Ryan Bentley	Schick Manufacturing, Inc.
Gerald M. Webster	Knoxville TDEC
Héctor M. Danois	EPA Region 4

5) **Date and Time of Inspection**

August 25, 2020 @8:40 A.M.

6) **Applicable Regulations**

RCRA Sections 3005 and 3007; 40 Code of Federal Regulations (C.F.R.) Parts 260 - 266, 268, 270, 273, and 279; Tennessee Hazardous Waste Management Act, Tennessee Code Annotated (T.C.A.) 68-212 part 1 & 3 and the Used Oil Collection Act of 1993, T.C.A. 68-21; the Tennessee Hazardous Waste Management Regulations, Tennessee Rule Chapter 0400-12-01.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e) [40 C.F.R. § 262.34(d)], a generator of greater than 100 kilograms but less than 1,000 kilograms of hazardous waste in a calendar month is a Small Quantity Generator (SQG) and may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e) 6(i)-(v) [40 C.F.R. § 262.34(d)(1)-(5)] (hereinafter referred to as the “SQG Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)5(i) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)2(iv) [40 C.F.R. § 262.34(a)], provided that the generator complies with the satellite accumulation area conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)5(i)I [40 C.F.R. § 262.34(c)(1)(i)-(ii)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(1)(b) [40 C.F.R. § 273.9 (2016)], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

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

7) **Purpose of Inspection**

This announced compliance evaluation inspection (CEI) was conducted to evaluate the facility’s compliance with applicable requirements of RCRA and corresponding Tennessee Department of Environment and Conservation (TDEC) regulations.

8) **Facility Description**

Schick Manufacturing, Inc. (hereinafter as “Schick” or the “facility”) is a commercial manufacturer of generic razor cartridge heads and disposal razors. Schick produces approximately 8 million blades per day. Final assembly is conducted at other Edgewell Personal Care facilities.

Edgewell Personal Care owns the facility and has been in operation since 2011 at this 11-acre site. There are approximately 157 employees at Schick operating on 4 shifts. The plant operates 24 hours a day, seven days a week.

Schick's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 25, 2019, characterized the facility as a small quantity generator (SQG) of hazardous waste.

Currently, Schick can generate hazardous waste streams, used oil and universal wastes (such as spent batteries, certain types of lamps and mercury-containing devices or equipment), waste solvent, spent aerosol cans, paint waste, and other wastes which include hazardous waste designated with the EPA Waste Codes D001, D006, D007, D040, F001, and/or F003.

9) Previous Inspection History

On November 15, 2018, TDEC conducted a RCRA CEI at the facility and no RCRA deficiencies were discovered.

10) Opening Conference

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| ☒ Credentials Presented | ☒ CBI warning to facility provided |
| ☐ SBREFA fact sheet, if applicable | ☐ CBI was provided or discussed during the inspection |
| ☒ Health and Safety, Personal Protective Equipment discussion | ☐ Additional equipment that will be used, if applicable (FLIR camera, PID, FID) |

On August 25, 2020, the U.S. Environmental Protection Agency, Region 4 inspector Héctor Danois, accompanied by Gerald Webster, TDEC inspector, arrived at 8:40 A.M. to inspect the facility to determine its compliance status with both RCRA and the State of Tennessee hazardous waste regulations. Schick was represented by Mr. Brown, Mr. Dolak, Mr. McKinney, Mr. Bently, and Mr. Stooksbury. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit, and a description of the facility's process was discussed.

11) Findings

A brief explanation for the purpose of the inspection was given, as well as an introduction of the TDEC and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the inspection.

Pre-Grind

The facility receives the coiled stainless-steel metal from Sweden. The stainless-steel strip is loaded onto a de-coiler and fed into a series of punch presses and punched in the pre-determined part of the strip. Then the strips are re-coiled before moving to the next step of the process. Scrap metal is reclaimed and recycled. No RCRA waste was generated during the inspection.

Heat Treatment

This is the area where the steel strip is cleaned (to remove oil) using hot de-ionized water in a process tank. The strip is then heated in a hydrogen/nitrogen furnace, cooled, and quenched in a cryogenics treatment using liquid nitrogen to temper the metal. At the time of the inspection, the area was storing a 5-gallon container of contaminated rags and a 55-gallon drum of used oil rags (sent to laundered). The containers were closed and labeled.

O3D Room

Used oil is reclaimed for onsite reuse using a two-chamber tank system (dirty side and clean side). The used oil passes through filtering socks on the dirty side. Filtered oil is then moved to the clean side to be used in the grinding system. Grinder swarf (cellulose fiber oil adsorbent/contaminants) generated in the dirty side is removed, collected in 55-gallon drums, and sent to recycling.

Hazardous Waste Storage Area (HWSA)

Hazardous waste generated around the facility is stored at the HWSA. The 180-days storage area is in the O3D Room. At the time of the inspection, the area was storing three 55-gallon drums of oily rags and a 55-gallon drum of used oil. The drums were closed and labeled.

Grinder Area

This is the area where the steel strip is de-coiled and pass-thru grinding machines. The steel strip is oiled, lubricated, and ground using ceramic wheels at different angles. The used oil is collected and sent to the used-oil filtration tank located in the O3D Room. At the time of the inspection, the area was storing a 55-gallon SAA drum containing alcohol rags. The drum was closed and labeled.

Cleaning/Degreasing Area

Sharpened steel strips are individually cleaned in a two-stage cleaning vacuum/ultrasonic system. The blades are placed in trays and sent through an alcohol-based cleaning system. No hazardous waste is generated in this area.

Vacuum Coating Machine

A layer of chrome, titanium, and Teflon is applied to the edge of the blades. A plasma cloud system is used to add the chrome to the blades. Then, the facility preheats the blades, and a mixture of PTFE (Teflon), and water are applied to the blades. The water evaporates leaving the Teflon coating in place. In a vacuum system, the facility adds a rust preventer.

Premium Blades

This is the area where Schick manufactures its premium blade line. This is an automated process that welds a small strip spacer to the blades. At the time of the inspection, the area was storing a 55-gallon SAA drum of alcohol rags. The drums were closed and labeled.

Maintenance Shop

The Maintenance Shop provides maintenance of equipment around the facility. At the time of the inspection, the area was storing a 30-gallon SAA container (can punctured) of paint waste and a container of scrap metal (empty cans). The SAA was closed and labeled. In addition, the area was storing 3-gallon bucket of alkaline batteries.

Universal Waste Storage

This area of the facility is where universal waste is stored and was empty during the inspection.

Recordkeeping

Required and relevant paperwork were submitted digitally by the facility per request of the EPA and TDEC. The following documents were reviewed off site following the site inspection: weekly inspections (2018-2020), manifests (2018-2020), Annual Hazardous Waste Report (2019), Waste Minimization Plan Emergency, Preparedness /Prevention Contingency Plan (2019), and personnel hazardous waste management training documentation (2018-2019).

12) **Closing Conference**

The RCRA inspectors completed their inspection on August 25, 2020. Schick was inspected as an SQG. At the time of the inspection, the facility was operating as an SQG. On September 21, 2020, an out-briefing on the findings of the inspection was provided by Mr. Danois and Mr. Webster to the inspection participants.

13) **Signed**

Héctor M. Danois
Inspector and Author of Report

Date

14) **Concurrence and Approval**

Alan A. Annicella
Chief
Land, Asbestos and Lead Section

Date