

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/28/2022 – 4/01/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	The General Motors Company	
Facility Name:	General Motors NV Arlington Assembly	
Facility Physical Location:	2525 E. Abram St.	
(city, state, zip code)	Arlington, TX 76010	
Mailing address:	2525 E. Abram St.	
(city, state, zip code)	Arlington, TX 76010	
County/Parish:	Tarrant County	
Facility Phone Number	(817) 652-2452	
Facility Contact:	Trinette Moore	Environmental Engineer – Environmental Lead
	trinette.moore@gm.com	
FRS Number:	N/A	
Identification/Permit Number:	N/A	
Media Identifier Number:	RCRA ID: TXD008018004	
NAICS:	336112 – Light Truck and Utility Vehicle Manufacturing	
SIC:		
Personnel participating in inspection:		
John Penland	US EPA Region 6 (ECAD)	Senior Environmental Scientist (Lead Inspector)
Gabriel Salinas	US EPA Region 6 (ECAD)	Senior Environmental Scientist (Inspector)
Janeth Rodriguez	General Motors	Environmental Engineer
Trinette Moore	General Motors	Environmental Engineer
Chris Boehle	General Motors	Senior Environmental Engineer
EPA Lead Inspector Signature/Date	For John Penland:	
	John Penland – Senior Environmental Scientist	Date
Supervisor Signature/Date		
	Jeff Yurk – Waste Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of March 28, 2022, I, John Penland, conducted an unannounced inspection of the General Motors NV Arlington Assembly facility (GM Arlington) located at 2525 E. Abram St., Arlington, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector Gabriel Salinas. The inspection included a walkthrough of the facility's waste generation and management units, a review of the facility records related to hazardous waste management, and a specific evaluation of the facility's compliance with the RCRA air pollution control requirements.

The GM Arlington facility was targeted for inspection as part of Regional and National investigation initiatives to evaluate facilities subject to RCRA Subpart AA, BB, and CC regulations related to air emissions from hazardous waste management units.

We concluded the inspection of the GM Arlington facility on April 1, 2022, with a closing conference where we presented our provisional areas of concern.

This report serves as documentation of all onsite activities and observations during the inspection of the GM Arlington facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The GM Arlington Assembly facility is located on approximately 250 acres in an industrial area on the northeast side of Arlington, Texas. The plant structure contains approximately 5.7 million square feet of manufacturing and assembly area. Paved areas around the facility are used for parking, material handling, and materials storage. The primary activity at the GM Arlington facility is the production of light duty trucks for various General Motors, LLC brands. The facility employs approximately 4,500 employees on three shifts daily. Chemical management on site is handled under a contract with PPG Chemical Management. Management of waste is handled under a contract with an onsite waste management resource manager. A general map of the plant is included in Appendix 3.

The GM Arlington facility was issued the EPA ID# TXD008018004 and a Texas Solid Waste Registration Number 31347 with a last amendment date of 02/08/2022. The facility has notified and is registered as a Large Quantity Generator of hazardous waste under RCRA.

Section II – OBSERVATIONS

We conducted the onsite inspection during normal business hours from March 28 through April 1, 2022. During the inspection, the facility was conducting normal operations and all areas of the facility were in use. Throughout the week we visited each of the facility's waste generation, accumulation, and management areas. We also reviewed the facility's operating records pertaining to the facility's RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities. For details Appendix 2 contains the daily summaries provided to facility representatives. These summaries provide information on our observations each day, what was discussed at the end of each day with the facility representatives and any requests for documentation. Unless otherwise specified, the statements cited in this section, or in the daily summaries, reflect those claims made by facility personnel or documents reviewed during the inspection.

March 28, 2022

Gabriel Salinas and I began the opening conference at the facility at 13:40 hrs. where we presented our credentials to Ms. Moore and Mr. Boehle and informed them that we were there to conduct an inspection of the facility under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA). The goals of the inspection were to assess GM Arlington's compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting, waste marking/labeling, waste container management, use of hazardous waste manifests, emergency planning, personnel training, and air pollution control requirements for applicable hazardous waste units. I also informed them of GM Arlington's right to assert a Confidential Business Information (CBI) claim for records requested by EPA. During this opening conference, we also discussed the inspection process which would include facility site tours, records requests/reviews, and daily summaries.

Following the opening conference, we conducted a walkthrough of GM Arlington's Central Waste Accumulation Area (CWAA), Paint Mix Area, and Spent Solvent Tank.

Central Waste Accumulation Area (> 90-Day Storage)

At the Central Waste Accumulation Area (CWAA) we observed an open 55-gallon container used for the < 90-day accumulation of aerosol wastes. According to operators using the container, no waste had been added to the container for approximately 1 hour. Also observed in the CWAA were 2, 55-gallon containers of hazardous waste marked as oxidizers. These oxidizer wastes were stored in close proximity to other organic materials which may be incompatible. Continuing through the inspection, we noted one container of "flammable solids" marked as hazardous waste. This container was leaning off of the underlying container. I requested the facility's SOPs regarding container waste management to review the facility's container management guidelines. We also observed one container marked as hazardous waste with a label identifying its contents as a pesticide named Chemical Treatment CL215.

The label indicates that pesticide wastes may be acutely hazardous. A review of the GM Arlington waste generation records will help determine any applicable regulations for this waste.

Paint Mix Area

In the paint mix area, we observed a single 55-gallon drum of solvent-based paint waste. The container was closed, labeled, and in good condition.

Spent Solvent Tank/Waste Purge Thinner Hazardous Waste Tank (Notice of Registration Management Unit #2)

During the site tour, we observed the 12,000-gallon spent solvent tank, also known and marked as the Waste Purge Thinner Hazardous Waste Tank, used for the accumulation of spent solvent prior to off-site reclamation. The tank was marked with the words "Hazardous Waste". We climbed to the top of the tank and noted that the tank's manways and flanges appeared to be secured in the closed position. The spring-loaded pressure relief valve is marked to be set at a trigger pressure of 1 ounce per square inch. According to Ms. Moore, the spent solvent is not considered generated until it enters the waste tank. We requested correspondence or documentation to support this determination. The emissions regulations applicable to this tank and the associated ancillary equipment is to be determined.

Records Requested

Following the conclusion of the day's facility walkthrough, we discussed our records request. The request included:

- A current copy of the facility Contingency Plan and Emergency Procedures (may also be part of a broader Emergency Response Plan).
- Personnel training records related to hazardous waste activities for selected personnel.
- Facility maps that preferably identify the solid waste generation and management areas.
- Waste profiles for any solid waste generated since 2019. These waste profiles should include documentation relevant to the waste determination made for each waste (i.e., analytical reports or documentation to support generator knowledge). Also diagrams or waste generating processes, if available.
- Manifests and accompanying land disposal restriction notices for any hazardous waste shipped for off-site disposal since 2019.
- Bills of lading, or any other document, used to accompany any shipment of any waste since 2019.
- Any active RCRA or CAA permits that pertain to RCRA management units.
- Engineering diagrams for the waste generating processes and solvent reclamation systems.
- Any agreements between GM Arlington and any subsequent waste handler or treatment, storage or disposal facility pertaining to the management and disposition of GM Arlington's wastes.
- Standard Operating Procedures related to waste generating or management processes.
- Inspection records for hazardous waste management units.

- Correspondence regarding the point of generation for the spent solvents managed in the Spent Solvent Tank (NOR Unit #2).

March 29, 2022

Records Review

We reviewed a selection of Daily Tank Inspection and Weekly Waste Container Inspection reports. No concerns were noted during our review of these records. I requested that the facility provide training documentation for the employees completing these daily tank inspections. The documentation should be capable of demonstrating that these employees have been sufficiently trained to conduct this compliance related task as specified in 40 C.F.R. 262.17(a)(7)(i)(A).

Solvent Wipes Exclusion

I discussed with facility representatives the exemption containment standards that require a container closure to be sufficient to “prevent leaks and emissions” [40 CFR 261.4(b)(18)(i)]. We observed that GM manages solvent wipes in cubic yard bags with a plastic liner. The discussion included how GM demonstrates that this practice prevents leaks and emissions. The exemption requires that the generator have a written plan to exclude free liquids. We requested a copy of this written plan.

Painting Areas

During the walkthrough of the painting area, we were joined by facility representative Steve Jusko. According to Mr. Jusko, there are 4 spent solvent accumulation tanks for each of the 3 paint lines and 2 spent solvent accumulation tanks for the primer lines. This totals to 14 spent solvent accumulation tanks in the painting areas. This solvent is used to clean the spray guns used for the application of surface coatings within the facility’s automated spray booths. Mr. Jusko stated that the spent solvents are not returned to any process and once generated are accumulated in these 14 smaller spent solvent accumulation tanks, referred to as solvent recovery tanks, located adjacent to the spray paint operations. From these 14 spent solvent accumulation tanks, the spent solvents are pumped via hard piping to the large 12,000-gallon spent solvent tank (NOR #2). The piping used for this conveyance is double-walled except for a break in the piping made for a new secondary containment perimeter for the 12,000-gallon tank. The double walls in the piping ends when the piping enters the secondary containment perimeter of the 12,000-gallon spent solvent tank. The spent solvent is not used for its solvent properties in any new applications between its exit from the spray gun and its transport off-site.

During our walkthrough, we observed two 55-gallon containers used for the accumulation of hazardous waste flammable solids. Both containers were closed, labeled, and in good condition.

Requested Records Discussion

We reviewed a list of requested records with the facility representatives: a written facility description, contingency plans and emergency procedures, personnel training records, facility maps, facility waste profiles, any diagrams of waste generating profiles, manifests/bills of lading, active RCRA/CAA permits

that pertain to RCRA management units, any agreements between GM and any subsequent waste handler or TSDF (treatment, storage, or disposal facility), standard operating procedures related to waste generation or management processes, correspondence related to the point of generation for the spent solvents managed in the spent solvent tank (NOR #2), and the solvent wipes exemption written plan to exclude waste containing free-liquids for the solvent wastes.

March 30, 2022

2009 Consent Agreement Regarding GM Automotive – North America

We discussed with facility representatives the applicability of a 2009 Consent Agreement that GM Arlington references for their compliance with management of spent solvents from the painting operations to storage in the spent solvent tank. The 2009 Consent Agreement identifies specific GM facilities by EPA ID # as Respondents. Since the GM Arlington facility is not listed as a Respondent in this Consent Agreement, the terms of settlement do not apply to the Arlington facility. In addition, based on our review of the Consent Agreement, it does not address the point of generation arguments raised during this inspection, nor does the Order refute the position the EPA has taken in RCRA Online document #14604 and #14632. Therefore, the point of generation for the purge solvent will continue to be evaluated as the exit of the spray gun. The consequence of this determination is that the 14 solvent tanks in the painting process areas and their associated piping will be considered as hazardous waste management units subject to the requirements of 40 CFR Part 262. Additional consideration for these units is being made in light of the alternate management standards proposed in RO14632 and the exemptions to 40 CFR 265 Subpart BB provided by the facility's adherence to the requirements of 40 CFR Part 63 Subpart IIII.

Solvent Wipes Exemption

During the inspection, the solvent wipes exemption was re-visited in a discussion with facility representatives. We requested GM Arlington representatives provide any testing or other forms of demonstration that their standard operating procedures and methodology of storing solvent wipes are adequate to prevent air emissions from the solvent contaminated wipe containers.

e-Manifests

Our review of the e-Manifest system shows that GM Arlington has manifest records dating back to 2018. We requested facility representatives provide copies of any manifests not included in the e-Manifest system for EPA review.

Contingency Plan

The facility representatives submitted a copy of their current Contingency Plan. The Plan will be reviewed for compliance with the requirements of 40 CFR Part 262 Subpart M. Upon a brief initial screening, the document contains a written description of the operations of the GM Arlington facility and a general facility map identifying waste management areas. The document also lists Chris Boehle

and Trinette Morgan as emergency coordinators. We requested personnel training records for these emergency coordinators to ensure training is sufficient.

Clean Air Act Permits

GM Arlington provided copies of the Title V operating Permit No. 01151 effective June 2017 through June 2022, and NSR/PSD Permit No. 19156. These permits will be reviewed for their applicability to the GM Arlington waste management units to ensure that they provide adequate coverage for the facility to qualify for exemption to the RCRA Air Emissions regulations.

Requested Records Discussion

The inspectors continued the discussion regarding the requested records and those that had not been received. Some of those records included:

- Maximum Organic Vapor Pressure for the waste accumulated in the 12,000 gallon Spent Solvent Tank/Waste Purge Thinner Hazardous Waste Tank required by 40 CFR 265 Subpart CC and evaluated under the requirements of 40 CFR 265.1084(c).
- Records demonstrating that the facility's contingency plan was properly disseminated to the relevant local response agencies.
- Personnel training records related to the hazardous waste activities for selected personnel. These records must address each of the elements listed in 40 CFR 262.17(a)(7).
- Facility waste profiles for any solid waste generated since 2019. Include documentation relevant to the waste determination made for each waste (i.e., analytical reports or documentation to support generator knowledge). This information will be evaluated to determine the facility's compliance with the waste determination requirements in 40 CFR 262.11 and 40 CFR 265.1083 and 1084 where applicable. If the waste profile fails to document the 40 CFR 265 Subpart CC requirements, additional documentation may be required.
- Diagrams of waste generating processes, if available. This request is amended to include equipment which may be considered as managing Hazardous Secondary Materials (regardless of all documented declarations made to EPA and the State of Texas) subject to the definition of "contained" promulgated at 40 CFR 260.10. These documents may be engineering diagrams (i.e., P&IDs) for the waste generating processes and solvent purge systems.
- Hazardous waste manifests that are not included in the e-Manifest system for hazardous waste shipments initiated from 2019 to present.
- Land disposal restriction notices for any hazardous waste shipped for off-site disposal from 2019 to present.
- Any agreement between GM and any subsequent waste handler or treatment, storage, or disposal facility pertaining to the management and disposition of GM Arlington's wastes.
- Standard Operating Procedures related to waste generating or management processes. This is also part of the training review since facility waste operations and methods of compliance are typically captured within these documents. The expectation is that individual employees operating under the auspices of these SOPs would be adequately trained to perform these procedures.
- The solvent wipes exemption written plan to exclude waste containing free liquids from the solvent wastes.

March 31, 2022

Volatile Organic Compound (VOC) Monitoring of Spent Solvent Tank/Waste Purge Thinner
Hazardous Waste Tank (NOR #2)

We conducted VOC monitoring at this hazardous waste tank using a FLIR camera and a TVA2020 to inspect readily accessible valves and closure devices. The TVA2020 was calibrated with zero air, 500 ppm methane, and 9500 ppm methane. During our walk around Tank 5, at ground level, we identified 1 open-ended line without a cap. Using our monitoring devices, no VOC emissions were detected. On the roof of the tank, we identified one VOC leak originating from the gasket on the top of a pressure relief valve. When that valve was monitored, the TVA's highest reading was 21,000 ppm above background.

VOC Monitoring of Containers

VOC monitoring was conducted on the containers used for management of solvent contaminated wipes. Per facility representatives, the containment method used for the solvent contaminated wipes consists of a plastic drum liner closed with an overhand knot and a zip tie. The liner is then placed inside a larger, gas permeable cubic yard bag. During the VOC monitoring, an outer cubic yard bag was opened to find the plastic liner not sealed with a zip tie as initially described by facility personnel. VOC measurements with the TVA placed near the knot resulted in a reading of 2,500 ppm above background. A zip tie was immediately cinched to the bag and the subsequent VOC measurement was 400 ppm above background.

Daily Records Review

The facility representatives submitted training records which will be reviewed for compliance with the training requirements of 40 CFR 262.17. They also provided the record of distribution for the contingency plan, and several SOPs which will also be evaluated.

April 1, 2022

I facilitated a closing meeting with facility representatives reviewing the areas of concern. Together we reviewed the outstanding document requests and will continue to coordinate to ensure that the documents are submitted for a complete records review.

These records include:

- Maximum Organic Vapor Pressure for the waste accumulated in the Purge Solvent Tank
- Facility waste profiles.
- Diagrams of waste generating processes.
- Hazardous waste manifests that are not included in the e-Manifest system.
- Land disposal restriction notices.
- Any agreement between GM and any subsequent waste handler or treatment, storage, or disposal facility pertaining to the management and disposition of GM Arlington's wastes.
- Standard Operating Procedures related to waste generating or management processes.
- The solvent wipes exemption written plan.

Section III – PRELIMINARY FINDINGS

- Inspectors observed an open 55-gallon container used in the < 90-day accumulation area that contained aerosol wastes. (Inspection Photo #2)
- There were 2 containers of hazardous waste marked as oxidizers in the < 90-day accumulation area. These oxidizer wastes were stored in close proximity to other organic materials which may be incompatible. (Inspection Photo #4)
- < 90-day accumulation area; one container of “flammable solids” marked as hazardous waste which was leaning off the underlying container.
- Observed 1 container of Chemical Treatment CL-215 waste which appeared to be unused pesticide in the CWAA. The label on this container indicates that it may be an acute waste. A review of the GM Arlington waste generation records will help determine any applicable regulations to this waste. (Inspection Photos #7 and #8)
- In the <90-day accumulation area, it was observed that GM manages solvent wipes in cubic yard bags with a plastic liner. Given the nature of the container, the seal may not be suitable to contain VOCs. During the VOC monitoring, the outer cubic yard bag was opened to find a plastic liner closed with an overhand knot but was not sealed with a zip tie as initially described by facility personnel. VOC measurements with the TVA placed near the knot resulted in a reading of 2,500 ppm above background. (Inspection Photo #1)
- Spent Solvent Tank NOR #2: The facility claims that the spent solvent is not considered generated until it enters the waste tank. We requested correspondence or documentation to support this determination. The emissions regulations applicable to this tank and the associated ancillary equipment is to be determined. (Inspection Photo #17)
- Spent Solvent Tank NOR #2; The spring-loaded pressure relief valve is marked to be set at a trigger pressure of 1 ounce per square inch. On the roof of tank, we identified one VOC leak originating from the gasket on the top of a pressure relief valve. When that valve was monitored, the TVA’s highest reading was 21,000 ppm above background. (Inspection Photos # 14, 15, 16, and 17).

Section IV – List of Appendices

Appendix 1 – Inspection Photo Log

Appendix 2 – Inspection Daily Summaries

Appendix 3 – Facility Map (sourced from facility Contingency Plan)