RCRA Compliance Inspection Report

Hydro Extrusions Portland, Inc

Portland, Oregon

ORD982656076

June 24, 2021

Prepared by:

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U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Inspector Signature/Date:

KATRINA BRADSHAW Digitally signed by KATRINA BRADSHAW
Date: 2021.09.10 09:01:26 -07'00'

Supervisor Signature/Date:

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan
Date: 2021.09.10 09:06:54 -07'00'

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Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility. The onsite inspection was conducted during the Novel Coronavirus (COVID-19) Pandemic and considerations and safety precautions were taken accordingly.

Section A: Basic Facility and Inspection Information

Facility Information

Handler Name:	Hydro Extrusions Portland, Inc
Handler ID Number:	ORD982656076
Facility Contact(s)/Title:	James Warram, HSE Manager
Facility Location Address:	5325 NE Skyport Way Portland, Oregon
Facility Mailing Address:	PO Box 11263 Portland, OR 97211-0263
Contact Phone Number:	James Warram: (503) 802-3117
Contact Email Address:	james.warram@hydro.com
GPS Coordinates of Site:	Lat: 45.57558 Long: -122.607732

Inspection Information

Inspection Type:	RCRA Focused Compliance Inspection (FCI)
Inspection Date:	May 24, 2021
Arrival Time:	0845 hours
Departure Time:	1520 hours
Inspection Team:	Katrina (Katie) Bradshaw (EPA Region 10) Zeb Bates (Oregon DEQ)

Section B: General Facility Information

Owner/Operator Information

Hydro Extrusions Portland, Inc is the legal owner and operator of the facility (Hydro or facility). The site is formerly known as Sapa Extrusion North America, which still appears on the facility's hazardous waste labels (see photo DSCN0378).

Site Location

The Hydro Extrusions Portland, Inc Facility is located at 5325 NE Skyport Way in Portland, Oregon. According to a review of R10 EJSCREEN, the facility is located in an Environmental Justice area, with an 86-percentile score. An aerial view is included in Attachment A.

Background and Activities

Hydro is headquartered and registered in Norway, and operates multiple business units offering aluminum in billets, extrusions, and precision tubing throughout the United States and in 40 countries. The Hydro Extrusions Portland, Inc Facility coats aluminum architectural pieces used in the siding of commercial buildings. The facility runs two production lines: one for larger pieces on the horizontal line and the other for small parts that are run on the vertical line. The facility generates and reports between 440,000 and 602,000 pounds of hazardous waste annually. Hydro has a standard ACDP Air Quality permit (see Attachment D), which was issued 11/21/2018 and expires on 11/01/2023.

Section C: Regulatory Information

Regulatory Status

According to RCRAInfo, the facility first notified the agency of hazardous waste generation activities on 02/28/1992. The database indicates that the facility is currently a Large Quantity Generator (LQG) of hazardous waste. Based on my observations of waste generation, the amount of waste on site during the inspection, and the documentation in e-Manifest, the facility appeared to be generating greater than 1,000 kilograms of hazardous waste per month and was therefore an LQG at the time of the inspection.

Hydro is covered under NAICS code 332812 – Metal Coating, Engraving (Except Jewelry and Silverware), and Allied Services to Manufacturers.

Site Hazardous Waste Information

During the reporting year of 2020, the facility generated the following hazardous wastes:

- Solvents for recycle (waste flammable liquids) – 209,602 lbs
- Metal hydroxide filter cake (F019-Chromium) – 36,300 lbs
- Paint filters and rags contaminated with solvents and chromium – 105,480 lbs
- Waste paint solids from vertical paint line – 3,175 lbs
- Liquid paint waste from vertical paint line – 42, 602 lbs

Section D: Description of Inspection

Purpose of Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection conducted pursuant to Oregon's federally authorized RCRA program. The facility was inspected to evaluate compliance with the organic air emissions standards found in 40 CFR Part 265, Subparts AA, BB, and CC, as incorporated by reference into the Oregon Administrative Rules at 340-100-0002. The inspection was conducted as part of the EPA National Compliance Initiative for organic emissions from RCRA facilities. This was also a joint inspection with Oregon DEQ inspector Zeb Bates performing a Compliance Evaluation Inspection (CEI) on all hazardous waste, universal waste, and used oil activities not including Subparts AA, BB, and CC. The CEI report and compliance determinations will be sent to the facility separately by Oregon DEQ.

Site Access

EPA was not denied access to the facility and was allowed inspection of all areas.

Inspection Entry and Opening Conference

EPA did not provide advance notice of the inspection to the facility. The weather did not affect my ability to conduct the inspection. I performed a calibration and function check on the Toxic Volatile Analyzer (TVA2020) using Zero Air, 500 ppm Methane, and 10,000 ppm Methane gases prior to arrival at the facility. When we arrived at 0845 at the main office, we were met by Jeremy Basler, the West Regional HSE Manager. I explained that we would be performing a joint hazardous waste inspection and showed him my inspector credentials. Mr. Basler said that the other Hydro representatives were in a meeting in a different building and would join us as soon as possible. He took us to the facility's break room, where I calibrated the Forward Looking Infrared Camera (FLIR GF-320) while we waited for the others. Awhile later, we were joined by the following individuals for the opening conference:

James Warram, PE, HSE Manager
Jeni Garcia, Environmental Engineer
Brian Jensen, Interim Plant Manager

At 0930, I opened the meeting by explaining that this was a focused compliance inspection for RCRA organic air emission requirements found in Subparts AA, BB, and CC of Part 265 of Chapter 40 of the Code of Federal Regulations. I explained that I would be leading the inspection, along with Inspector Bates, who would be performing a CEI. I asked Mr. Basler to explain the facility's current operations. He said that the pandemic had reduced the number of employees to about 100, and they were working day and swing shifts, as well as overtime as needed on weekends. They did not have a night shift. He said that the facility brings extruded aluminum from other facilities, which arrives pretreated with a protective coating. It is cleaned with a caustic base and rinsed. They have a POTW permit which covers this process. The parts are then coated in five stages, and recycled solvent is used to flush the equipment used for the coating process.

I asked if they had a leak detection and repair program, and they said they did not. Ms. Garcia mentioned that they recently had an Industrial Hygiene audit (see Attachment D), which recommended they use a Photo Ionization Detector (PID). I asked what kind they had and how they calibrated it, and Mr. Basler said it was a MiniRae 3000; they used Zero Air and Isobutylene 100 ppm for calibration, and it was used mostly for ammonia detection. He said they have a regenerative thermal oxidizer (RTO) for the vertical and horizontal paint lines, which is regulated by their ACDP permit. Mr. Warram provided an emergency response map (see Attachment C), which I used as a site map for orientation. We then requested to tour the facility.

Inspection Summary

We were joined by Zach Miller, the coating supervisor, and we began the inspection at the 90-day Central Accumulation Area for hazardous waste collection. There were two rolloff containers, one of which was empty. The first container was labeled Toluene Chromium Hazardous Waste. Under my direction, Inspector Bates conducted air monitoring of the container with the TVA2020, noting a background of 1.4 ppm, and the highest reading of 90 ppm at the corners (DSCN0376). Mr. Miller opened the container and said it was half full. He then closed it, as we noted that that it was not lined, and there were gaps at the corners. He and Mr. Warram placed cargo straps to tighten the lid down.

We then toured the wastewater treatment area, followed by the satellite accumulation areas (SAAs). I asked Mr. Miller how they managed the recycled solvent. He explained that Emerald Services picks up and drops off recycled solvent once a week, approximately 12 55-gallon drums each time. We then went to the paint kitchen SAA, noting a background reading of 4.0 ppm. I observed a 55-gallon drum collecting used solvent waste, which was not sealed around the collection port (DSCN0381). The TVA2020 measured from 1200 to as high as 7700, with an average reading of 2000 ppm on this drum.

Mr. Miller said that the vertical lines were down for planned maintenance for the day, so we asked to see inside the paint room. At one of the paint booths, we observed two 5-gallon buckets, one filled about half full, and the other about a third full of wet paint. Both buckets were unlabeled, and both lacked a closing device (DSCN0379). Inspector Bates asked if that was hazardous waste, and the representatives explained that yes, it was hazardous waste, but they did not know how to label the containers without paint covering the labels, or how to place a closure device that would seal during operation of the paint booth. Inspector Bates replied that they needed to find an alternative to the current method, because this SAA is not being properly managed. We continued to tour the rest of the facility, and Inspector Bates found several areas of concern in other SAAs, used oil areas, and universal waste areas. We concluded the inspection and broke for lunch.

After lunch, we met back at the break room for a records review and closing conference.

Areas of Concern

The following areas of concern were found during this inspection:

- There was no monitoring program for containers for Subpart CC organic air emission standards
- The 55-gallon container was leaking through an open port at about 2,000 ppm
- The rolloff container, although it was not leaking above 500 ppm at the time of inspection, was considered an open container for the volatile waste managed, as the corners were not sealed

Closing Conference

I requested the following records to be sent by email:

- Documentation showing the leak repair on the rolloffs and 55-gallon drum
- Safety Data Sheets (SDSs) for solvents used at the facility
- Hazardous Waste Profiles
- A copy of the air permit
- A copy of the industrial hygiene audit

They agreed and the inspection team left the facility at 1520 hours.

I received all requested documents on July 2, 2021 from Mr. Warram (Attachment D). The Waste Profile for the recycled solvent from Emerald Services confirmed the concentrations of Volatile Organic Chemicals (VOCs) were above 500 ppm, and therefore subject to Subpart CC requirements.