

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

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EPA ID No. SCD982126146

3) Responsible Officials

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4) Inspection Participants

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Shannon O'Dell, Rogers & Callcott Environmental
Laura Lopez Sosa, Rogers & Callcott Environmental
Tom Richmond, S.C. Department of Health and Environmental Control
Robin S. Duffy, S.C. Department of Health and Environmental Control
William Kappler, U.S. Environmental Protection Agency, Region 4

5) **Date of Inspection**

June 16, 2021

6) **Applicable Regulations**

South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 et seq., [Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927)], and South Carolina Hazardous Waste Management Regulations (SCHWMR), 25 S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279 [40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279].

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**

On June 9, 2021, Environmental Protection Agency inspector William Kappler contacted Wilbert Plastic Services to discuss a joint RCRA compliance evaluation inspection (CEI) with inspectors from the South Carolina Department of Health and Environmental Control (SCDHEC).

On June 10, 2021, Mr. Robert Putman with Wilbert Plastic Services returned the EPA inspector's phone call to discuss the inspection. Mr. Putman explained he did not have email service and Wilbert was working to restore the email system. The inspector introduced himself and explained the purpose of the RCRA CEI, including the date and time of the RCRA inspection, notification procedures due to the Covid-19, the EPA health and safety procedures, general areas for inspection and RCRA records needed for review. Wilbert Plastic Services explained health and safety procedures and the RCRA records for review.

On June 16, 2021, EPA inspector William Kappler accompanied by SCDHEC inspectors Tom Richmond and Robin S. Duffy conducted an announced CEI at Wilbert Plastic Services (hereinafter, "Wilbert" or the "facility") to determine the compliance status of the facility with the RCRA and the State of South Carolina regulations. This was an EPA-lead inspection. Inspectors arrived at Wilbert and were greeted by facility representatives. The inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an opening conference.

Wilbert's staff provided an overview of the facility's history and current operations during the opening conference. The inspectors described the possible use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. §2.203, to assert a business

confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. Wilbert does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Health and safety protocols and required personal protective equipment were discussed. Mr. Putman, Mr. Ryan Howell, and Mr. Derrick Risner, of Wilbert Plastic Services and Ms. O'Dell and Ms. Lopez Sosa, of Rogers & Callcott Environmental led the inspectors on a tour of Wilbert's operations.

8) Facility Description

Wilbert is located at 2930 Greenville Highway, Easley, Pickens County, South Carolina. Manufacturing operations have been occurring at this location since 1974. Wilbert has been operating at this location for approximately 10 years. The facility is owned by Wilbert, Inc., and is located on 41 acres of property. The facility employs approximately 272 people and operates seven days per week, 24 hours per day. The facility consists of one main building with a total space of 244,000 square feet. Easley Central Water District provides potable water service and Pickens County provides domestic waste service. The primary NAICS code for the facility is 326199, All Other Plastic Product Manufacturing.

The facility's paint lines, paint booths, emission control devices and associated equipment are subject to a Title V Operating Permit TV-1880-0052. The permit was issued by the SCDHEC on October 12, 2018, became effective on January 1, 2019, and expires on December 31, 2023. There have been no revisions to the permit to date. Wilbert was last inspected by the SCDHEC air program on August 18, 2020, for compliance with the facility's current Title V Operating Permit. No violations of permit requirements or applicable regulations were noted during the inspection.

Wilbert notified of its regulated waste activity (8700-12) to SCDHEC on July 2, 2019, as a large quantity generator of hazardous waste (LQG) and a small quantity handler of universal waste (SQHUW).

9) General Process Description

Wilbert manufactures and spray paints injection molded plastic parts. The facility manufactures a variety of plastic products such as paddles, screwdriver handles, dispenser faceplates for the petroleum industry and plastic body parts for the automobile, tractor, and air conditioning industry.

The process begins as raw materials are brought onsite in bulk. Polycarbonate pellets are stored in silos located indoors and raw chemical materials are received in 275-gallon totes and 55-gallon containers. The plastic pellets are then blended and pneumatically conveyed to the injection molding machines that make various types of plastic parts. A computer system monitors the distribution of the plastic pellets to each individual injection mold machine through a suction line inserted into a dedicated pellet box. A mold release is applied to the molds prior to the molding process. The molded parts are then placed in storage or transferred for cleaning and painting. The parts that require painting are suspended on a flight line conveyor, which carries them through the cleaning and painting process. Robotic and manual spray-painting operations

are performed. General facility maintenance and repair is conducted in the maintenance shop.

10) **Previous Inspection History**

Wilbert was last inspected by the SCDHEC on June 27, 2019. The facility was cited for failing to close a 55-gallon container in the Mixing Room SAA and for not marking dates on twenty-six 55-gallon containers of hazardous waste in the Central Accumulation Area (Less than 90 Day). The facility corrected the violations.

Wilbert was inspected by the SCDHEC on October 20, 2014. The facility was cited for failing to mark containers in SAAs with the words hazardous waste or with other words that identify the contents of the container; to keep containers holding hazardous waste in SAAs closed during storage; to clean up any hazardous waste discharge in paint booths 2, 3, 4, and 5; to mark the date of accumulation on containers of hazardous waste; to ensure that each container is labeled or marked clearly with the EPA Hazardous Waste Number and the words hazardous waste; to ensure that container storage areas have a containment system; to maintain container aisle space; to contain any universal waste lamps in containers or packages; to label or mark clearly each lamp or a container or package in which such lamps are contained with the words Universal Waste Lamp; to mark or label the universal waste container with a date; to, at least weekly, inspect areas where containers are stored and record inspections in an inspection log or summary; to have facility personnel successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties; to ensure that facility personnel successfully completed the program within six (6) months after the date of their employment; to ensure that facility personnel take part in an annual review of the initial training; to maintain the job title, a written job description, a written description of the type and amount of training and records that document that the training was given; to have a contingency plan that lists names, addresses, and phone numbers of all persons qualified to act as emergency coordinator; to submit a copy of the contingency plan to all local and State authorities; to keep a copy of each Quarterly Report and Exception Report onsite for a period of at least three years; and to keep a copy of each manifest signed in accordance with section 262.23(a) onsite for three years or until receipt of a signed copy from the designated facility which received the waste.

SCDHEC issued the facility a Notice of Alleged Violation/Notice of Enforcement Conference on January 5, 2015. The issues were resolved by a Compliance Order on April 14, 2015.

Wilbert has never previously been inspected by the EPA, Region 4 for compliance with the federal and the State of South Carolina hazardous waste regulations.

11) **Findings**

The information in this RCRA inspection report is based on the EPA's June 16, 2021, RCRA CEI.

Motan Department

This area has eight indoor silos where pellets are stored in bulk. Some of the injection molding requires the pellets to go through a material drying process using molecular sieve desiccant prior to molding. Both dried and bulk pellets are pneumatically conveyed to the Injection Molding Floor. Nitrogen, carbon dioxide and fuel oil are also stored in tanks. No identified hazardous

waste was observed in this area. Documentation that an accurate waste determination was performed on the molecular sieve desiccant was not observed in the record review.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Injection Molding Floor

The facility has 33 injection mold machines in this area. A computer system monitors the distribution of the plastic pellets to each individual injection mold machine through a suction line inserted into a dedicated one-cubic yard pellet box. A mold release is applied to the mold and the product is manufactured and released from the mold. The molded product is either sent to the facility's Paint Department or shipped to the customer.

Spent aerosol cans of mold release are generated in the Injection Molding Floor where the injection molding occurs. The spent aerosol cans are taken to the Maintenance Shop for puncturing.

Maintenance Shop

Molds are maintained and repaired in this area. Mr. Brian O'Shield indicated that New Rapid Tap is used on a mold to lubricate when performing a tapping or drilling procedure on the mold. The excess tapping fluid and metal is removed using a wipe or rag. Mr. Putman indicated the spent wipes and rags are disposed in the municipal solid waste (MSW) stream. The inspectors observed a container accumulating dirty wipes/rags used in the shop for wiping the metal molds. Metal shavings are shipped as scrap metal. Documentation that an accurate waste determination was performed on the spent wipes and rags was not observed in the record review.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

The inspectors observed a part washer ("SmartWasher") in this area (Photograph 1). The part washer uses SW-4 Ozzy Juice Heavy Duty Degreasing Solution.

The maintenance shop personnel puncture aerosol cans containing mold release and other aerosols. The inspectors observed an aerosol can puncturing device connected to the top of a 55-gallon container in a Satellite Accumulation Area (SAA) in the maintenance shop. The inspectors observed the container was closed, labeled with the words hazardous waste (flammable liquids NOS (Toluene, Xylene) Paint & Solvent D001/D035/F003/F005 with profile number 660352) and labeled with a flammable hazard indicator. The inspectors observed the hazardous waste label was applied on top of another hazardous waste label with the edge of the bottom label visible (Photograph 2). In order to provide clear hazard communication on

containers accumulating hazardous waste, previous labels should be removed. The inspectors observed two five-gallon containers accumulating universal waste batteries and universal waste mercury containing equipment on a shelf. The containers were labeled with the words universal waste batteries and universal waste mercury containing equipment and dated March 21, 2021 and February 11, 2021, respectively. The inspectors observed the printed universal waste information on the labels were small. The inspectors suggested that the facility apply labels with larger print on the containers.

Water Eater Wastewater Evaporator

Wastewater generated from cleaning the process floors (floor scrubber water), mop water from the entire plant and water collected in catch pans from the presses is accumulated in a container. The floors are cleaned using a degreaser (SNB-130) containing caustic chemical ingredients. SNB-130 has a non-diluted pH of 13.3-14.0. The wastewater is processed in a “Water Eater Wastewater Evaporator Model 85E” (Evaporator).

On July 16, 2021, the EPA sent an email to Wilbert asking for additional information on the Evaporator, which is located on the north corner of the facility. Wilbert provided the additional information in an email to EPA on the same date. The additional information included that the Evaporator was purchased from Equipment Manufacturing Corporation, and that Wilbert has been operating the Evaporator for five years. The Evaporator has a capacity of 85-gallons and it is operated 8 hours per day, five days per week processing approximately 100 gallons of wastewater per day. The wastewater is processed by increasing the temperature using the Evaporator’s electrically powered heater to the steam point, which evaporates the water. The residue (solids/sludge) remaining in the Evaporator is then pumped out and shipped as used oil. Emissions for the evaporator are controlled through a 6-inch diameter vent stack. The Evaporator is regulated under the Title V Operating Permit. Documentation that an accurate waste determination was performed on the wastewater entering the Evaporator unit and the residue leaving the unit was not observed in the record review.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Paint Department

The paint department consists of cleaning and wiping molded parts, air spraying the molded parts to remove any remaining residue and painting operations. Mr. Derrick Risner is the paint manager.

The Paint Department operates a robotic paint line and a manual paint line using enclosed paint booths. The Robotic Paint Line consists of an automated primer coat booth, a base coat booth and a clear coat booth. The robotic spray-painting emissions are controlled by an automated “Binks Dynaprecipitor” water wash spray booth. The Manual Paint Line consists of primer coat, base coat, and clear coat booths. The manual spray-painting emissions are controlled by replaceable wall mounted paint spray filters.

Cleaning and Rework Area

The inspectors observed the facility using isopropyl alcohol (IPA) and methyl ethyl ketone (MEK) dispensed from safety cans with a pump activated sprayer on a wipe to clean the molded parts. The spent wipes are accumulated in a 5-gallon red safety container. The inspectors observed the container closed, labeled with the words “Excluded Solvent Contaminated Wipes” and marked with the date June 14, 2021 (Photograph 3). The inspectors observed that the wipes accumulating in the container appeared to be dry. The facility indicated they are managing the spent wipes in accordance with the Solvent Contaminated Wipes Rule. The spent wipes are disposed in the Pickens County Landfill, 2043 Old Liberty Road, Liberty, South Carolina.

The inspectors observed that the records required to be maintained pursuant to 25 S.C. Code Ann. Regs. 61-79.261.4(18)(iv) & (v)(C) [40 C.F.R. 261.4(18)(iv) & (v)(C)] did not describe the use of MEK in the process, did not provide a description of the process the generator is using to ensure solvent-contaminated wipes contain no free liquids at the point of being transported for disposal and did not describe how free liquids removed from the solvent-contaminated wipes or from the container holding the wipes must be managed according to the applicable regulations found in S.C. Code Ann. Regs. 61-79.260 through 273 [40 C.F.R. 260 through 273].

Carbon Dioxide Spray Booth Area

Compressed carbon dioxide crystals are robotically sprayed onto the parts to clean the parts prior to painting. No hazardous waste was observed in this area.

Robotic Primer Paint Booth

The inspectors observed the booth was in operation at the time of the inspection. A waterfall curtain is used to capture emissions. Wilbert manages a hazardous waste SAA at the Robotic Primer Paint Booth. The inspectors observed two 5-gallon containers accumulating hazardous waste paint and solvent from the painting process in this SAA. The containers were covered with over sprayed paint and were not marked or labeled with the words hazardous waste and were not marked or labeled with a hazard indicator (Photograph 4).

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 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 44-56-60(a)(2) and (b)(3) 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 satellite accumulation area conditions listed in 25 S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, A generator must mark or label its container with the following: (i) The words “Hazardous Waste.”

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, An indication of the hazards of the

contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Robotic Clear Coat Booth

The inspectors observed the Robotic Clear Coat Booth, which is used to robotically apply a clear coat to parts, was not in operation at the time of the inspection. Wilbert manages a hazardous waste SAA at this booth. The inspectors observed one open and empty 5-gallon container labeled with the words “In Process Purge Solvent” (Photograph 5) in this SAA. Mr. Risner indicated to inspectors that these words are labeled on containers in the SAAs. The inspectors advised the facility to properly label container(s) in SAAs prior to accumulating any hazardous waste.

Robotic Paint Storage Shed

Located adjacent to the Robotic Clear Coat Booth inspectors observed the Robotic Paint Storage Shed. The storage shed is equipped with a grated floor which provides secondary containment for the paint products. The inspectors observed a paint spill in the secondary containment of the storage shed at the time of the inspection (Photograph 6).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], a large quantity generator 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)(3) 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. R.61-79.262.90, A generator must clean up any hazardous waste discharge that occurs during generation or processing or storage and take such other action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment. See also 262.34(a)(4) and 265 Subpart D.

Robotic Paint SAA

Wilbert manages a hazardous waste SAA across from the Robotic Paint Storage Shed. The inspectors observed one 55-gallon container accumulating hazardous waste in this SAA. The inspectors observed the container was on a spill pallet, closed, labeled with the words hazardous waste (flammable liquids NOS (Toluene, Xylene) Paint & Solvent D001/D035/F003/F005 with profile number 660352) and labeled with a flammable hazard indicator. The inspectors also observed one 5-gallon container used for storing the funnel for the 55-gallon container. The inspectors observed visible paint waste was accumulating in the bottom of the container and a paint spill in the spill pallet at the time of this inspection (SCDHEC Photographs 14, 16, 17 and 18). Although the 5-gallon container was labeled with a flammable hazard indicator, it was not closed or labeled with the words “Hazardous Waste.”

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, A generator must mark or label its container with the following: (i) The words “Hazardous Waste”.

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 container holding hazardous waste must be closed at all times during accumulation.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.90, which is a condition of the LQG Permit Exemption, A generator must clean up any hazardous waste discharge that occurs during generation or processing or storage and take such other action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment. See also 262.34(a)(4) and 265 Subpart D.

Robotic Primer Coat Booth Water Wash Area

The Primer Booth is equipped with a waterfall curtain to capture the paint emissions. The water is recirculated in a trough located behind the paint booth. Wastewater generated from the operation is shipped approximately one time per year. Paint solids are separated from the water by the addition of Poly D-Tac SF, resulting in the paint solids floating on the water surface. Mr. Putman indicated the pH range of the system is 9-11 and explained the paint solids are periodically removed from the trough and accumulated in a 55-gallon container. The inspectors observed a 55-gallon container on a cart in this area accumulating paint solids. The inspectors observed the container was closed, labeled with the words non-hazardous waste, and labeled with a flammable hazard indicator (SCDHEC Photograph 35). Documentation that an accurate waste determination was performed on the wastewater and paint solids was not observed in the record review.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Cage Area

Across from the Robotic Primer Coat Booth Water Wash Area inspectors observed a locked chain-link cage. The inspector observed an open 55-gallon container storing a white material. The facility explained the white material was Chemico 8011 booth grease which is applied in the manual paint booths to prevent the paint from adhering to the walls (Photograph 7). Mr. Putman explained the process of scraping the paint booth walls is done by a contractor. The waste paint and grease scraped from the sides of the paint booths are disposed of in the MSW stream. Documentation that an accurate waste determination was performed on the waste paint and grease was not observed in the record review.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R.

§ 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Central Accumulation Area (90-Day Area)

The 90-Day Area is constructed of concrete walls and a concrete floor sealed with an epoxy. The 90-Day Area is secured with a locked chain-link gate and inspectors observed posted signage designating the area as a hazardous waste storage area. The epoxy coating on the floor of the 90-Day Area appeared deteriorating in many areas. The concrete floor should be resealed.

Inspectors observed five 55-gallon containers accumulating hazardous waste positioned along the wall of the 90-Day Area. The inspectors observed the containers were closed, in good condition with aisle space, labeled with the words hazardous waste, marked with a flammable hazard indicator, and marked with dates in May or June 2021. The earliest date observed was May 11, 2021 (Photographs 8 and 9).

Inspectors observed two additional 55-gallon containers accumulating hazardous waste positioned on the opposite wall. The inspectors observed the containers were closed, in good condition with aisle space, labeled with the words hazardous waste, marked with a flammable hazard indicator, and marked with the date June 2, 2021. Inspectors observed the information on the preprinted hazardous waste labels could not be clearly read. The inspectors observed a pen or pencil was used to manually scribble over the information. Ms. Lopez-Sosa explained that the containers were accumulating two new waste streams, consisting of rags saturated with solvent and spill pigs. The facility needed to profile each new waste stream and did not have the preprinted hazardous waste labels. Corrected information should be marked through with a single line, dated and initialed.

Spill kits were observed and employees working in the area have radios for communication.

Paint Mix Room

Paint and solvent products are mixed in 55-gallon containers for use in the paint booths. Wilbert manages a hazardous waste SAA in the Paint Mix Room for accumulating hazardous waste (xylene and toluene D001, D035, F003, F005). The inspectors observed one 55-gallon drum on a spill pallet in this SAA. The inspectors observed the container was closed, in good condition, labeled with the words hazardous waste and marked with a flammable hazard indicator. The spill pallet had a visible spill(s) of paint at the time of the inspection (SCDHEC Photograph 28).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.90, which is a condition of the LQG Permit Exemption, A generator must clean up any hazardous waste discharge that occurs during generation or processing or storage and take such other action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment. See also 262.34(a)(4) and 265 Subpart D.

Wilbert manages another hazardous waste SAA under a part washer for accumulating hazardous waste solvent (acetone) used to clean the paint equipment. Spent solvent flows through a bottom drain into a 5-gallon container observed in this SAA. The part washer was not in operation. The inspectors observed the 5-gallon container was not closed, was not marked or labeled with the

words hazardous waste, and was not marked or labeled with a hazard indicator (Photograph 10).

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 container holding hazardous waste must be closed at all times during accumulation.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, A generator must mark or label its container with the following: (i) The words “Hazardous Waste”.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Manual Paint Line

The Manual Paint Line consists of five spray paint booths consisting of a primer coat, base coat, and clear coat operation. During spray painting operations the emissions are controlled by replaceable wall mounted paint spray filters in the paint booth. Documentation that an accurate waste determination was performed on the used paint booth filters was not observed in the record review.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 25 S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in 25 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Paint Booth 2 - Primer Coat

The inspectors observed the booth was in operation at the time of the inspection. Wilbert manages a hazardous waste SAA to accumulate waste paint and solvent generated at the Primer Coat booth. The inspectors observed a 5-gallon container in this SAA. The container was marked with the words, “In Process Purge Solvent”. The container was not closed, was not marked or labeled with the words hazardous waste, and was not marked or labeled with a hazard indicator (Photograph 11).

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 container holding hazardous waste must be closed at all times during accumulation.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, A generator must mark or label its

container with the following: (i) The words “Hazardous Waste”.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Paint Booth 4 - Base Coat

The inspectors observed the booth was in operation at the time of the inspection. Wilbert manages a hazardous waste SAA for accumulating waste paint and solvent generated in the Base Coat booth. The inspectors observed two 5-gallon containers in this SAA. The containers were marked with the words, “In Process Purge Solvent”. The containers were not closed, were not marked or labeled with the words hazardous waste, and were not marked or labeled with a hazard indicator (Photograph 12).

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 container holding hazardous waste must be closed at all times during accumulation.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, A generator must mark or label its container with the following: (i) The words “Hazardous Waste”.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Paint Area Maintenance Shop

The inspectors observed an apparent stainless-steel cart used as a part washer in the shop. Wilbert manages a hazardous waste SAA for accumulating hazardous waste solvent (acetone) generated in this parts washer. The inspectors observed a 5-gallon container in this SAA under the part washer. The acetone is used to clean the paint equipment and flows through a bottom drain into the 5-gallon container. The part washer was not in operation. The inspectors observed the 5-gallon container was not closed, not marked, or labeled with the words hazardous waste and not marked or labeled with a hazard indicator (Photograph 13 and SCDHEC Photograph 33).

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 container holding hazardous waste must be closed at all times during accumulation.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, A generator must mark or label its container with the following: (i) The words “Hazardous Waste”.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Non-Hazardous Waste Storage Area

The inspectors observed twelve 55-gallon containers labeled with the words non-hazardous waste in this area. Mr. Putman explained the containers were accumulating waste paint solids generated from the Robotic Primer Coat Booth Water Wash Area and that shipments are conducted two times each year. The containers were accumulating waste without aisle space. The facility opened the containers to show the inspectors they were accumulating waste paint solids. The inspectors observed two 55-gallon containers were not marked or labeled with the words non-hazardous waste but were labeled with a flammable hazard indicator (Photograph 14).

Upon leaving the non-hazardous waste storage area, the inspectors observed a closed 55-gallon container located behind the Primer Coat Booth Water Wash Area. The 55-gallon container, which previously held a flammable product, was labeled as non-hazardous waste and it was still labeled with a flammable liquid hazard indicator. The inspectors advised the facility if they are reusing product containers to accumulate non-hazardous waste all product marks and labels should be removed prior to non-hazardous waste accumulation.

12) Waste Management Practices

Wilbert operates several SAAs and a 90-Day or Less Central Accumulation Area. Hazardous waste and non-hazardous waste streams are managed in containers.

Molecular sieve desiccant used to dry pellets prior to injection molding is generated in the Motan Department. Waste part washer fluid (SW-4 Ozzy Juice Heavy Duty Degreasing Solution), waste solvent generated from puncturing aerosol cans and spent wipes and rags contaminated with New Rapid Tap fluid are generated in the maintenance shop. Wastewater generated from cleaning the process floors (floor scrubber water), mop water from the entire plant and from catch pans from the presses is processed in an Evaporator. Residue is generated from processing the wastewater in the Evaporator. Waste IPA and MEK wipes, waste paint and solvent D001, D035, F003, F005, used paint booth filters and waste paint and Chemico 8011 booth grease are generated in the paint department. The waste IPA and MEK wipes are managed as excluded solvent contaminated wipes and shipped to the Pickens County Landfill, 2043 Old Liberty Road,

Liberty, South Carolina. Waste acetone F003 is generated from cleaning paint equipment in part washers in the paint mix room and paint area maintenance shop. Wastewater and paint solids are generated from the robotic paint booth water wash area. Metal shavings are shipped as scrap metal. The facility generates universal waste batteries, universal waste mercury containing equipment and used oil.

Molecular sieve desiccant is transported by VLS Recovery Services, Inc., (Formerly JB Environmental Services) to the Anderson Regional Landfill. The waste wipes and rags contaminated with New Rapid Tap fluid are disposed in the municipal solid waste stream. Residue generated from the Evaporator is transported by S.C. Waste Management LLC to either a recycling plant or an asphalt plant for fuel. The amount of water in the waste stream determines the destination facility. Wastewater and paint solids generated from the paint booth water wash area is transported by VLS Recovery Services, Inc., to their destination facility in Spartanburg, SC. VLS is a VSQG, used oil processor and universal waste destination facility (Formerly JB Environmental Services). Used paint booth filters and waste paint and booth grease is transporter by Waste Management to a landfill. Used oil is transported by S.C. Waste Management LLC, to either a recycling plant or an asphalt plant for fuel. The amount of water in the used oil determines the destination facility. The facility ships hazardous waste approximately monthly. The facility prepares the hazardous waste for packaging and onsite management, prior to shipping the hazardous waste using the manifest system to a treatment, storage, or disposal facility (TSDF).

Wilbert used the following transporters in 2019 through 2021.

Freehold Cartage, Inc. – NJD054126164

Robbie D. Wood – ALD067138891

Stat, Inc. – INR000123497

Tradebe Transportation, LLC – INR000123497

Maumee Express, Inc. – NJD986607380

VLS Recovery Services, Inc. - SDR000762468

Wilbert used the following TSDF in 2018 through 2021.

Tradebe Treatment & Recycling - TND000772186

Rineco – ARD981057870

Tradebe Treatment & Recycling – IND000646943

13) Record Review

Due to the COVID-19 pandemic, the EPA sent an email to Wilbert on June 10, 2021, requesting they submit as many RCRA records as possible for review by June 11, 2021. A list of the RCRA records was attached to the EPA's email. Wilbert was not able to provide the RCRA records due to computer issues. Wilbert provided the RCRA records in hard copies for review on the day of the inspection.

RCRA Site Identification (Form 8700-12)

Wilbert provided the most recent subsequent notification showing they notified as a large quantity generator, dated June 15, 2021.

Manifests

The inspectors reviewed hazardous waste manifests, land disposal restrictions and non-hazardous waste manifests from January 29, 2019 to December 17, 2019, from February 2020 to December 2020 and from December 17, 2020 through June 7, 2021. The inspectors observed hazardous waste manifest number 014991983FLE dated December 17, 2020 had information in box 8 “Designated Facility Name and Site Address” lined though the original destination facility’s (Tradebe Treatment and Recycling) address, phone number and EPA ID number and replaced with a substitute address, phone number and EPA ID number for the same company (Tradebe Treatment and Recycling), but alternate location. The inspectors also observed that box 7 “Transporter 2 Company Name” include the handwritten name of an alternate transporter “Maumee Express, Inc., NJD986607380”. It appears the person making the changes on the manifest documented the changes with their initials. The destination facility documented the manifest changes using their form “Tradebe Off Spec Notification/Resolution” signed by Richard Elliott of RMI LLC. The handwritten signature of the alternate destination facility was not documented on the manifest. This manifested shipment was included on the Fourth Quarter 2020 RCRA report, but the manifest was not entered into eManifests. The inspectors requested documentation from the TSDF confirming that the hazardous waste on manifest 014991983FLE dated December 17, 2020 had been received, but the documentation was not provided.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.20(d) [40 C.F.R. § 262.20(d)], If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator must either designate another facility or instruct the transporter to return the waste.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(2) [40 C.F.R. § 262.42(a) (2)], a generator of greater than 1,000 kilograms of hazardous waste in a calendar month 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. The Exception Report must include: A legible copy of the manifest for which the generator does not have confirmation of delivery and a cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

Waste Determination/Profiles/Safety Data Sheets (SDS)

The inspectors reviewed copies of the waste determination, generator waste profile, Hazardous Waste Stream Determination Form (HWSDF), laboratory analysis and SDS documents.

The inspectors reviewed copies of SDSs for Spectracron SAC F9A Deere (paint), New Rapid Tap (cutting oil), SW-4 OzzyJuice Heavy Duty Degreasing Solution (parts washer), SNB-130 (cleaning agent/degreaser), and Methyl Ethyl Ketone.

The inspectors reviewed the waste profiles and HWSDF for molecular sieve desiccant (pellet drying) generated in the Motan Department and for the wastewater, paint solids and used paint booth filters generated in the Paint Department. The HWSDF for the wastewater, paint solids and molecular sieve desiccant indicated that the waste streams were determined to be non-hazardous waste using process knowledge. The inspectors reviewed the HWSDF and the laboratory report for the sampling and analysis on the used paint booth filters for RCRA metals dated September

9, 2019. The laboratory analysis did not include flashpoint, TCLP volatiles and semi-volatiles. Documentation that an accurate waste determination was performed using process knowledge and laboratory analysis on these solid wastes was not observed in the record review.

The inspectors requested the waste determination records on the Evaporator's wastewater and residue (solids/sludge). Ms. O'Dell explained that Wilbert had not made a waste determination on the waste streams.

Records documenting that an accurate waste determination was performed on spent wipes and rags generated in the Maintenance Shop and for waste paint and grease generated in the manual paint booths was not observed by inspectors in the record review.

Solvent Contaminated Wipes

The inspectors observed the documentation for the solvent contaminated wipes did not describe the use of MEK in the process, did not provide a description of the process the generator is using to ensure solvent-contaminated wipes contain no free liquids at the point of being transported for disposal and did not describe how free liquids removed from the solvent-contaminated wipes or from the container holding the wipes must be managed according to the applicable regulations.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.261.4(b)(18)(v)(c) [40 C.F.R. § 261.4(b)(18)(v)(c)], a description of the process the generator is using to ensure solvent-contaminated wipes contain no free liquids at the point of being transported for disposal.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.261.4(b)(18)(iv) [40 C.F.R. § 261.4(b)(18)(iv)], free liquids removed from the solvent-contaminated wipes or from the container holding the wipes must be managed according to the applicable regulations found in parts 260 through 273.

Contingency Plan

The inspectors reviewed the contingency plan (Plan). The inspectors observed the Plan's Emergency Event Contacts on pages 13 and 14 lists Ryan Howell, Robert Putman, Mike Hachee, Donnie Powell, and Derek Risner but in Appendix B the list of Emergency Contacts are Mike Hachee, Robert Putman, Donnie Powell, and Derek Risner. The inspectors did not observe who was designated as the primary, secondary and/or alternates coordinators in the Plan.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.261(d) [40 C.F.R. § 262.261(d)], which is a condition of the LQG Permit Exemption, the plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see § 262.264), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. In situations where the generator facility has an emergency coordinator continuously on duty because it operates 24 hours per day, every day of the year, the plan may list the staffed position (e.g., operations manager, shift coordinator, shift operations supervisor) as well as an emergency telephone number that can be guaranteed to be answered at all times.

Quick Reference Guide

The inspectors observed the Quick Reference Guide provided for review did not include the

location of the SAAs on the map of hazardous waste storage and generation areas and it did not include the water flow rate and location of fire hydrants.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.262(b)(4) [40 C.F.R. § 262.262(b)(4)], which is a condition of the LQG Permit Exemption, A map of the facility showing where hazardous wastes are generated, accumulated, and treated and routes for accessing these wastes.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.262(b)(6) [40 C.F.R. § 262.262(b)(6)], which is a condition of the LQG Permit Exemption, The locations of water supply (e.g., fire hydrant and its flow rate).

Arrangements with Local Authorities

The arrangements with the local authorities were reviewed. The inspectors observed in the contingency plan's Appendix C "Arrangements with Agencies and Contractors" the letters issued to the Easley Fire Chief, Pickens County EMA and JBR were dated August 8, 2019. The contingency plan was revised in March 2021, but no records were provided to indicate that the revised plan was submitted to the local emergency responders.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.256(a)], which is a condition of the LQG Permit Exemption, the large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

Personnel Training

The inspectors reviewed RCRA training given to employees in November 2019, September 2020, and June 2021. Job titles and position descriptions for Paint Mixer, Paint Maintenance Tech 1, Paint Department Manager and Process Engineer were reviewed.

Weekly Container Inspection Records

The inspector reviewed the weekly container inspection records for the 90-Day Central Accumulation Area from July 1, 2019 to June 11, 2021.

RCRA Quarterly Report

The quarterly reports were reviewed from the first quarter of 2018 through the first quarter 2021.

Waste Minimization Report

The inspectors reviewed the FY2018, FY2019 and FY2020 waste minimization reports.

14) Closing Conference

Upon conclusion of the inspection, a closing conference was conducted in the presence of Wilbert Plastic Services. The facility was informed of the findings at the time of the inspection.

15) **Conclusion/Summary of Violations**

Based on the CEI conducted on June 16, 2021, Wilbert Plastic Services was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

16) **Signed**

WILLIAM
KAPPLER

Digitally signed by WILLIAM
KAPPLER
Date: 2021.08.03 13:36:13
-04'00'

William Kappler
Physical Scientist
RCRA Enforcement Section

Date

17) **Concurrence**

ARACELI
CHAVEZ

Digitally signed by
ARACELI CHAVEZ
Date: 2021.08.03 12:29:56
-04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Wilbert Plastic Services
SCD982126146
June 16, 2021
RCRA CEI Photographs
William Kappler, US EPA
Camera Model: Samsung WB250F
Property Tag #: S75917



Wilbert Plastic Services (Wilbert). Maintenance Shop. Part washer. Photograph 1 taken at 10:38 a.m.

Wilbert Plastic Services
SCD982126146
June 16, 2021
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Wilbert. Maintenance Shop. Aerosol puncturing SAA. The inspectors observed the hazardous waste label was applied on top of another hazardous waste label with the edge of the bottom label visible. Photograph 2 taken at 10:46 a.m.

Wilbert Plastic Services
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June 16, 2021
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Wilbert. Paint Department. Excluded Solvent Contaminated Wipes. Photograph 3 taken at 10:59 a.m.

Wilbert Plastic Services
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June 16, 2021
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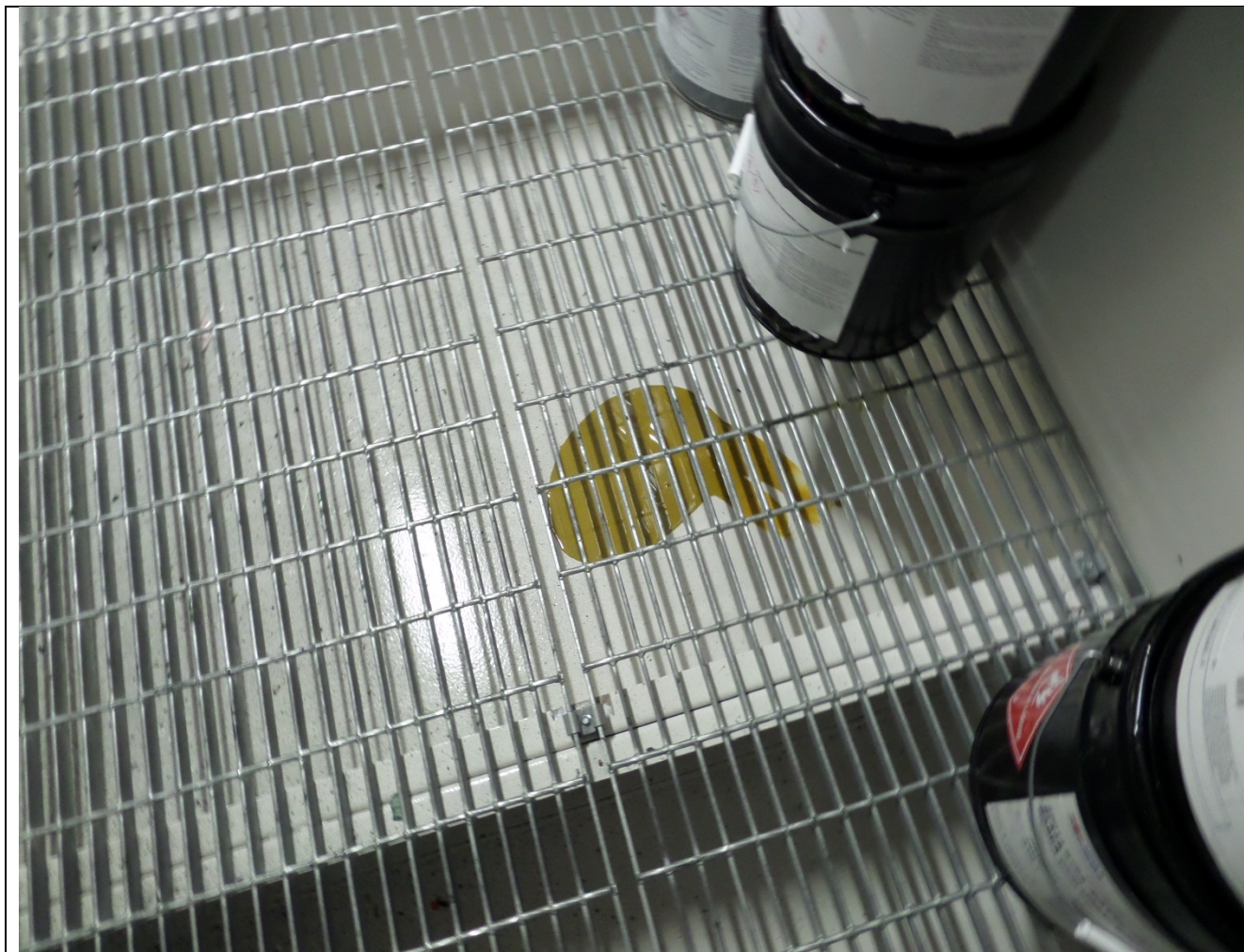
Wilbert. Paint Department. Robotic Primer Paint Booth. Observed container not labeled with the words hazardous waste and no hazard indicator. Photograph 4 taken at 11:07 a.m.

Wilbert Plastic Services
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June 16, 2021
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Wilbert. Paint Department. Robotic Clear Coat Paint Booth. Observed container labeled with the words "In Process Purge Solvent". Container was empty. Photograph 5 taken at 11:12 a.m.

Wilbert Plastic Services
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June 16, 2021
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Wilbert. Paint Department. Robotic Paint Storage Shed. Observed a paint spill to the containment. Photograph 6 taken at 11:16 a.m.

Wilbert Plastic Services
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June 16, 2021
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Wilbert. Paint Department Cage. White Booth Grease. Photograph 7 taken at 11:30 a.m.

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Wilbert. CAA/90-Day or Less Accumulation Area. Observed containers accumulating hazardous waste. Observed the floor epoxy appeared to be deteriorating. Photograph 8 taken at 11:39 a.m.

Wilbert Plastic Services
SCD982126146
June 16, 2021
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Wilbert. CAA/90-Day or Less Accumulation Area. Observed containers accumulating hazardous waste. Observed the floor epoxy appeared to be deteriorating. Photograph 9 taken at 11:39 a.m.

Wilbert Plastic Services
SCD982126146
June 16, 2021
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Wilbert. Paint Mix Room. Observed a container under a part washer. Observed the container was not closed, not marked/labeled with the words hazardous waste and no hazard indicator. Photograph 10 taken at 11:45 a.m.

Wilbert Plastic Services
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June 16, 2021
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Wilbert. Paint Department. Manual Paint Booth 2. Observed a container was not marked/labeled with the words hazardous waste and no hazard indicator. Photograph 11 taken at 11:52 a.m.

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June 16, 2021
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Wilbert. Paint Department. Manual Paint Booth 4. Observed a container was not marked/labeled with the words hazardous waste and no hazard indicator. Photograph 12 taken at 11:55 a.m.

Wilbert Plastic Services
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June 16, 2021
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Wilbert. Paint Department. Paint Maintenance. Observed a container not kept closed and was not marked/labeled with the words hazardous waste. Photograph 13 taken at 11:58 a.m.

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SCD982126146
June 16, 2021
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Wilbert. Non-hazardous Waste Accumulation Area. Observed twelve 55-gallon containers accumulating paint solids from water wash booth. Observed a hazard indicator on two containers. Photograph 14 taken at 12:02 p.m.

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SCD982126146
June 16, 2021
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Wilbert. Robotic Paint SAA. The inspectors observed a 5-gallon container with a funnel accumulating hazardous waste. Photograph 14 taken by SCDHEC at 11:20 a.m. The SCDHEC Photographs in this report document the Photograph number used in the State of South Carolina report.

Wilbert Plastic Services
SCD982126146
June 16, 2021
RCRA CEI Photographs
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Wilbert. Robotic Paint SAA. The inspectors observed a release/spill of hazardous waste. Photograph 16 taken by SCDHEC at 11:20 a.m. The SCDHEC Photographs in this report document the Photograph number used in the State of South Carolina report.

Wilbert Plastic Services
SCD982126146
June 16, 2021
RCRA CEI Photographs
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Wilbert. Robotic Paint SAA. The inspectors observed a 5-gallon container with a funnel accumulating hazardous waste. Photograph 17 taken by SCDHEC at 11:20 a.m. The SCDHEC Photographs in this report document the Photograph number used in the State of South Carolina report.

Wilbert Plastic Services
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June 16, 2021
RCRA CEI Photographs
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Wilbert. Robotic Paint SAA. The inspectors observed a 5-gallon container with a funnel accumulating hazardous waste. Photograph 18 taken by SCDHEC at 11:22 a.m. The SCDHEC Photographs in this report document the Photograph number used in the State of South Carolina report.

Wilbert Plastic Services
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June 16, 2021
RCRA CEI Photographs
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Wilbert. Paint Mix Room SAA. The inspectors observed a release/spill of hazardous waste. Photograph 28 taken by SCDHEC at 11:45 a.m. The SCDHEC Photographs in this report document the Photograph number used in the State of South Carolina report.

Wilbert Plastic Services
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June 16, 2021
RCRA CEI Photographs
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Wilbert. Paint Maintenance Shop. The inspectors observed a part washer with a 5-gallon container accumulating waste acetone. Photograph 33 taken by SCDHEC at 12:02 p.m. The SCDHEC Photographs in this report document the Photograph number used in the State of South Carolina report.

Wilbert Plastic Services
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June 16, 2021
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Wilbert. Paint Booth Wash Water Area. The inspectors observed paint solids accumulating in a 55-gallon container generated from the wash water booth. Photograph 35 taken by SCDHEC at 12:04 p.m. The SCDHEC Photographs in this report document the Photograph number used in the State of South Carolina report.