

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
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2) Facility Information

DaikyoNishikawa USA Inc.
9000 Greenbrier Parkway, NW, Unit 95
Madison, AL 35756
Limestone County
EPA ID Number: ALR000065730

3) Responsible Official

Casey Sweeney
EHS Manager
DaikyoNishikawa USA Inc.
9000 Greenbrier Parkway, NW, Unit 95
Madison, AL 35756
c-sweeney@dnusinc.com

4) Inspection Participants

Casey Sweeney	DaikyoNishikawa USA Inc.
Corey Holmes	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

January 24, 2024, at 9:45 a.m. CST

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).¹

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a) [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7)(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(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 KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6) (b) or (7)(a)) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(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 ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-11-.02(1)(a)244. [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of DaikyoNishikawa USA Inc., EPA ID Number: ALR000065730 with the applicable regulations.

8) Facility Description

DaikyoNishikawa Corporation is a comprehensive plastic products manufacturer headquartered in

¹ 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.

Hiroshima, Japan. DaikyoNishikawa Corporation's main business is the manufacture and sales of automotive and housing plastic products.

DaikyoNishikawa USA Inc. (DNUS) is a tier one automotive plastic parts supplier of front and rear fascia bumpers, spoilers, IP instrument panels and dashboards for Japanese automakers such as Mazda and Toyota in the United States. DNUS which is located at 9000 Greenbrier Parkway in Madison, Alabama, was founded in June 2019. The site is approximately 500,000 square feet and consists of an office area and manufacturing area. The facility operates 24 hours per day, 6 days per week in two 12-hour shifts. DaikyoNishikawa USA Inc. employs approximately 484 full time employees with 9 employees handling hazardous waste.

DaikyoNishikawa USA Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated April 10, 2023, characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. DNUS generates ignitable (D001), corrosive (D002), benzene (D018), and spent non-halogenated solvents (F003) and (F005) wastes.

9) Previous Inspection History

This facility had not been inspected by either the EPA or Alabama Department of Environmental Management (ADEM).

10) Findings

On January 24, 2024, EPA inspector Paula Whiting, accompanied by Alabama Department of Environmental Management (ADEM) inspector Corey Holmes, arrived at DaikyoNishikawa USA Inc. at approximately 9:45 a.m. CST. Mr. Casey Sweeney, EHS Manager, immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Mr. Sweeney, and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records.

Mr. Sweeney provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before the facility's representative led the inspectors on a tour of the facility's operations. Below is a description of the observations made during the inspection.

10.1 Less than 90-Day Central Accumulation Area (CAA) – Paint Kitchen 1

DNUS had a hazardous waste CAA in Paint Kitchen 1 which was an enclosed paint shop with product drums and mixing equipment. Five 55-gallon hazardous waste drums of clear coat paint waste and waste flammable liquids (EPA Waste Codes D001, F003 and F005) were observed in the center aisle (Pictures 1-2). The room was identified with hazardous waste storage and warning signs on the exterior wall. Inside the room was secondary containment and coating on the floors.

Mr. Sweeney stated that a hazardous waste pickup was scheduled for the next day.

10.2 Satellite Accumulation Area (SAA) – Paint Kitchen 2

The inspectors then walked through the Production Area and observed the moulding press and the base coat paint system. An Aerovent aerosol can puncture system was observed in the Production Area (Picture 3). At the time of the inspection, the 55-gallon drum was empty and not labeled.

Paint Kitchen 2 was an enclosed paint shop with product drums and mixing equipment. The inspectors observed two 55-gallon drums of non-hazardous base coat primer water-based paint waste (Pictures 4-5). The drums were closed and labeled.

In the Clear Coat Paint Room, the inspectors observed a SAA with a 55-gallon hazardous waste drum of Robowaste actively being piped into the drum (EPA Waste Codes D001, F003 and F005) (Pictures 6-7). The drum was closed and labeled. Next to the paint waste drum was a 55-gallon drum of used paint waste debris such as absorbent pads with solvent, personal protection equipment, rags, and cups. At the time of the inspection, the drum was not labeled or placarded. Mr. Sweeney had staff to immediately label the drum.

10.3 Slush Moulding

The Slush Moulding Area was a touch up booth that used powder paint solid to coat the outside of the moulding. The waste solid is skimmed and placed in a drum for disposal. The inspectors observed a 55-gallon drum of hazardous waste solid that was full, not closed, labeled, and dated January 10, 2024 (Pictures 8-10). Mr. Sweeney had staff to immediately close the drum.

10.4 Electro Clean Storage

The Electro Clean Storage Area is maintained by Michelle Hood, who explained that sodium hydroxide is used in cleaning the parts. The inspectors observed an empty 55-gallon SAA drum near the door and a 350-gallon tote of waste sodium hydroxide closer to the process and used as a collection container when the process was pumped out (Pictures 11-13). At time of the inspection, the tote only had 40-gallons inside, and the inspectors were told that it takes a week to reach 55-gallon in the tote. Then the contents of the tote would be pumped into the drum for pick up. The inspectors observed the tote was not closed or labeled. Mr. Sweeney had staff to immediately close and label the tote.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

The inspectors explained that if the tote exceeded 55-gallons the area became a CAA and would require weekly inspections, signage and to be secured. Also transferring from SAA to SAA is not

allowed and the facility needed to decide how they would collect the waste sodium hydroxide other than using the tote and then transferring the waste into drums. The inspectors also observed the secondary containment in the floor was full and needed clean out.

Warning for potential excess of 55 gallons: Although DaikyoNishikawa USA, Inc. may manage more than one container in the same SAA, please note that the SAA Permit Exemption limits the total volume of waste accumulated in this area at any given time to be no more than 55 gallons. Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with ADEM Admin. Code r. 335-14-3-.01 (7)(a) [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days.

On February 2, 2024, Mr. Sweeney emailed the inspectors pictures of the slush mould room where the tote was collecting waste. Mr. Sweeney stated that the issues had been corrected by removing the tote and they had started collecting the waste in only 55-gallon drums. In addition, the secondary containment grating had been cleaned out.

11) Records Review

The inspectors requested the training records, the contingency plan, the weekly inspection records, the 2021-2023 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated April 10, 2023.

The inspectors requested the training records for the employees handling hazardous waste. Training certificates for Casey Sweeney, Michelle Hood, Travis Ware, Andrew Bailey, Samuel Allen, and Nicholas Smith were requested. Mrs. Hood, Mr. Ware, and Mr. Allen received the DNUS RCRA Hazardous Waste/Materials training module in 2023. Mr. Bailey and Mr. Sweeney received RCRA Hazardous Waste Management online training by Lion Technology for 2023.

At the time of the inspection, the training record for Mr. Smith was not available, however, Mr. Smith had been signing manifests. On February 2nd, Mr. Sweeney emailed the inspectors the training record for Mr. Smith dated January 31, 2024, for the DNUS RCRA Hazardous Waste/Materials training module. Job titles and descriptions were provided and reviewed.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7(iii) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required by this section.

The inspectors requested the Contingency Response Plan dated August 2, 2019, for review. The plan included a current emergency contact list, an evacuation map, a fire extinguisher inspection list, a list of emergency response equipment, a RCRA Quick Reference Guide, and documentation (i.e., green return receipt cards, emails) that copies of the current contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital).

The weekly inspection records for the Paint Kitchen 1 CAA from 2020 to 2023 were reviewed. No issues were observed.

Hazardous and non-hazardous manifests were reviewed for 2020-2023. Hazardous wastes were shipped to Clean Earth of Alabama (EPA ID ALD981020894) in Glencoe, AL and Safety Kleen Systems, Inc. (EPA ID SCD077995488) in Lexington, SC. The land disposal restriction forms were reviewed.

12) Summary

The inspectors conducted the exit meeting with Mr. Sweeney and Mr. Bailey. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. DaikyoNishikawa USA Inc. was inspected as a LQG of hazardous waste.

13) Signed

PAULA WHITING
Digitally signed by PAULA WHITING
Date: 2024.04.08 19:15:15 -04'00'

Paula A. Whiting
Environmental Engineer

Date

14) Concurrence

ARACELI CHAVEZ
Digitally signed by ARACELI CHAVEZ
Date: 2024.04.09 12:45:44 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

DAIKYONISHIKAWA USA INC.

MADISON, ALABAMA

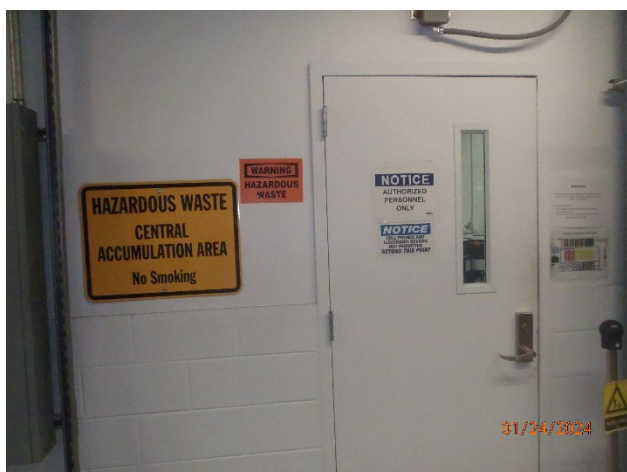
COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

January 24, 2024

Photos taken by Paula A. Whiting

Camera Type: Olympus Tough

Serial Number: SC7374



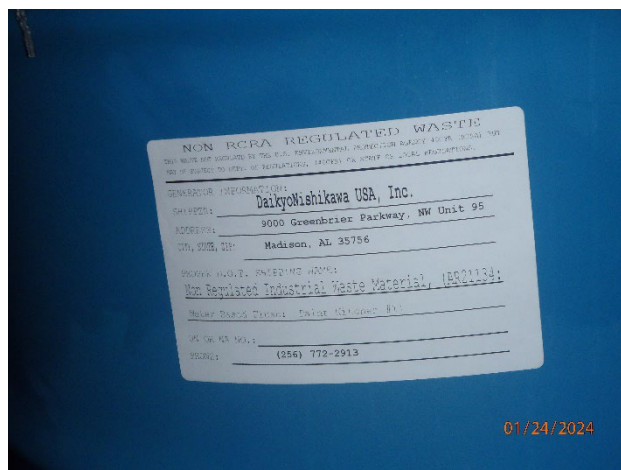
Picture 1 – Paint Kitchen 1 CAA entrance



Picture 4 – Paint Kitchen 2 non-hazardous waste drums



Picture 2 – Paint Kitchen 1 CAA



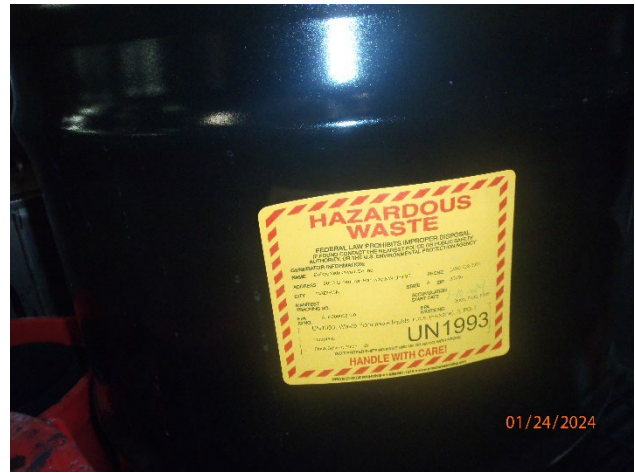
Picture 5 – Paint Kitchen 2 non-hazardous waste drum label



Picture 3 – Aerovent Aerosol Can puncture system drum



Picture 6 – Paint Kitchen 2 SAA



Picture 9 – Slush Moulding SAA label



Picture 7 – Paint Kitchen 2 SAA entrance



Picture 10 – Slush Moulding SAA open drum - Closed



Picture 8 – Slush Moulding SAA



Picture 11 – Electro Clean Storage HW tote



Picture 12 – Electro Clean Storage floor drain grate full



Picture 13 – Electro Clean Storage