

Hazardous Waste Section
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

DEC 05 2011

*Copies to
Mike W
Jenny P
Original to
file room.*

Ms. Elizabeth W. Cannon, Chief
Hazardous Waste Section
NCDENR – Div. of Waste Management
217 West Jones Street
Raleigh, North Carolina 27603

SUBJ: RCRA Compliance Evaluation Inspection
Revlon Consumer Products Corporation
EPA I.D. Number: NCD 980 729 875

Dear Ms. Cannon:

On September 15, 2011, an EPA-lead Compliance Evaluation Inspection was conducted by the United States Environmental Protection Agency along with the North Carolina Department of Environmental and Natural Resources (NCDENR) at the Revlon Consumer Products Corporation facility in Oxford, North Carolina, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Enclosed is the EPA RCRA Site Inspection Report which indicates that a violation of RCRA was discovered. Pursuant to the 2003 Hazardous Waste Civil Enforcement Response Policy, Day 0 is the date of the inspection referenced above.

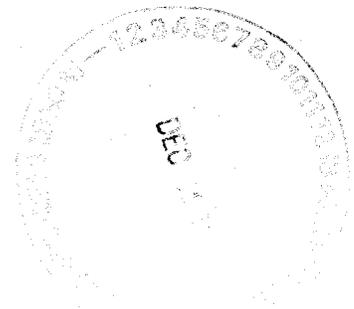
If you have any questions regarding this matter, please contact John C. Goodwin, of my staff, by phone at (404) 562-8488 or by email at goodwin.john@epa.gov.

Sincerely,

Doug C. McCurry, Chief
North Enforcement and Compliance Section
RCRA and OPA Enforcement and
Compliance Branch
RCRA Division

Enclosure

cc: Phil Orozco, NCDENR





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DEC 05 2011

Alicia Mitchell, Director
Safety, Health and Environmental Affairs
Revlon Consumer Products Corporation
1501 Williamsboro Street
Oxford, North Carolina 27565

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EPA I.D. Number: NCD 980 729 875

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Sincerely,

A handwritten signature in black ink, appearing to read "Doug C. McCurry".

Doug C. McCurry, Chief
North Enforcement and Compliance Section
RCRA and OPA Enforcement and
Compliance Branch
RCRA Division

Enclosure

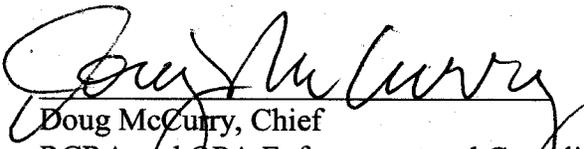
13) Signed



John C. Goodwin, Environmental Engineer
RCRA and OPA Enforcement and Compliance North Section
RCRA and OPA Enforcement and Compliance Branch
RCRA Division

11-7-11
Date

Concurrence



Doug McCurry, Chief
RCRA and OPA Enforcement and Compliance North Section
RCRA and OPA Enforcement and Compliance Branch
RCRA Division

11/30/11
Date

Enamel Line 1115 & Line 1110

Three drums at different locations of Line 1115 were observed properly marked and closed. Three drums on Line 1110 were observed properly marked and closed.

Boiler Room

One drum of used oil was closed and marked as hazardous waste.

QA Lab

The facility operates a lab for testing product samples. Two hazardous waste containers were observed in the lab. One container of Karl Fischer waste was properly marked and closed. Also a container of PEHPLC waste was properly marked and closed.

Records Review

The inspectors requested the following documents for inspection: waste manifests, personnel training records, weekly inspection logs, biennial report/notification, waste determinations, contingency plan, and the waste minimization plan. It was observed that one of the LDR waste profiles identified MEK contents in the outgoing shipment of Manifest 000128077GRR. Waste codes D001, F003, and F005 for the inkjet waste was marked. D035 was not marked on the manifest. Therefore, the facility has failed to properly manifest their waste in accordance with the regulations.

11) Out-Briefing

The inspectors conducted the exit meeting on September 15, 2011. The preliminary inspection findings were discussed during that time.

12) Violations

During the inspection the following violation was discovered:

The facility has failed to adhere to 40 C.F.R. § 262.20(a)(1) adopted by reference at 15A NCAC 13A .0107, which states that a generator who offers for transport a hazardous waste to an offsite treatment, storage, and disposal facility, must prepare a Manifest according to the instructions included in the Appendix in this part. Item 13 of the appendix states that the manifest should list up to six waste codes which are most representative of the properties of the waste.

Returns Hazardous Waste Storage Area

Three drums of hazardous waste were observed marked, closed, and dated. The drums contain paint cans, bleaching product, and flammables. The waste is generated in the nearby Returns area.

Returns

The returns are segregated by workers depending on whether the product is hazardous or non-hazardous. Hazardous waste is placed into gray storage containers marked as hazardous waste. Damaged containers are segregated from the intact containers. Five containers of hazardous waste were observed properly marked and closed. The total amount of hazardous waste at the satellite area was less than 55 gallons. The facility has satellite generation points in the Refurbishing Area, Bulk Lipstick, and Sanitation Room C. No deficiencies were noted in these areas.

Trash Room A

A satellite drum is maintained in Trash Room A to ensure that no hazardous waste are missed at the segregation centers. The drum was properly marked and closed.

Inkjet Room

One drum of inkjet waste was observed properly marked and closed.

Air-Dryer Room

One drum of used oil was observed closed and marked as hazardous waste.

Sanitizing B

Two drums on different lines were observed marked and closed.

Line 1403 Colorsilk

A satellite drum on Line 1403 was marked "AZARDOUS WASTE." The H had been painted over. The EPA recommends that the facility mark the container of hazardous waste clearly with the words identifying the contents of the container.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine whether Revlon was in compliance with the applicable requirements of RCRA and the corresponding NCDENR regulations. The EPA took the lead on the inspection.

8) **Facility Description**

Revlon is a manufacturer of cosmetics and fragrances. The facility occupies 1.1 million square feet on 123 acres. The facility operates 24 hours/5 days a week and employs approximately 1500 employees. The facility water supply is through the local municipality. Septic systems are located onsite. The facility generates wastes through its manufacturing process and returns program in which unused or damaged products are returned from the vendors. The facility is registered as a Large Quantity Generator of hazardous waste.

9) **Previous Inspection History**

Revlon received compliance assistance visits from NCDENR on 6/10/10, 9/10/10, and 5/12/11. An inspection from 11/29/06 by NCDENR found the facility to be a Significant Non-Complier (SNC) that resulted in a Consent Order.

10) **Findings**

John C. Goodwin, EPA, and Phil Orozco, NCDENR, arrived at Revlon at 9:30 a.m. on September 15, 2011. Alicia Mitchell received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. All drums observed during the inspection were 55-gallons in capacity unless noted otherwise.

Hazardous Waste Storage Shed

The first area inspected was the Hazardous Waste Storage Shed where the facility stores hazardous waste for less than 90 days. The facility had a shipment of 99 drums earlier that morning. There were 87 drums of hazardous waste and one drum of universal waste observed in the secured location. The fire control equipment, spill containment kit, and communications devices were adequate.

Dispo Shed

One satellite drum was observed marked and closed in the Dispo Shed located near the Hazardous Waste Storage Shed. Universal waste lamps were observed properly marked and closed in the Dispo Shed.

RCRA Inspection Report

1) Inspector and Author of Report

John C. Goodwin, Environmental Engineer
United States Environmental Protection Agency (EPA) – Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303
(404) 562-8488

2) Facility Information

Revlon Consumer Products Corporation
1501 Williamsboro Street
Oxford, North Carolina 27565
(919) 603-2000
EPA ID #: NCD 980 729 875

3) Responsible Officials

Alicia Mitchell
Director of Safety, Health and Environmental Affairs
Revlon Consumer Products Corporation (Revlon)
(919) 603-2553

4) Inspection Participants

Alicia Mitchell, Director of Safety, Health and Environmental Affairs, Revlon
Mayumi Lawson, Industrial Engineer, Revlon
Herman Williams, Group Leader
Jessie Williams, Waste Management Technician
William J. Welz, Vice President of Manufacturing
John C. Goodwin, Environmental Engineer, EPA
Phil Orozco, Senior Environmental Specialist, North Carolina Department of Environment and Natural Resources

5) Date and Time of Inspection

September 15, 2011

6) Applicable Regulations

40 Code of Federal Regulation (C.F.R.), Parts 261, 262, 264 – 266, 268, 270, 273, & 279
Resource Conservation and Recovery Act (RCRA) Sections 3005 and 3007,
(42 US Code - Annotated U.S.C.A. 6925 and 6927), and Title 15A Chapter 13, North Carolina
Administrative Code (NCAC).