HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM

Your Name: Jeff Menzel
Facility ID Number: NCR000137158
Facility Name: BRP USA, Inc.
Document Group: Inspection/Investigation (I) **Document Type:** I - Compliance Evaluation Inspection (CEI)
Description for File (for CARA): CEI no violations
Date of Document: 6/2/2016
Author(s) of Document: Jeff Menzel

Inspector ID #: NC014 **Suborganization:** Western Region

Comments for RCRAInfo:CEI with no violations noted

County (if not on report): Mitchell

NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH

RCRA INSPECTION REPORT

1. **Facility Information:** BRP USA, Inc.
   1211 Greenwood Road, Spruce Pine, NC 28777
   EPA ID#: NCR000137158
   Generator Status: LQG

2. **Facility Contact:** Bernice Wilson, Title: EH&S Professional
   Phone Number: 828-766-1100

3. **Inspector(s):** Jeff Menzel NCDEQ

4. **Date of Evaluation:** June 2, 2016

5. **Date of Report:** June 27, 2016 – Prepared by: Jeff Menzel

6. **Facility Description:**

   This facility is a manufacturer of boat motor assembly components and other equipment. Processes include molding of polystyrene forms, lost foam casting, shot blasting, machining, Aluminum conversion coating, Aluminum impregnation, and spray painting. The facility operates four shifts and supports 233 personnel, under NAICS # 331524 and 332813. They have water and sewer service from the Town of Spruce Pine.

7. **Waste Streams:**

   Wastes Generated: hazardous or regulated waste streams generated on-site:
   F019 - wwt sludge from chrome conversion process
   D001 - waste MAK paint related waste
   D007 – waste liquid containing Chromium
   D002 – waste Sodium Hydroxide
   Universal Waste lamps, Solid Non-HW paint filters, Non-HW coolant, Non-HW oily styrene bead, Non-HW Imprex Waste

   Transporters:
   NuCarth SCR000779454
   TSDF's:
   RINECO ARD981057870

8. **Document Review:**

   Inspection Records: Weekly inspections are conducted and recorded as required. The inspection report includes SPCC and storm water issues, roof stacks, used oil, and non-hazardous waste, as well as required hazardous waste storage compliance.

   Contingency Plan: The primary emergency coordinator is Tim Forbes. Alternates are Bernice Wilson and Mike Gouge. The plan was last updated March 4, 2016. The plan describes the actions personnel must take to respond to an emergency event, it lists emergency coordinators, and includes an evacuation plan. The plan describes emergency arrangements made with local emergency response agencies. Copies of letters and certified mail receipts are on file.

   Training Records: The facility conducted training for 11 persons in May 2016, including emergency coordinators.

Emergency Preparedness: The facility maintains their emergency equipment to assure operation during an emergency. The facility has designated hazardous waste storage areas. Personnel handling hazardous waste have access to communication devices and emergency equipment. They maintain a PA system, telephones, fire alarm system, sprinkler system, and spill control equipment and decontamination equipment. All emergency equipment is maintained and tested periodically.

Biennial Report: The report was filed electronically in February 24, 2016.

Waste Minimization Plan: Since the last inspection the facility has started recycling foam slices, expanded bead, and Tyvek suits. The facility has an aggressive waste minimization program. They pre-inspect molds and parts to prevent manufacture of imperfect parts. Much of the operation is robotic to allow controlled drippage as well as safety. Chromium is being removed from the waste water waste stream. Aluminum is cooled under an Argon blanket to prevent oxidation and allow more Al waste to be recycled. The conversion process uses counter-rinsing to lessen water usage. Metal shavings and coolant are collected and recycled. The paint process used automated paint mixing and HVLP guns. The quench tower continues to improve water usage. It allows water to cool and be reused on-site. Improvements to housekeeping, preventative maintenance, inventory controls, and purchasing controls continue to allow minimization of waste.

9. Facility Walkthrough:

Satellite Area/ Sludge Press Storage area: The facility has upgraded their wastewater pretreatment system. This upgrade incorporates newly determined WQ levels from the POTW. The facility operates one accumulation and storage area for paint waste. Used oils and other oily wastes are collected throughout the facility. At the time of inspection one (1) 55-gallon container holding D001 paint related waste (MAK) was in the paint press area. Additionally, the facility manages the area under the filter press as a 90-day storage area and collects filter cake sludge in a 300 gallon Gaylord box.

Storage Area(s): Hazardous waste storage has been moved outside the main facility and is stored in a closed metal shed at the rear of the property. The storage building is equipped with alarms, a sprinkler system, spill kit, and communications. The fire marshal has approved the new area for D001 storage. At the time of inspection four (4) 55-gallon containers holding D001 paint related waste (MAK) and one (1) 300 gallon Gaylord box holding filter press sludge was present in the storage area. Other 55-gallon containers holding non-HW pig mats, paint filters, and oily beads were stored in an adjacent open shed. All containers were labeled, dated, and closed as required.

10. Recommendations:

The facility has drafted a plan to manage aerosol cans and will be implementing that plan in the near future. Aerosol cans could be listed as a hazardous waste in one of three ways: 1) the can itself due to reactivity [empty can could detonate or explode], 2) the liquids product contained within the can, and 3) the gaseous propellant. Depending on how the cans are managed will determine if they are excluded or subject to the full hazardous waste regulations. A steel aerosol can that does not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)), and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(iv) if it were to be recycled. The can would need to be punctured and drained in order to be subject to the recycling exemption and the liquids/gases from the puncturing process would need to be managed per the appropriate regulations. It is a reminder that the facility ensure that it is properly managing spent or used aerosol cans.

JEFF MENZEL/ 6/27/2016
NC HWS-COMPLIANCE BRANCH

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cc:
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