

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

Your Name: Phil Orozco

Facility ID Number: NCD980729875

Facility Name: Revlon Consumer Products Corporation

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: TNOV #2016-021 was issued as a result of the CEI on 1/28/16.

Date of Document: 1/28/2016

Author(s) of Document: Phil Orozco

Inspector ID #: NC018

Suborganization: Eastern Region

County (if not on report): GRANVILLE

For Violations:

Enforcement Date: 2/23/2016

Docket Number: 2016-021

Enforcement Type: TNOV

How many violations were there? 1

For IANOV or CO: The facility is

Outcome Measures for CSE for IANOV or CO:

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

Violation #1:

Date Determined: 1/28/2016

Scheduled Return to Compliance: 3/28/2016

Actual Return to Compliance: [Click here to enter a date.](#)

Regulation Description: 262.34(c)(1)(i) – 265.173(a)

Comment: Three 55-gallon satellite accumulation containers were not properly closed.

For CSE, Corrections to Violations were:

Violation #2:

Date Determined: [Click here to enter a date.](#)

Scheduled Return to Compliance: [Click here to enter a date.](#)

Actual Return to Compliance: [Click here to enter a date.](#)

Regulation Description:

Comment:

For CSE, Corrections to Violations were:

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Name: **Revlon Consumer Products Corporation**
Type of Facility: Large Quantity Generator
EPA ID: **NCD980729875**
Facility Location: 1501 Williamsboro Street
Oxford, NC 27565
Telephone Number: (919) 603-2000; Alicia Mitchell @ 603-2553

2. FACILITY CONTACT:

Alicia Mitchell – Director of Safety, Health and Environmental Affairs

3. SURVEY PARTICIPANTS:

Alicia Mitchell - Director Safety, Health and Environmental Affairs
Mayumi Lawson - EHS Engineer
Phillip G. Orozco - Environmental Senior Specialist, Hazardous Waste Section, DWM, NCDEQ

4. DATE OF INSPECTION: January 28, 2016

5. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279.

6. COMPLIANCE HISTORY

Previous CEIs were conducted on March 25, 2014, September 15, 2011 and November 28, 2006. A Compliance Order with Penalty had been under litigation for nearly four years between 2007 into 2011. The Order was issued as a result of the inspection conducted on November 28, 2006. The Order was re-issued on April 29, 2010 and a Settlement Agreement was signed on September 23, 2010.

In order to assist Revlon maintain compliance, Compliance Assistance Visits were conducted on 6/10/10, 9/10/10, 5/12/11 and 6/21/12. The CEI conducted on 9/15/11 was a joint inspection with the U.S. EPA.

7. FACILITY DESCRIPTION:

Revlon is a manufacturer of cosmetics, including nail enamel and hair color products.

General Information:

- Legal owner of business: Revlon Consumer Products Corporation
- Legal owner of property: Revlon Consumer Products Corporation
- Square footage of occupied space : 1.1 Million Square Feet
- Acreage: 123 acres
- Operating shifts: 3 shifts 24/5
- Number of employees: 1375 with 512 temporary employees
- List of waste streams (haz & non-haz):

Hazardous Waste listed below in Section 7.

Non-Hazardous Waste:

Recycled cardboard, plastics and metals
Tank tailings mixed with sawdust
WWTP sludge and solids
Off Spec raw products
Solid waste from food prep/cafeteria; paper products; non-recyclable trash

- Areas inspected : Satellite Accumulation Areas; Filling and Assembly Operations; Hazardous Waste Storage Shed; Disposition Shed
- Water supply: Municipal
- Municipal sewer/septic/on-site treatment facility: All onsite
- Number of on-site wells : 0
- Groundwater monitoring wells on-site: None
- Distance to closest off-site well: Unknown
- Closest private residence : Adjacent to property
- Names & Titles of HW management group:

Alicia Mitchell	Director Safety, Health and Environmental Affairs
Mayumi Lawson	Industrial Engineer
Hermann Williams	Group Leader
Brian Hargrove	Waste Management Tech A

8. HAZARDOUS WASTE STREAMS INCLUDE:

D001, D035, F003, F005

Ignitable off specification and out of date finished products, some containing MEK
Ignitable off specification and out of date nail enamel, spent acetone from line flushing and equipment cleaning
Finished products, alcohol, spent alcohols used to flush and clean equipment
Ignitable solvents containing ink from cleaning and flushing coding equipment
Ignitable paper and cloth wipes containing alcohols and acetone

D001, D002

Corrosive and oxidizing off specification and out of date finished product and raw materials
Universal waste lamps, batteries and computers

9. AREAS OF REVIEW AND INSPECTION:

- **Emergency Preparedness** - Coordination Arrangements with Emergency Responders were made. Documents/letters dated 7/23/08 indicate compliance with 40 CFR 265.37.
- **Contingency Plan (CP)** – The plan was last revised in July 2015. It was sent via UPS to the appropriate agencies on 8/4/15.
- **Inspection Records (storage)** – Appeared to be complete.
- **Manifests / LDR** – Appeared to be complete.

➤ **Training Records** – Appeared to be complete.

In-House training on hazardous waste management is provided to Revlon employees at the time of their initial assignment of duties and annually thereafter. In-house training includes satellite accumulation area (SAA) management, HW storage handling and management, manifests, universal waste, cathode ray tube (CRT) management, chemical spill response, contingency plan and emergency coordinator responsibilities. Universal waste training was has been provided in the past.

	In-House Training (RCRA & CP)	NCDEQ RCRA Workshops
Alicia Mitchell	5/11/12 5/9/13	4/18/13 5/15/14 5/14/15
Hermann Williams	5/29/08 (initial) 5/11/12 5/9/13	4/25/13 5/15/14 5/14/15
Jessie Williams	7/11/07 (initial) 5/11/12 5/9/13	4/25/13 5/15/14 5/14/15
Henry Terry	4/7/08 (initial) 5/20/09 This CEI did not note his	4/25/13 5/15/14 5/14/15
Mayumi Lawson	5/20/09 (initial) 5/11/12 5/9/13	4/25/13 5/15/14 5/14/15
Brian Hargrove	5/11/12 5/9/13	4/25/13 5/15/14 5/14/15

➤ **Biennial Report** – Revlon’s Biennial Report was submitted on the day of inspection, 1/28/16.

➤ **Transporters:**

Shamrock Environmental Corp. NC0 000 942 144
Action Resources ALR 000 007 237
Robbie D. Wood ALD 067 138 891

➤ **TSD's:**

Heritage – WTI OHD 980 813 541
Giant Resource Recovery ALD 070 513 767
Universal waste lamps & batteries have been sent to Global Recovery LLC, St. George, SC, in the past

➤ **Satellite Accumulation Areas (SAAs):**

1. Trash Room A – Not inspected
2. Boiler Room
3. Boiler Room
4. Nail Enamel Line # 1110 - 55-gallon containers
5. Nail Enamel Line # 1115 – 55-gallon containers
6. Nail Enamel Line # 1120 – *Refer to pictures(s) below and the Deficiencies section of the report.*
7. Line #1125 – *Refer to pictures(s) below and the Deficiencies section of the report.*
8. Line #1403 – two 55-gallon containers
9. Colorsilk Line #1405 – two 55-gallon containers

10. Colorsilk Line #1435 – two 55-gallon containers
11. Cleaning & Sanitizing Room (A) - one 55-gallon container
12. Cleaning & Sanitizing Room (B) - one 55-gallon container
13. Compressor Room - one 55-gallon Used Oil container
15. Cleaning & Sanitizing Room (C) - one 55-gallon container
16. Lip Stick Bulk Manufacturing
17. Forklift Shop – Not inspected.
19. QA Lab - The facility operates a QA lab for testing product samples. Four hazardous waste containers were observed in the lab. One 5-gallon container and two 500 ml containers holding Karl Fischer waste were properly marked and closed. An additional 5-gallon container of PEHPLC waste and another 5-gallon container were observed properly marked and closed at another part of the lab.
20. Waste Disposition Shed – An area where typically non-hazardous waste is accumulated and segregated prior to disposal.

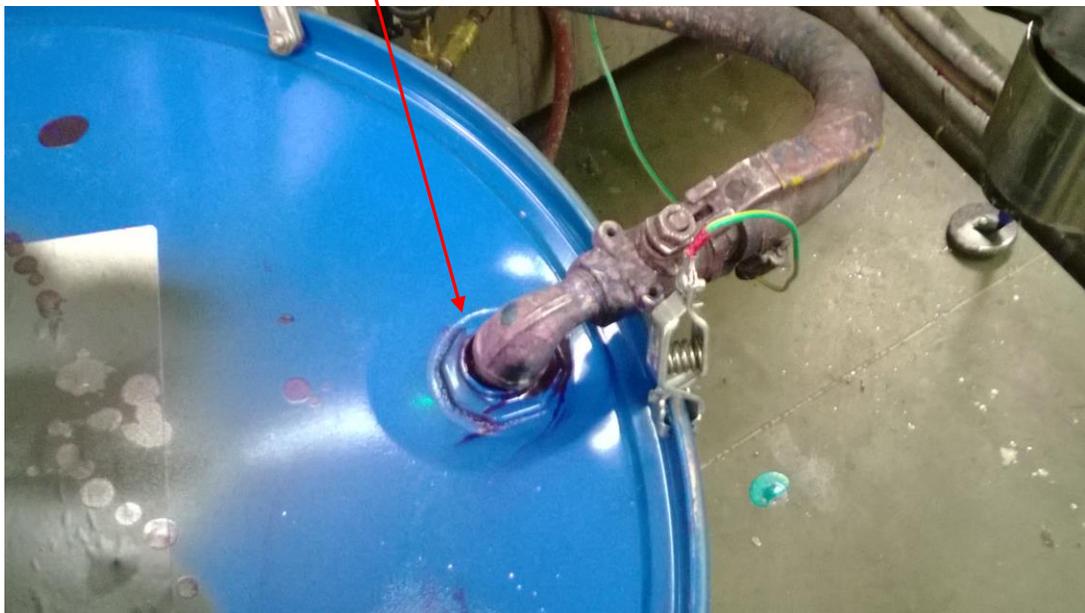


The drum at Line 1120 containing waste solvent. The hose used to pump the waste into the container was not in use but was observed still in the small bung hole on the drum. No one was working on the line at the time of inspection.





The drum at Line 1120 containing waste solvent. The hose used to pump the waste into the container was not in use but was observed still in the small bung hole on the drum. No one was working on the line at the time of inspection.



➤ **Storage Areas:**

The **Hazardous Waste Storage Shed** is located outside the main plant. The shed consists of a concrete containment pad that is covered by a roof with a wire fence front face and a locked, gated entrance. Used Lamps are also stored in this location. No issues were observed.

10. WASTE MINIMIZATION:

A written plan was revised to include a Material Usage Initiative in 2005. Revlon's waste minimization program is well maintained. Information related to the plan is updated annually and records are maintained in electronic files.

11. DEFICIENCIES:

40 CFR 262.34(c)(1)(i) – 265.173(a) A generator may accumulate as much as 55 gallons of hazardous waste containers at or near any point of generation (the satellite accumulation area) and under the control of the operator provided that each container of hazardous waste remain closed, unless waste is being added or removed from the container. On the day of inspection, one 55-gallon drum container located at Line 1120 and one 55-gallon drum located at Line 1125 were observed open. A hose used to pump waste into each respective container was observed in the small bung hole of each drum. No one was working at either line at the time of inspection. The valve to each of the two hoses was left open but no waste was being pumped into the containers at the time of inspection.

In addition, a 55-gallon drum located in the Clean & Sanitize Room-A was observed with a funnel that did not provide a tight seal between the funnel and the connection that screws into the drum's bung hole. For this reason, the drum was determined not to be closed in accordance with the rule.

12. COMMENTS:

As mentioned above, a 55-gallon drum located in the Clean & Sanitize Room-A was observed with a funnel that did not provide a tight seal between the funnel and the connection that screws into the drum's bung hole. The drum was full and liquid could be seen in the drum's secondary containment. The drum was moved in order to collect a sample from the secondary container. When the drum was moved, solvent waste leaked from the connection between the stem that screws the funnel into the drum and the attached funnel. As such, the container was not properly closed.

The flash point of the sample was tested. The result indicated that the liquid had a flash point of 170° Fahrenheit. As such, the liquid would not be a hazardous waste. However, the result was deemed invalid due to the fact that the flash point instrument had not been calibrated for at least 18 months. In addition, a test was run on a sample of pure uncontaminated acetone and the result indicated the flash point to be 118° Fahrenheit. Acetone is known to have a flash point of -4° Fahrenheit.

In the future, please ensure that all funnels are properly maintained such that the seal between the connection and the funnel remain tight. In addition, please determine the exact requirements for calibrating and maintaining the flash point test instrument. Act accordingly.


Phillip G. Orozco

Environmental Senior Specialist, NCDEQ

Date: February 19, 2016