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

Your Name: Heather Goldman

Facility ID Number: NCD982134181

Facility Name: ASMO North Carolina, Inc.

Document Group: General (G)

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File Description/Comments: SQG requested CAV. Deficencies to be addressed through technical assistance.

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County (if not on report): Iredell

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

SMALL QUANTITY GENERATOR (SQG) COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1. **FACILITY INFORMATION:**

Name:	**ASMO North Carolina, Inc.**
EPA ID Number:	**NCD982134181**
Type of Facility:	Small Quantity Generator (SQG)
Facility Location:	470 Crawford Road, Statesville, NC 28625
Facility Address:	470 Crawford Road, Statesville, NC 28625
Telephone Number:	704-878-6663
County:	Iredell

2. **AUTHOR OF REPORT:** Heather Goldman, Environmental Senior Specialist, NCDEQ
   980-224-9858 heather.goldman@ncdenr.gov
   Date of Report: February 17, 2016

3. **FACILITY CONTACT:** Danny Yount, EHS Engineer
   Office: 704-878-6663 Ext. 8540
   E-Mail: dyount@asmo-na.com

4. **SURVEY PARTICIPANTS:**
   Danny Yount – EHA Engineer; Maika Khang – Safety Coordinator; Heather Goldman - ESS NCDEQ

5. **DATE OF INSPECTION:** January 15, 2016

6. **PURPOSE OF EVALUATION:**
   An evaluation to determine compliance with hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA) which are described at Chapter 40 of the Code of Federal Regulations (40 CFR), Parts 260 – 270, 273, and 279; and Title 15 Chapter 13A Hazardous Waste Management Rules (Rules) of the North Carolina Administrative Code (NCAC).

7. **DESCRIPTION OF FACILITY:** ASMO North Carolina, Inc. (facility) manufactures DC motors for the automotive industry. The facility produces electric motors for blowers, power seats, power steering, power windows, and pinch sensors. Most hazardous waste is generated from the motor painting process, out dated materials, crushed fluorescent lamps, and waste aerosols. The facility also generates used oil from machinery maintenance. The facility takes electronic waste, recycled silver dross, lead batteries to Smart Metals in Statesville, NC for recycling.
   The facility requested a Compliance Assistance Visit and was operating as a Small Quantity Generator at the time of the site visit.

   General Information:
   - Legal owner of facility: ASMO Co. Ltd.
   - Legal owner of property: ASMO NC, Inc.
   - Number of Employees/Shifts: Approximately 550 employees/ three shifts operating 24/7
   - Water supply (municipal or well): City of Statesville
   - Municipal sewer/septic/on-site treatment facility: City of Statesville

- Number of on-site wells: Several closed wells. Two ground water wells used for process water, two wells for cooling water.
- Distance to closest off-site well: Unknown
- Closest private residence: Approximately 430 feet
- Site Acreage: Approximately 65.46 acres

8. HAZARDOUS WASTE (HW) GENERATED:

Hazardous Waste Streams and Waste Codes generated onsite based on hazardous waste manifest include the following:

Waste Adhesives		D001
Waste Aerosols		D001
Waste Petroleum Gases Liquefied		D001
Waste Environmentally Hazardous Substances	Lead	D008
Waste Corrosive Acidic Inorganic	Sulfuric Acid	D008
Hazardous Waste Solid Mercury Containing	Crushed Glass	D009
Waste Flammable Liquid	Acetone, Toluene	D001, F003, F005
Waste Solid Containing Flammable Liquid	Acetone, Toluene	F003, F005
Waste Paint Related material		D001, D035, F003, F005
Waste Flammable Liquid Corrosive	Citrus Terpene	D001, D002

9. AREAS OF REVIEW AND INSPECTION:

- Manifests / Land Disposal Restriction (LDR) Notifications – LDRs were reviewed for all waste streams. Hazardous waste manifest were reviewed for January 2013 through present and were in good condition.

Transporters	EPA ID#
A&D Environmental Services SC, LLC	SCD987598331
Lighting Resources, LLC	FLR000070565
Aerc.com, Inc. DBA Aerc Recycling Solutions	VAR000502591
Republic Env Sys, LLC	PAD982661381

TSD Facilities	EPA ID#
Ecoflo, Inc.	NCD980842132
Lighting Resources, LLC	FLR000070565
AERC.com, Inc.	PAD987367216
Trex Properties, LLC	NCD049773245
Republic Env Sys, Inc.	PAD085690592

- Weekly Inspections (HW Storage Area) – A documented log of weekly inspections at the facility's hazardous waste storage areas was available for review at the time of the inspection. Logs were reviewed for January 2013 through present. All inspection logs were up to date. **It is a reminder that per 40 CFR 265.174, the facility must inspect the hazardous waste storage area for leaks and the deterioration of containers due to corrosion.**
- Waste Minimization Plan – The facility maintains a written waste minimization plan as a component of the ISO 14001 Environmental Steward management system. The plan was last revised on December 10, 2015 and includes reduction techniques, as well as onsite and offsite recycling.
- Emergency Preparedness – The facility maintains operations of the facility in a manner to minimize the risk of fire. The facility has an internal PA system for evacuation procedures as well as fire alarms and firefighting equipment which are located throughout the facility. An automatic sprinkler system is in place that is supplied by the City of Statesville water system. The less than 180-day storage area is in close proximity to fire alarms and all employees permitted to be in the area carry mobile phones. **It is recommended that the facility develop a written procedure for maintaining immediate access to communication devices while in the <180-day hazardous waste storage area.** Emergency drills are conducted regularly and spill kits are located throughout

the facility. The emergency equipment is also inspected on a monthly basis. An outside contractor inspects fire equipment annually. Emergency arrangement letters have been submitted to local authorities. Mr. Yount explained that on January 4, 2016 there was a spill of humiseal and drip proof (thinner) waste that is managed as a hazardous waste. A temporary employee disposed of approximately 1-gallon of the D001 hazardous waste in the non-hazardous trash compactor and the material spilled onto the ground. Mr. Yount stated that Zebra Environmental responded and cleaned up the spilled material. The facility contacted Iredell County and Republic Waste and retrieved the waste material and debris from the landfill. The area around the trash compactor where the spill occurred was inspected at the time of the visit.

- Contingency Plan – The facility maintains a Contingency Plan that was last updated on January 2, 2014. The plan was not reviewed for compliance with LQG regulations. The plan list Danny Yount as the primary emergency coordinator and Tim Rutten & Allen Holland as secondary emergency coordinators. **The facility is reminded that per 40 CFR 262.34(d)(5)(ii) the names and phone numbers of emergency coordinators along with the location of fire extinguishers, spill control equipment, and fire alarms must be posted next to a telephone. The number to the fire department must also be posted next to a telephone.**
- Training – Training records were provided to demonstrate Maika Khang and Danny Yount attended the Hazardous Waste Generator Workshop offered by NCDEQ on May 21, 2015. The facility also provides training on accidents, emergencies, and safe handling. **The facility is reminded that per 40 CFR 262.34(d)(5)(ii) emergency coordinators must be trained to ensure they are thoroughly familiar with emergency procedures as listed in 262.34(d)(iv).**
- Satellite Accumulation Areas (SAAs) – There were seven SAAs observed during the inspection.
  - Paint Line – There was one 55-gallon SAA container that was closed, labeled, and grounded with a funnel attached. The facility uses an epoxy based paint with an oven.
  - Plastic Housing Auto Line – There was one 1-gallon container of waste lacquer thinner that was closed and labeled as hazardous waste.
  - GS Stator – There was one 6-gallon container that was closed and labeled as hazardous waste.
  - Large Clean Room – There was one 55-gallon container that was labeled as hazardous waste. This waste stream is managed as a D001 hazardous waste liquid. **The facility failed to manage SAA containers in the closed position when not adding or removing waste in that the lid to the container was not securely closed and was not equipped with a rubber gasket. It is recommended that the facility ground all containers used to accumulate ignitable waste.**
  - Waste Water Treatment Plant – Three separate SAAs are maintained in this area.
    - There was one 5-gallon container of broken glass by a lamp crusher that was closed and labeled as hazardous waste.
    - There was one 55-gallon container with a lamp crusher attached. The container was closed and labeled as hazardous waste. **The facility failed to accumulate hazardous waste in a container in that there were broken pieces of glass observed on the floor, on the lamp crusher container, and on top of surrounding containers.**
    - There was one 55-gallon container with a can puncturing device attached. **The facility failed to accumulate hazardous waste in a container in that there were waste spills observed on the puncturing device.**
  - Shipping/Recycling – There was one 55-gallon container located in a flammable cabinet that was grounded, labeled as hazardous waste, and closed. There was one 55-gallon container for waste aerosols cans in a separate SAA. This container labeled was becoming illegible. **It is a reminder that per 40 CFR 262.34(c)(ii) SAA containers must be clearly labeled with the words "Hazardous Waste" or other words to describe the contents. Faded, pealing, or other issues that impair the clarity of a label must be repaired to maintain compliance.**
- <180-day Hazardous Waste Storage Areas (HWSA) – Hazardous Waste is stored in the Recycled Materials Building, which is a standalone building with roll-up bay doors. At the time of inspection, there were six 55-

gallon containers, two 5-gallon containers, and one 30-gallon container of hazardous waste observed stored in the HWSA. **The facility failed to clean all spills of hazardous waste in that one 55-gallon container, dated as 10-26-2015, was observed with dried waste on the lid. The facility failed to maintain storage containers closed except for when adding or removing waste in that one 55-gallon container of waste solvent rags and waste gloves was observed with a lid that was not securely closed.** The facility should reference RCRA Online document #14826, 11/3/2011, regarding EPA's "Closed Container Guidance: Questions and Answers". **The facility failed to conduct a waste determination in that at the time of inspection, there were two containers, less than 1-gallon in size, stored in the HWSA that were identified as waste, and Mr. Yount and Ms. Khang did not know if they were hazardous.** There were two 55-gallon containers that were closed and labeled as "Non-Hazardous Waste" and dated as 1/6/2016. Mr. Yount explained that the two 55-gallon containers contained material from the January 6, 2016 waste humiseal and waste drip proof spill clean-up and that a waste determination will be conducted to ensure the waste is not ignitable. **The facility failed to conduct a waste determination in that one 55-gallon container of D001 hazardous waste clean-up materials was labeled as "Non-Hazardous Waste". It is recommended that the facility label containers of waste that are pending analysis as "Hazardous Waste Pending Analysis" and a reminder that all hazardous waste storage containers must be labeled as "Hazardous Waste".**

- Other Waste Streams – Several other waste streams were observed stored in the Recycled Materials Building next to the HWSA. There were six 55-gallon containers labeled as "Non-Hazardous Waste Contains Metal Oxides"; six 5-gallon containers labeled as "Solder Dross After Recycle Process" that were closed with no dates; and five 2.5-gallon containers labeled as "Solder Waste". The solder dross containers are discussed further in the Sold Dross Reclamation section. The facility also generated additional waste streams: WWTP filter cake sludge, Fixodine XL, E518 Adhesive, Concrete Sealer, Powder Coat, molding compound dust, and grinding swarf. **The facility must conduct waste determinations based on 40 CFR 262.11 on all waste streams. Per 40 CFR 262.40(c), the facility must maintain records of test results, waste analyses, or other determinations made in accordance with 262.11 to demonstrate the basis for the determination.**

o Solder Dross Reclamation – The facility manufactures circuit boards, which is a process that utilizes silver solder. The solder becomes contaminated with oxygen, and is scraped off as solder dross, which is managed for reclamation. The material is stored in the Recycled Materials Building until it is processed onsite to reclaim the silver solder for reuse onsite. When the facility can no longer reclaim the silver solder it is transported to Smart Metals, located in Statesville, NC, for silver recovery. There were five 2.5-gallon closed containers labeled as "solder waste" that was waiting to be processed for silver reclamation onsite and six 5-gallon closed containers labeled as "solder dross after recycle process" that were closed and waiting to be sent to Smart Metals. None of the eleven containers were dated. **The facility must demonstrate which exclusion or exemption is being claimed for the solder dross material, provide documentation to demonstrate compliance with 40 CFR 261.2 definition of solid waste requirements, as applicable including, but not limited: to speculative accumulation (261.2(c)(4)), documentations of claims that materials are not solid wastes or are conditionally exempt from regulation (261.2(f)), and sham recycling (261.2(g)) which redirects to 40 CFR 260.43 legitimate recycling of hazardous secondary materials.**

o Used Oil – The facility stores totes of used oil in a separate storage building located onsite. At the time of inspection, there were twelve 250-gallon (1000/litter) containers of used oil that were labeled as "Oil and Water". Mr. Yount explained that the oil/water material is generated by Press operations. He further explained that some of the containers would be sent off as used oil and containers with mostly water content would be sent for solidification. **The facility failed to label containers of used oil as "Used Oil" for containers that will be sent off as used oil. The facility failed to conduct a waste determination for containers that will be sent off as waste to be solidified.**

There were two 55-gallon containers of used oil located near the Press, located along a wall that were not labeled. The wall above the two containers was labeled as "Used Oil". **The facility failed to label used oil containers**

as "Used Oil".

- Universal Waste – Universal Waste is stored in the Recycled Materials Building next to the HWSA. There were six boxes of used lamps observed stored in the area. **The facility failed to label used lamp containers as "Universal Waste Lamps", "Used Lamps", or "Waste Lamps" in that at the time of inspection, all six containers were not labeled. The facility failed to maintain universal waste lamp containers in the closed position when not adding or removing from the container in that at the time of inspection, two used lamp containers were open.**

Listed below are the site deficiencies and comments noted during the Compliance Assistance Visit. After 30 days your facility is subject to a Compliance Evaluation Inspection (CEI). Any violations found during the CEI will be subject to enforcement. Prior to the CEI visit, the facility may provide documentation to demonstrate compliance with noted site deficiencies to Heather Goldman at Heather.Goldman@ncdenr.gov.

10. SITE DEFICIENCIES:

- 40 CFR 262.11 – The facility failed to conduct a waste determination.
- 40 CFR 262.34(c)(1) – The facility failed to accumulate hazardous waste in a container.
- 40 CFR 262.34(c)(1)(i) reference 265.173 – The facility failed to manage SAA containers in the closed position when not adding or removing waste.
- 40 CFR 262.34(d)(2) reference 265.173 – The facility failed to maintain storage containers closed except for when adding or removing waste.
- 40 CFR 262.34(d)(4) reference 262.34(a)(3) – The facility failed to label a hazardous waste storage container as "Hazardous Waste".
- 40 CFR 262.34(d)(5)(iv)(B) – The facility failed to clean all spills of hazardous waste.
- 40 CFR 273.13(d) – The facility failed to maintain universal waste lamp containers in the closed position when not adding or removing from the container in that at the time of inspection, two used lamp containers were open.
- 40 CFR 273.14 – The facility failed to label used lamp containers as "Universal Waste Lamps", "Used Lamps", or "Waste Lamps".
- 40 CFR 297-22(c) – The facility failed to label used oil containers as "Used Oil".

11. COMMENTS AND RECOMMENDATIONS:

- It is a reminder that per 40 CFR 265.174, the facility must inspect the hazardous waste storage area weekly (at least every seven days) for leaks and the deterioration of containers due to corrosion.
- The facility is reminded that per 40 CFR 262.34(d)(5)(ii) the names and phone numbers of emergency coordinators along with the location of fire extinguishers, spill control equipment, and fire alarms must be posted next to a telephone. The number to the fire department must also be posted next to a telephone.
- The facility is reminded that per 40 CFR 262.34(d)(5)(ii) emergency coordinators must be trained to ensure they are thoroughly familiar with emergency procedures as listed in 262.34(d)(iv).
- It is a reminder that per 40 CFR 262.34(c)(ii) SAA containers must be clearly labeled with the words "Hazardous Waste" or other words to describe the contents. Faded, pealing, or other issues that impair the clarity of a label must be repaired to maintain compliance.
- The facility must conduct waste determinations based on 40 CFR 262.11 on all waste streams. Per 40 CFR 262.40(c), the facility must maintain records of test results, waste analyses, or other determinations made in accordance with 262.11 to demonstrate the basis for the determination.
- The facility must demonstrate which exclusion or exemption is being claimed for the solder dross material, provide documentation to demonstrate compliance with 40 CFR 261.2 definition of solid waste requirements,

as applicable including, but not limited: to speculative accumulation (261.2(c)(4)), documentations of claims that materials are not solid wastes or are conditionally exempt from regulation (261.2(f)), and sham recycling (261.2(g)) which redirects to 40 CFR 260.43 legitimate recycling of hazardous secondary materials.

- It is recommended that the facility develop a written procedure for maintaining immediate access to communication devices while in the <180-day hazardous waste storage area
- It is recommended that the facility ground all containers used to accumulate ignitable waste.
- It is recommended that the facility label storage containers of waste that are pending analysis as "Hazardous Waste Pending Analysis".
- The facility should refer to the NCDEQ Hazardous Waste Section Technical Assistance Guidance page located at https://ox.deq.prod.nc.gov/about/divisions/waste-management/waste-management-permit-guidance/hazardous-waste-section-technical-assistance-education-guidance for more guidance documents, specifically, the Generator Compliance Manual. This document provides examples that will assist as a reference for compliance.

Heather Calder 2/17/2016 — By E-Mail

INSPECTOR (DATE) **FACILITY CONTACT**

ec: Danny Yount - ASMO
Brent Burch, Compliance Branch Head
Central Office Files