ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
Compliance Evaluation Inspection (CEI) Report

1) **Author of Report**

L. J. Knickerbocker
Environmental Scientist, Senior
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) **Facility Information**

Hyundai Steel America, Inc.
200 Team Member Lane
Greenville, Butler County, Alabama 36037

EPA ID Number: ALR000057331
NAICS Code: 336370
Telephone: (334) 382-4313

3) **Responsible Officials**

Mr. Tim Stewart, Safety Specialist – Hyundai
Email: [HYPERLINK "mailto:tstewart@hyundai-steel.com"]
Website: [HYPERLINK "http://www.hyundaisteelusa.com"]

Telephone: (334) 382-4313

4) **Inspection Participants**

Mr. Stewart
Ms. Paula Whiting, Environmental Engineer
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
US Environmental Protection Agency - Region IV
Ms. L. J. Knickerbocker

5) **Date of Inspection**

March 21, 2016

6) **Applicable Regulations**

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations.

7) **Purpose of Inspection**

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The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

8) Facility Description

Hyundai Steel America, Inc. (hereinafter "Hyundai Steel") supplies cut, stamped, and welded steel coil and sheet metal for automotive body parts. The facility consists of a manufacturing building that houses various cutting, stamping, and welding areas and a stand-alone used oil storage building. See Photograph #1 for an aerial view of the site.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, dated October 7, 2015) Hyundai Steel identified itself as a conditionally exempt small quantity generator of hazardous waste, a used oil generator, and a small quantity handler of universal waste.

9) Observations

On March 21, 2016, Ms. Whiting and I (hereinafter "we" or "us") arrived at the site at 9:30 a.m. and proceeded to the security gate. From there, we were directed to the front lobby, where we met Mr. Stewart. We introduced ourselves and explained the purpose of our visit. We proceeded to a conference room where we held the opening meeting and he provided background information about the site and an overview of its operations.

The site was established in 2005. It currently operates two shifts that work five days per week: the shifts are ten hours long from Monday through Wednesday and eight hours long on Thursday and Friday. There are one hundred twenty-three employees; none handle hazardous waste on a routine basis, but small amounts of spent aerosol cans are generated at the site.

The wastes handled at the site consist of the following:

- used oil generated during equipment maintenance activities,
- oil-contaminated sorbents and rags that were used to address deminimis releases from equipment or remove excess oil from metal before or after forming operations,
- spent aerosol cans, and
- spent alkaline batteries

Oil-saturated sorbents are collected by Revolutions Environmental (EPA ID number ALR000046904) every two weeks. Greer Enterprises, LLC (ALR000046581) collects the used oil and delivers it to Lesco Environmental Services (FLR000178079). Spent aerosol cans are punctured and the empty cans are recycled as scrap metal, but Mr. Stewart could not provide details regarding the management of the material removed from the cans or any other site-generated wastes aside from the used oil.

Following the opening meeting, Mr. Stewart accompanied us on the walk-through inspection.

During the walk-through inspection, we noted the following:

Welding Area

Stamped pieces of mild steel are MIG-welded to create specific shapes. Releases of lubricating oil are absorbed using spill pads, which are then placed in a 55-gallon poly drum. One drum of oil-saturated sorbents was staged in this area; it was closed, but was not marked with the words "Used Oil". See Photograph #2.

In an email received on March 30, 2016, Mr. Stewart provided documentation that the drum had been labeled.

Used Oil Storage Building

Used oil and oil-contaminated sorbents are stored in a free-standing metal building located outside the northeast corner of the main facility. We saw one open-top 55-gallon drum containing oil-saturated sorbents, four close-top 55-gallon drums, and four 350-gallon totes containing used oil, and one 55-gallon drum equipped with an aerosol can puncture unit; all of the drums and totes were staged on or in spill containment units. Eight spill containment units, one 5-gallon plastic bucket, and three plastic parts bins also held used oil, and there was a release of used oil to the floor of the building. Some of the spill containment units also held significant amounts of solids, such as oil-dry.

The tops of all four of the drums of used oil were covered with used oil.

Three of the totes and two of the drums of used oil were not closed; the openings were not capped. The drum of oil-saturated sorbents was also not closed; the lid was in place but was not secured.

One drum and one tote holding used oil were not marked with the words "Used Oil".

In an email received on March 30, 2016, Mr. Stewart provided documentation that all drums had been labeled.

One drum of used oil was severely damaged; its top and sides were bent and deformed.

The spill containment units, the plastic bucket, and the plastic parts bins were not designed to be used as containers, were not marked with the words "Used Oil", and could not be closed.

The release of used oil to the floor of the building had not been cleaned up.

The drum that was equipped with the aerosol puncture unit was labeled with the words "Universal Waste".

See photographs #3 through #19.

Re-work Area

From the used oil storage area, we returned to the main facility and went to the re-work area. Fabrication defects are corrected in this area, but little waste is generated other than oil-saturated wipes. We saw one 5-gallon self-closing container of oily wipes in the area; it was closed but was not marked with the words "Used Oil". See photographs #20.

In an email received on March 30, 2016, Mr. Stewart provided documentation that the drum had been labeled.

Maintenance Shop

After the Re-work area, we went to the Maintenance shop. Equipment repairs are accomplished in this area, as well as storage of parts and materials. Spent emergency batteries are collected in this area if needed, but none were present during this inspection. Spent aerosol cans of WD-40 and spray paint are collected in the maintenance shop until they are taken to the Used Oil storage building to be punctured. We saw one corrugated cardboard box marked with the words "Used Aerosol Cans for Disposal". The box was closed and in good condition, and was dated December 1, 2015. We did not ask Mr. Stewart to open it. See photographs #21.

In an email received on March 30, 2016, Mr. Stewart provided documentation that the aerosol cans had been transferred to a closed plastic container.

Records Review

During the records review, we requested the following documents and records:

- Hazardous waste determinations;
- Documentation of monthly hazardous waste generation;

- Documentation that all wastes are delivered to facilities that can accept them;
- Solid Waste profiles

The only records available were manifests for shipments of used oil and oil-saturated sorbents. Mr. Stewart was not aware of any Waste preapprovals or profiles and did not know what landfill the facility's waste was sent to.

10) Summary

The following areas of noncompliance were noted at the time of the inspection:

- One 55-gallon drum of used oil was in poor condition; the sides were severely deformed and the top rim was bent.
- Used oil was accumulated in devices not regulated under ADEM Division 14 chapters 5 or 6. We observed secondary containment units, plastic bins, and an open bucket all holding significant quantities of used oil.
- Three totes and three 55-gallon drums of used oil or oil-saturated sorbents were not closed.
- All containers holding used oil were not marked appropriately: three containers holding oil-saturated sorbents and two containers holding used oil were not marked with the words "Used Oil".
- Hyundai Steel failed to prevent or address releases of used oil. The tops of four 55-gallon drums and two totes were covered in oil, and there were releases of oil to the floor that had not been cleaned up.

Following the inspection, we met with Mr. Stewart for a closing meeting. We reviewed our observations, and gave him the opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* describing our observations and a *Noncompliance Warning* that addressed the areas of noncompliance noted during the inspection. We left the top copy of the form and several guidance documents with Mr. Stewart and departed the site at 12:30 p.m.

11) Signed

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

March 30, 2016
Date

12) Concurrence

Clethes Stallworth, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

March XX, 2016
Date

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Attachment - Photo Log

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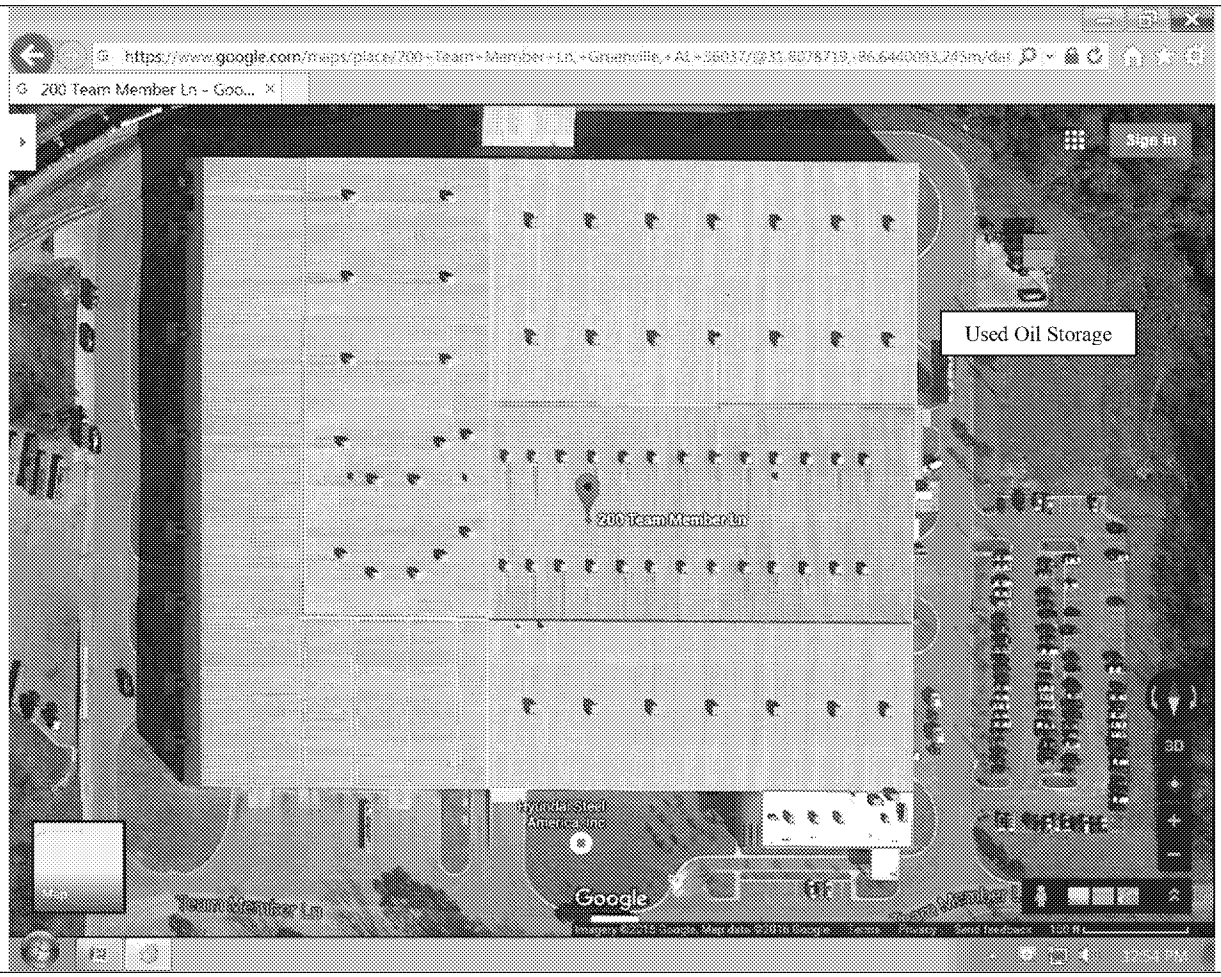
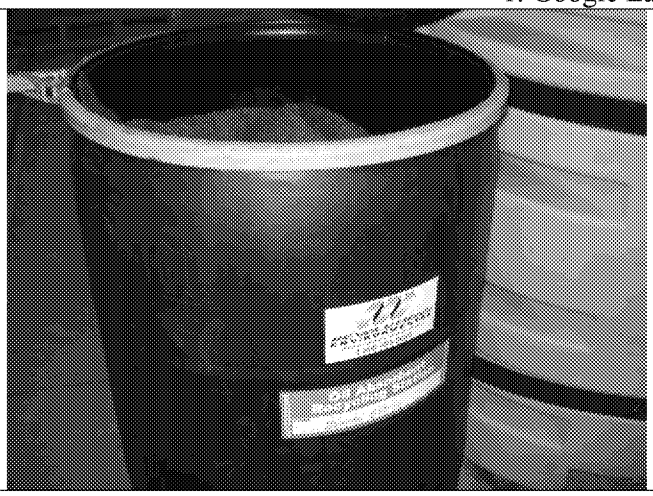
ATTACHMENT – HYUNDAI STEEL AMERICA PHOTO LOG



1. Google Earth view of site



2. Unmarked container of oil-saturated sorbents

3.

4.

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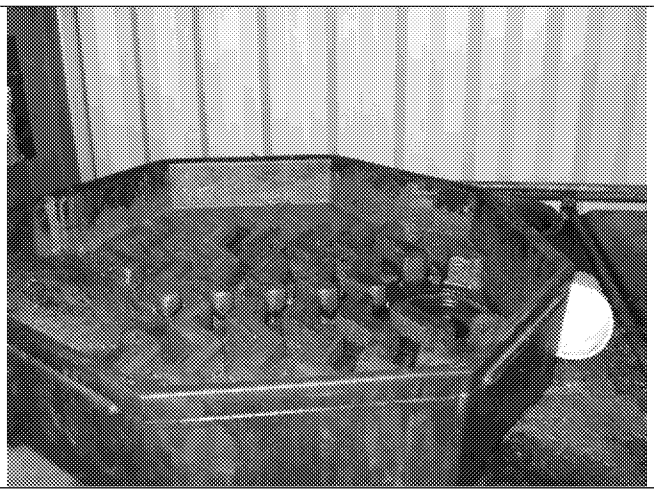

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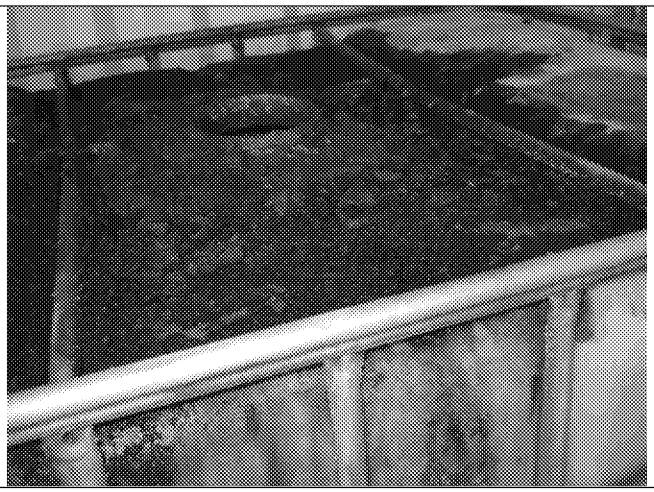

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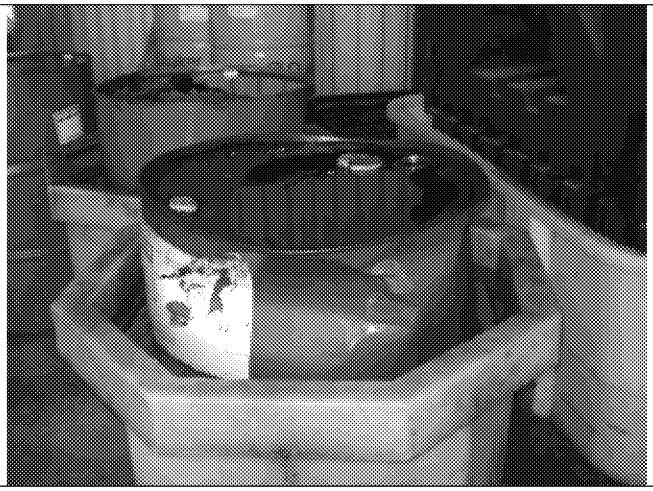
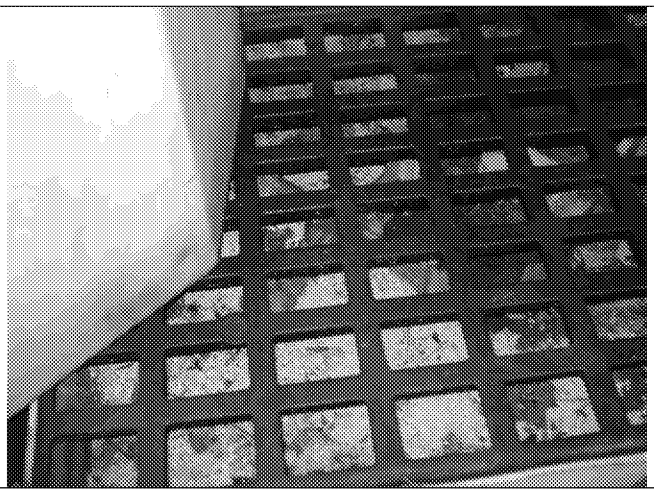


10.

11.

12.



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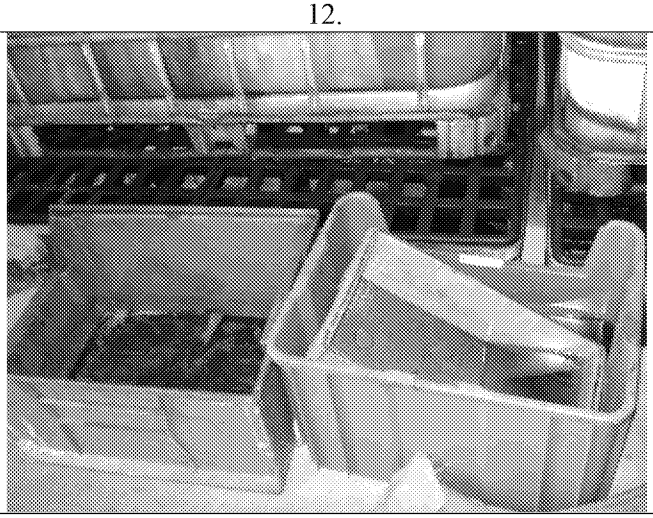
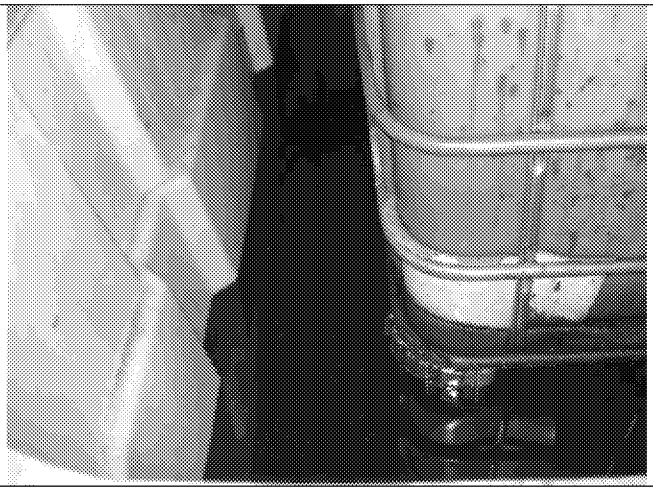


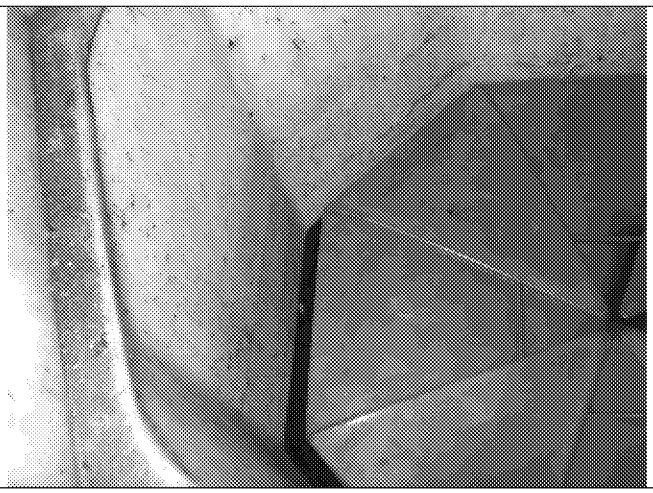
14.

15.



16.

17.



18.

19. Aerosol can puncture unit

20. Unmarked container of oil-saturated wipes

21. Spent aerosol cans awaiting puncture