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 Motor Manufacturing Alabama, LLC
700 Hyundai Boulevard
Montgomery, Montgomery County, Alabama 36105

EPA ID Number: ALR000025486
NAICS Code: 336111
Telephone: (334) 387-8888

3) **Responsible Officials**

Ms. Ursula Dreher, Environmental Specialist – Hyundai
Email: Ursula.dreher@hmmausa.com
Mr. Paul Boucard, Senior Manager, Environment / Operations Department – Hyundai
Email: Paul.Boucard@hmmausa.com
Website: www.hmmausa.com

Telephone: (334) 387-8862

4) **Inspection Participants**

Ms. Dreher
Mr. Ron Bishop, Assistant Manager, Environment / Operations Department – Hyundai
Mr. Jeremy White, Paint Process Engineer - Hyundai
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. Charmagne Boyd, ADEM – (Present on Feb. 23, 2016 only)
Mr. Drew Phillips, ADEM – (Present on Feb. 23, 2016 only)
Ms. L. J. Knickerbocker

5) **Dates of Inspection**

February 23 through 24, 2016

ED_005268_00002081-00001

6) **Applicable Regulations**

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

7) **Purpose of Inspection**

This was a joint ADEM-EPA compliance evaluation inspection to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

8) **Facility Description**

In operation since 2005, Hyundai Motor Manufacturing Alabama, LLC (hereinafter "HMMA") is an automotive assembly and manufacturing plant. The 3-million square-foot manufacturing plant resides on 1,750 acres of land and includes a stamping facility, paint shop, vehicle assembly shop, a two-mile test track and two engine shops.. The plant operates 24 hours per day, seven days per week and employs approximately 3,000 people (about 135 of whom manage hazardous waste during the performance of their job duties). HMMA currently assembles Sonata and Elantra sedans. Production of the Santa Fe Sport (utility vehicle) is scheduled to begin this summer.

For additional information about the site, refer to the August 20, 2012 compliance evaluation inspection (CEI) report ("18919 ALR000025486 101 20120829 HWTM Inspection Report"), which is available on the ADEM web page (eFile) at http://app.adem.alabama.gov/eFile/.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, received at the Department on July 29, 2015), HMMA identified itself as a large quantity generator of hazardous waste, a large quantity handler of universal waste batteries and lamps, and a used oil generator.

9) **Observations**

On February 23, 2016, Ms. Whiting, Ms. Boyd, Mr. Phillips and I (hereinafter "we" or "us") arrived at the site at 9:10 a.m. and proceeded to the reception area, where we met Mr. Ron Bishop. We introduced ourselves and explained the purpose of our visit. We proceeded to a conference room where we were joined by Ms. Dreher. In the ensuing opening meeting, Ms. Dreher and Mr. Bishop provided background information about HMMA and an overview of its operations. See Photograph #1 for an overview of the plant.

Following the opening meeting, Ms. Dreher accompanied us on the walk-through inspection.

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

Paint Shop

Flammable storage/ containment cabinets served as 90-day hazardous waste storage areas in the Spot Repair, Topcoat Two, and Contractor Storage areas. In the cabinet located in the Spot Repair area, there were two 55-gallon drums containing solvent-saturated absorbents, wipes, and personal protective equipment (PPE). Both drums were closed and labeled with the required information. The accumulation start dates were January 11, 2016 and February 16, 2016. The cabinet was kept locked, and the appropriate warning/security signs were posted.

In the cabinet located in the Topcoat Two area, there was one 55-gallon drum of solvent-saturated absorbents, wipes, and PPE. It was closed, labeled with the required information, and dated February 20, 2016. The cabinet was kept locked and was equipped with the appropriate warning sign.

In the cabinet located in the Contractor Storage area, there was one 55-gallon drum of solvent-saturated absorbents, wipes, and PPE; it was closed, labeled with the required information, and dated December 13,

2015. The cabinet was kept locked and was equipped with the appropriate warning sign. In addition, there were two 55-gallon drums of used oil and one 55-gallon drum containing oil-contaminated sorbents staged on a spill containment pallet. All containers were closed and labeled with the words "Used Oil".

Two 30-gallon tanks known as "purge pots" are located beneath the two paint lines. These tanks collect a mixture of hazardous waste purge solvent and paint solids from the painting operation, each time the paint guns are purged (e.g., when the paint color is changed). The purge mixture is circulated in the tanks to prevent solidification, and then piped to two 55-gallon drums located in the Mix Room. The purge pots were labeled with the words "Hazardous Waste" and the applicable EPA hazardous waste numbers. Some potential leak points appeared to be tagged but not all. Ms. Dreher said she believed the tanks are managed under ADEM's Air Program rather than under Subpart BB, but she was not sure. See Photograph #2 through Photograph #7.

[Note: A post-inspection review of Department records and an informal discussion with the Air Program's permit writer for HMMA revealed that in 2014 the Department issued to HMMA a Title V (Major Source) Operating Permit, which incorporates air emission control requirements found in CFR Part 61 and 63. RCRA Section 1006(b) requires that RCRA standards be consistent but not duplicative of Clean Air Act (CCA) standards. Equipment operated with air emission controls in accordance with CCA requirements under 40 CFR Parts 60, 61, and 63 are exempt from Subpart BB requirements, provided the equipment is operated, monitored and repaired in accordance with an applicable CAA standard, and appropriate records are kept to that effect.]

The Solvent Area within the Mix Room is used as a 90-day accumulation area and a universal waste accumulation area. In this area, all containers are staged on secondary containment pallets and dated as soon as they are put into service. Ms. Dreher said that this practice ensures HMMA never exceeds the 90-day accumulation period. The following 55-gallon drums were present in the Solvent Area:

- Two satellite accumulation area (SAA) containers. The first was fitted with a latching funnel and held spent solvent; the second was fitted with a latching lid and held solvent-saturated absorbents, wipes, and personal protective equipment (PPE). Both were closed and labeled with the required information. The accumulation start dates were January 15, 2016 and January 29, 2016.
- Two additional 55-gallon drums were open and receiving solvent waste piped in from the paint lines. These drums are managed as 90-day containers and were labeled with the required information and dated February 22, 2016.
- Eleven full 55-gallon drums of spent solvents and solvent-contaminated solids. All containers were closed, labeled with the required information, and dated, although two drums had to be turned so that the dates were visible. The earliest date on these containers was February 5, 2016.
- One corrugated cardboard box of universal waste fluorescent lamps was present in the area designated for universal waste. The box was closed, in good condition, and marked with the words "Universal Waste Lamps". This box was dated January 2, 2016.

The spill kit located adjacent to the 90-day accumulation area did not contain all the equipment shown on the list that was taped to the lid of the kit. An inspection log posted beside the kit indicated that it was fully equipped on February 22, 2016. Per Ms. Dreher, employees frequently remove absorbent pads from the kit to mop up water leaks. She contacted the responsible employee and had him restock the kit that same day.

Welding Maintenance Shop

This area is primarily used for parts storage and repairs to HMMA's welding equipment. There was one 55-gallon used oil container and one 55-gallon SAA container with a latching lid; this drum held spent aerosol cans. Both containers were labeled and the SAA container was dated January 28, 2016. The used oil container had to be turned to see the "Used Oil" label.

Stamping Maintenance Shop

This area is used to repair and maintain HMMA's stamping presses. We observed one 55-gallon drum of used oil and one 55-gallon SAA container with a latching lid that held spent aerosol cans. Both containers were labeled and the SAA container was dated December 29, 2015.

General Assembly

This plant has multiple areas that generate hazardous waste and used oil.

In the Beta Seal Area, we observed two 55-gallon SAA drums. The first, dated January 19, 2016, held waste Beta Seal, a flowable sealant that is used to seal leaks, adhere weather stripping, and deaden sounds. The second, dated February 20, 2016, held spent absorbents, PPE, and aerosol cans. Both were closed and labeled appropriately. There was also an aerosol puncture device in this area.

In the PD Heavy Repair 90-day Area, there were four closed, labeled and dated 55-gallon drums containing hazardous waste, one each of spent windshield wiper fluid, waste fuel, spent lacquer thinner, and spent rags and filters. The earliest recorded date was January 28, 2016. The drums holding the windshield wiper fluid and waste fuel were equipped with latching funnels; the drum that held the spent rags and filters had a lockable lid, while the spent lacquer was in a closed-top drum. Also in this area were two 55-gallon drums holding used oil and two rolling catch containers; according to Ms. Dreher, the oil in the catch containers was still potentially usable product.

In the storage area adjacent to PD Heavy Repair, there were three additional 55-gallon drums holding used oil, oil-contaminated rags, and spent oil filters. All containers were closed and labeled appropriately. The spill kit located in this area lacked some of the listed contents. It was restocked by the end of the day.

In the General Assembly Maintenance Shop, we observed two boxes of universal waste lamps: one box contained 4-foot fluorescent light bulbs and the other box contained 8-foot fluorescent light bulbs. The boxes of 4-foot and 8- foot fluorescent light bulbs were dated February 1, 2016 and September 29, 2015, respectively. Both boxes were in good condition, closed, and properly marked.

In this same area, there was one 5-gallon SAA container (a self-closing fire-proof can) holding spent aerosol cans. The SAA container was properly marked but was over filled to the point that the lid could not close. See Photograph 8.

Engine Shop One

In the Engine Shop One 90-day Area, there was one 55-gallon drum holding used oil and one flammables containment cabinet that held one 55-gallon drum of spent aerosols. Both containers were in good condition, closed, and properly labeled. The hazardous waste container was dated January 1, 2016. The cabinet was locked and marked with the appropriate warning signs.

We observed several 55-gallon open-top drums with latching lids in multiple areas throughout Engine Shop One, especially on the cylinder block line. These drums were used to collect oil-saturated wipes and absorbents. All were appropriately labeled and in good condition. At two locations (J8 and G8), the containers were not closed. At location J8, the latch ring could not be engaged to close the container. At location G8, the container was over-filled, and the lid could not be closed. See Photograph 9 and Photograph 10.

Engine Shop Two

Engine Shop Two is similar in layout and function to Engine Shop One. It has one 90-day accumulation area. In addition, there are multiple containers designated to collect used oil, oil-contaminated solids , and SAA containers to accept solvent-contaminated waste and spent aerosol cans staged throughout the

building.

In the 90-day accumulation area, the following full containers were present:

- One 55-gallon drum holding spent aerosols- This container was in good condition, closed, labeled appropriately, and dated January 26, 2016.
- One fiber drum containing universal waste lamps- It was in good condition, closed, labeled appropriately, and dated September 2, 2015.
- One 55-gallon open-top drum of used oil filters- It was in good condition, closed, and labeled appropriately.

Two additional 55-gallon drums in that area were open and receiving waste from the used oil skimmer. Both were appropriately marked and in good condition.

On the Crank Line, one open top 55-gallon drum of used oil absorbents was properly marked but could not be closed due to a deformed latching lid that did not make contact with the rim of the drum.

On the Cylinder Block line, there was one open top 55-gallon drum of used oil absorbents; the drum was properly marked, but the latching lid had been left open. No employees were in the vicinity.

At the break area, one 5-gallon plastic SAA container for spent aerosols cans did not have a lid. In addition, several holes had been drilled in the bottom of the container "to prevent employees from using it as a bucket", according to the area supervisor. This container was removed from use during the inspection, and the contents were added to the aerosol drum in the 90-day accumulation area. See Photograph 11 through Photograph 15.

Car Crush Area

In the Car Crush 90-day accumulation area, there were three 55-gallon drums holding a mixture of water and gasoline and two 55-gallon drums holding fuel pumps. All were in good condition, properly labeled, and dated. The earliest accumulation start date was January 20, 2016.

Records Review

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

- Hazardous Waste (HW) manifests;
- Land disposal restriction notices;
- Hazardous waste determination;
- Solid waste profiles;
- Documentation of monthly hazardous waste generation ;
- Written Waste Minimization plan;
- Weekly HW storage area inspection logs;
- Written description of the HW management and emergency response training program;
- Training requirements for all HW management-related jobs;
- Documentation of initial HW management training and annual refresher/update;
- Job titles and job descriptions for all HW workers – with the names of employees filling each job;
- Contingency plan;
- Documentation of arrangements with police, fire, and emergency responders;
- Notice to local hospitals; and
- Notice to local branch of ADEM's Field Operations Division.

No issues were noted during the document review.

10) Summary

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

- Two spill kits were not stocked according to HMMA's internal guidance standards.
- One SAA container was not closed; the container was over-filled and could not be closed.
- One SAA container lacked a lid and could not be closed due to holes drilled in its base.
- Four containers holding used oil contaminated sorbents were not closed.

Following the inspection, Ms. Whiting and I met with Ms. Dreher, Mr. Bishop, and Mr. Paul Boucard (Senior Manager - Head of Department, Environment/Operations at HMMA) for a closing conference. We reviewed our observations, and gave plant personnel an 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. Mr. Boucard reviewed, signed, and accepted the aforementioned documents on behalf of HMMA. We concluded the closing conference and departed the site at approximately 4:15 pm (February 24, 2016).

11) Signed

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

March 11, 2016
Date

12) Concurrence

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

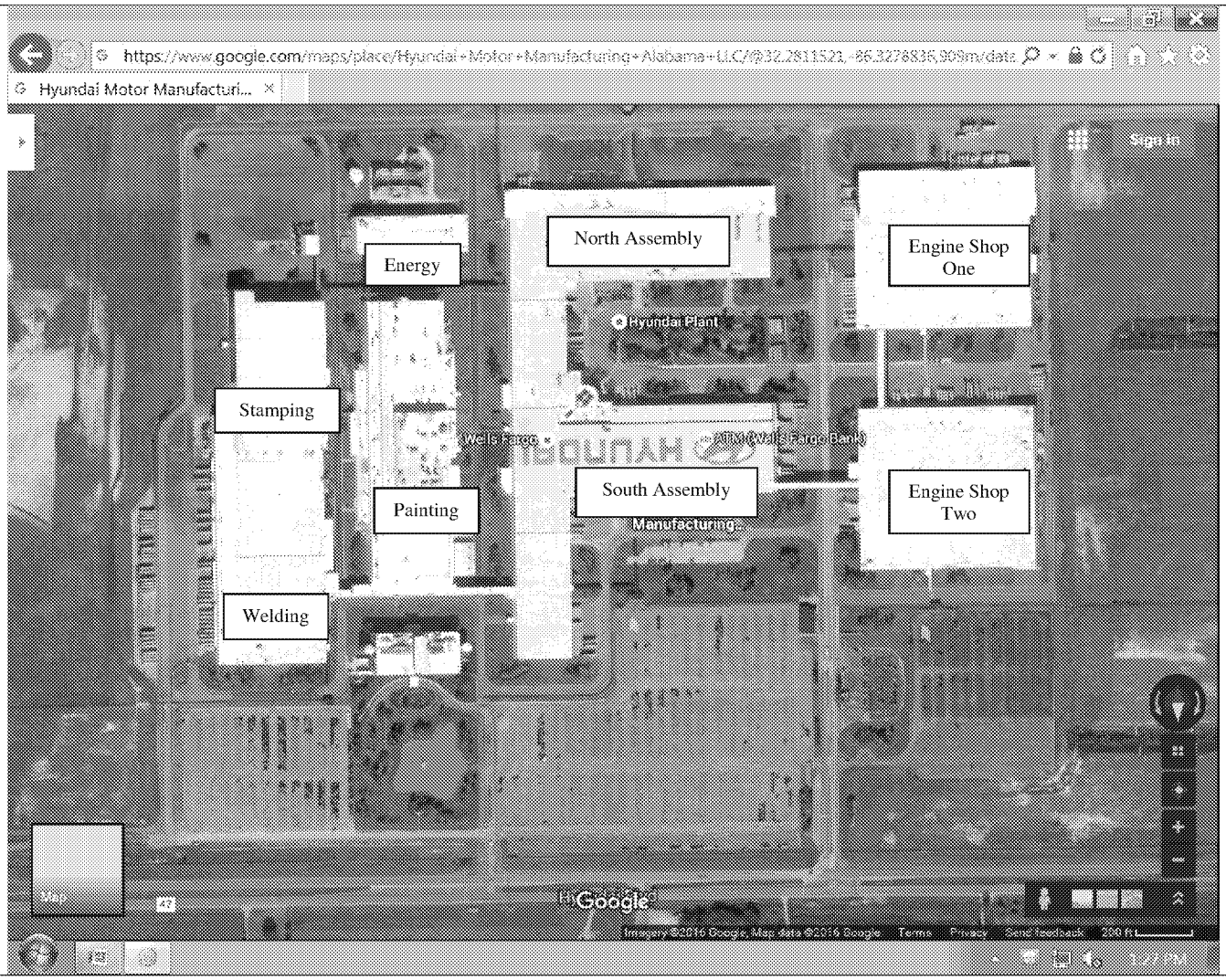
March 11, 2016
Date

Attachment - Photo Log

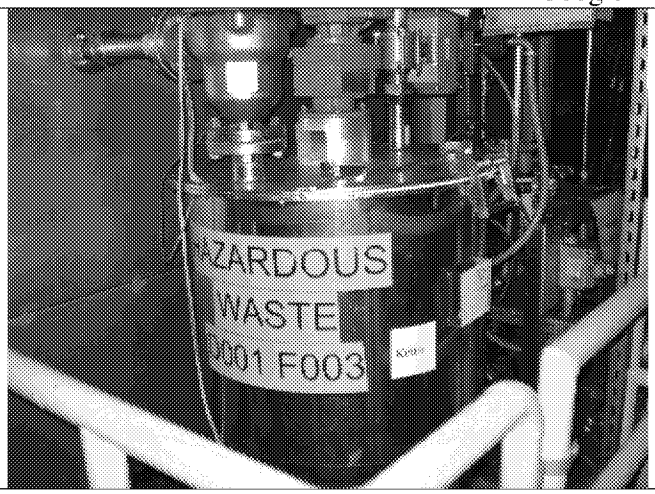
18919 ALR000025486 101 20160311 HWTM

ED_005268_00002081-00006

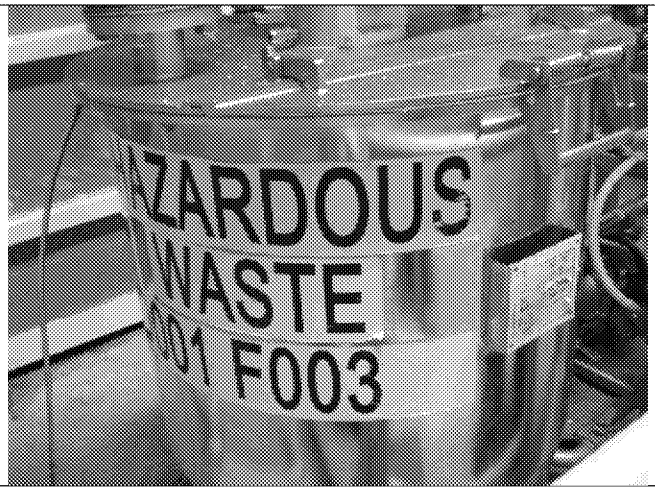
ATTACHMENT – HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC PHOTO LOG



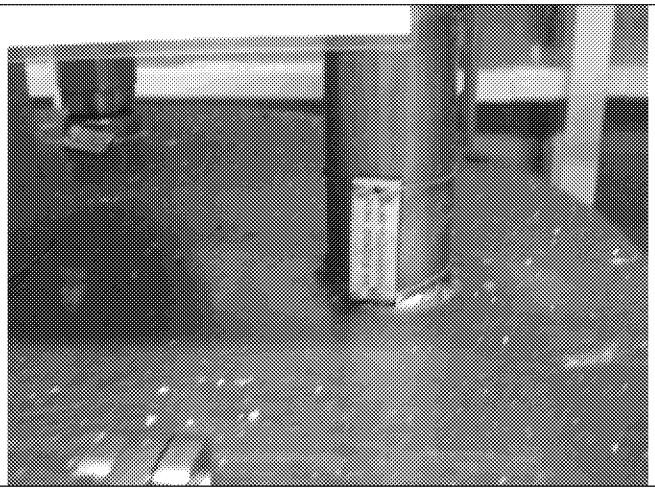
1. Google Maps view of site



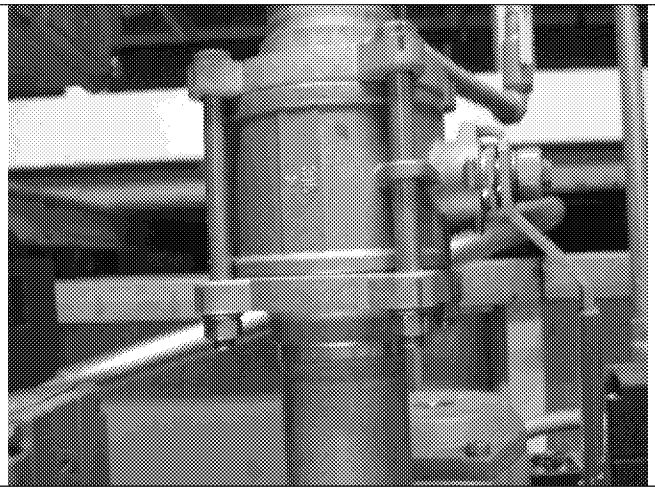
2. Purge Pot 1



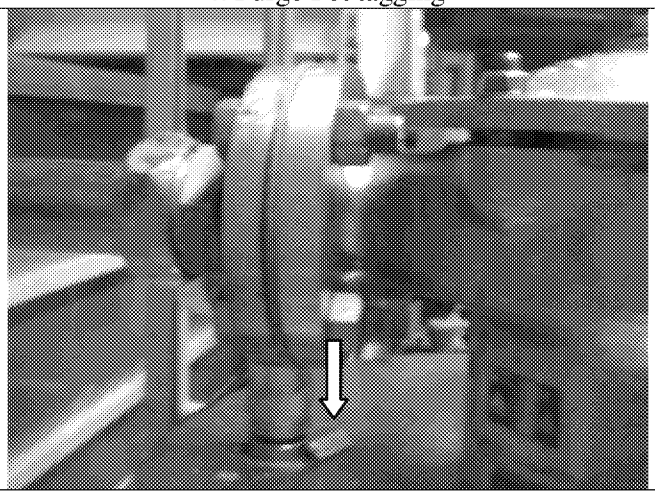
3. Purge Pot 2



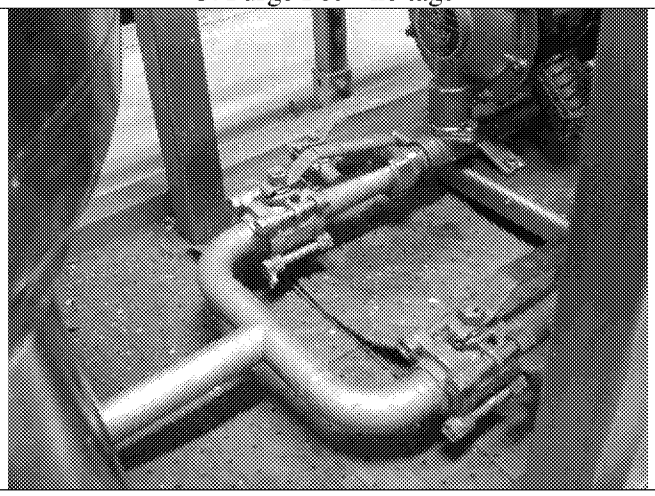
4. Purge Pot tagging



5. Purge Pot – no tags

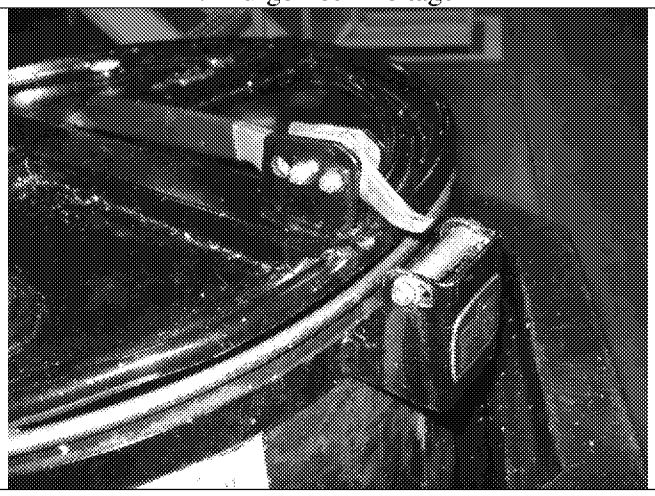


6. Purge Pot – one tag is visible



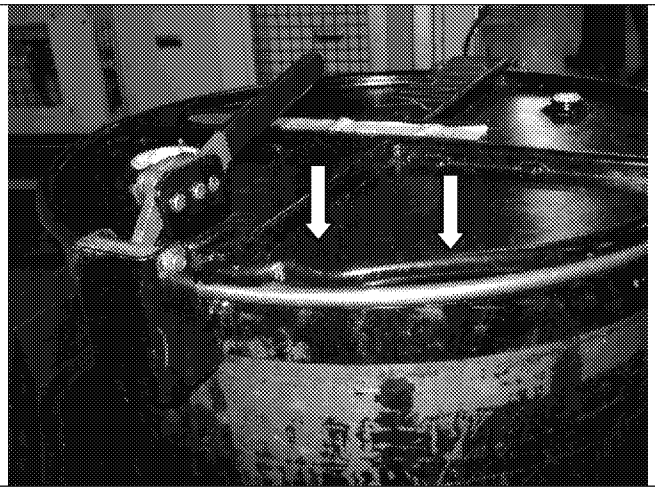
7. Purge Pot – no tags

8. General Assembly Maintenance Shop – open SAA



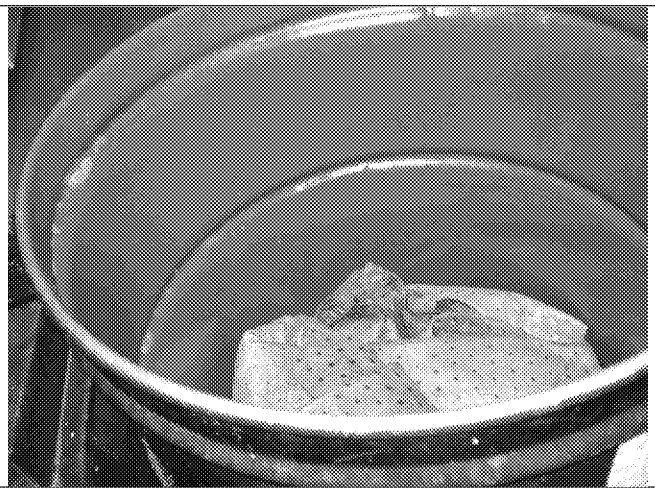
9. Engine One J8 – open UO container

10. Engine One G8 – open UO container

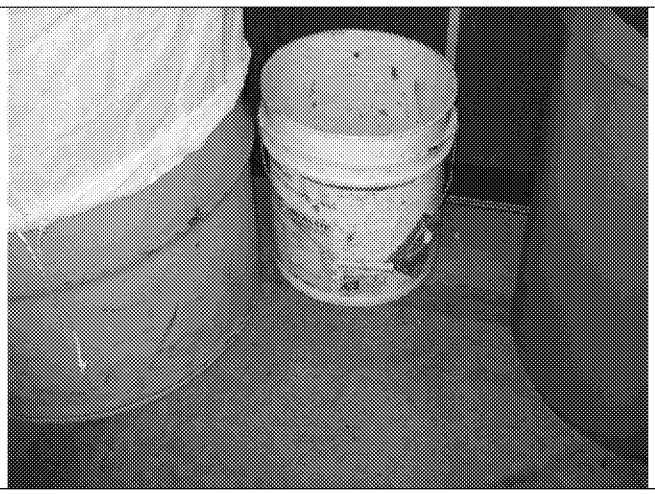


11. Engine Two Crank Line – UO container w/damaged lid

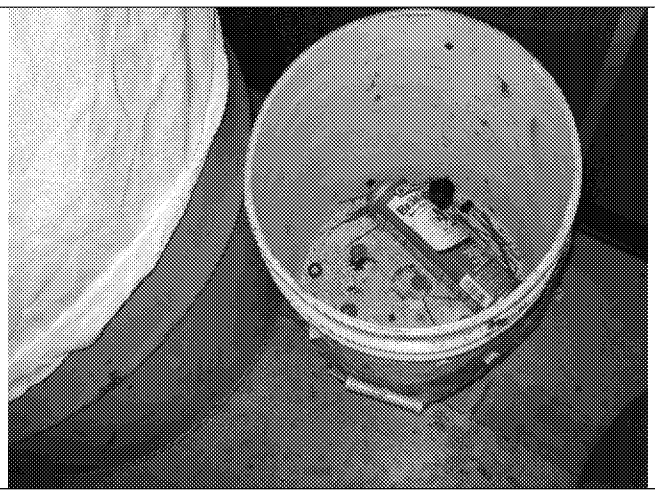
12. Engine Two Cylinder Block Line – UO container open



13. Engine Two Cylinder Block Line – same UO container



14. Engine Two – Aerosol SAA



15. Engine Two – Aerosol SAA