ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)

Compliance Evaluation Inspection (CEI) Report

1) Author of Report

Bailee Dykes
Environmental Scientist
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Mesker Door, LLC (Mesker)
3440 Stanwood Blvd. NE
Huntsville, (Madison County), Alabama 35811

EPA ID Number: ALR000003236
NAICS Code(s): 332321, 33299

3) Responsible Official(s)

Mr. Bradley Chandler – EHS & Electrical Coordinator
Telephone: 256-428-2312
Email: [HYPERLINK "mailto:bchandler@meskergroup.com"]

4) Inspection Participant(s)

Mr. Bradley Chandler – Mesker
Mr. Emanuel Sledge, Maintenance – Mesker
Mr. Jeff Parker, Maintenance – Mesker
Mr. Ben Jeglum – Mesker
Ms. Paula Whiting, Environmental Engineer – U.S. Environmental Protection Agency
Ms. Bailee Dykes, Environmental Scientist – ADEM

5) Date of Inspection

March 15, 2017

6) Applicable Regulations

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

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ADEM

7) Purpose of Inspection

The purpose of this inspection was to determine compliance with all applicable requirements of the Hazardous Waste Program regulations.

8) Facility History & Description

Mesker, a manufacturer of steel doors and door frames, has been in operation at its current location since 1996. Both items are fabricated from rolled steel using a series of presses, punches, and conveyors. Door frames are painted using a flow coating process. The doors and frames are washed with a ZP3-zinc-based process to get the oil and contaminants off of the steel. The doors are painted with a water-based paint by an automatic paint booth. Sensors indicate the height and width of the door to be painted in the automatic sprayers. Once the doors are painted, they are sent to the frame machining area where lock boxes, hinges, etc. are welded to the doors. The approximate 250,000 square foot facility (situated on five acres), operates three eight hour shifts five or six days a week. Mesker currently employs 210 people. The facility last submitted a *Notification of Regulated Waste Activity* (ADEM Form 8700-12, received by the Department on March 12, 2016) identifying itself as a conditionally exempt small quantity generator of hazardous waste and a used oil generator.

9) Observations

At approximately 8:30 a.m. a representative of the U. S. Environmental Protection Agency (Ms. Whiting), and I hereinafter "we" or "us" arrived at the facility and were greeted by Mr. Bradley Chandler. According to Mr. Chandler, the facility contact listed on the ADEM Form 8700-12 is no longer employed at Mesker. At that time, we identified ourselves and explained the purpose of the inspection. According to Mr. Chandler, the facility generates the following wastes: scrap steel, paint waste from paint booth, paint waste filters, and paint waste from the flow coat process that is all water-based paint. Following the opening conference, Mr. Chandler guided us on a walk-through inspection of the facility, noting the following areas:

Maintenance Area

First, Mr. Chandler escorted us to the Maintenance Area. In this area, we observed several aerosol cans that were discarded in the trash not punctured (see Photograph #1). No other areas of concern were noted in the Maintenance Area.

Compressor Room

Next, Mr. Chandler escorted us to the Compressor Room area. In this area, we observed a Safety Kleen Systems solvent parts washer (see Photograph #2). The parts washer was observed not connected and no longer in use at the time of the inspection. No areas of concern were noted in this area at the time of the inspection.

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Paint Booth Area

Next, Mr, Chandler escorted us to the Paint Booth Area. In this area, we observed one metal yellow fireproof cabinet that contained aerosol cans for touch up paint jobs and degreasers. In the same area staged on a metal shelf, we observed a plastic cup of paint nozzles for the automatic spray booth soaking in solvent (see Photograph #3). According to Mr. Ben Jeglum, paint line lead, the paint filters in the front of the paint booth are changed three times a week and the filters in the back are changed every two weeks when a peel coat is done. He also mentioned that a water-based paint is used often and a butyl cellosolve is occasionally used. A water flush is also conducted when a new paint is used and when the facility switches to a new vendor. The liquid waste is stored below in the Paint Kitchen and is picked up by Safety Kleen Systems, Inc. (TXR000081205). According to Mr. Chandler and Mr. Jeglum, the paint used at Mesker is non-hazardous, but a hazardous waste determination has not been conducted.

Paint Kitchen

Next, we were escorted below to the Paint Kitchen. In this area, we observed one plastic 55-gallon drum of water with a hose connected to two 5-gallon containers designated for discarded water (see Photograph #4). This system is the water flush from the Paint Booth Area. Once the discarded water from the 5-gallon containers are full, they are then emptied into a 55-gallon drum of liquid waste (see Photograph #5). In this area, we also observed an aerosol can discarded in the garbage can designated for the Paint Kitchen Area (see Photograph #6).

Flow Coat Process

Next, we were escorted to the Flow Coat Process area. In this area, a holding tank pumps fresh paint that is applied to the doors staged on the assembly line. According to Mr. Jeglum, the pump system is flushed out every two weeks. The paint in this area is recycled, approximately 150 gallons a month. The spray nozzles for applying the paint are re-used and the galvanized piping is replaced and disposed of with the scrap metal. In this area, we observed two 55-gallon drums of liquid waste in the Flow Coat Process area waiting to be moved to the storage area. The two 55-gallon drums were not labeled or dated (see Photograph #7).

Wash Line Area

Next, we were escorted to the Wash Line Area. A conveyor carries the parts (door skins and frame pieces) into the first stage of the wash line which is heated to around 90 degrees and contains an additive chemical, ZP3 to remove dirt and oil from parts. The water and sludge from stage one is pumped out about every 12-18 months by Safety-Kleen Systems and are handled accordingly. No hazardous waste determination has been conducted on the sludge. The stage two has no chemicals added to it, but residual is carried over on each part from stage one. Stage three is strictly a clean water rinse. In this area, near the stage one wash line, we observed an oil skimmer connected to a 250-gallon tote containing used oil and one 55-gallon drum of used oil in the same area. Both the drum and tote were not labeled with the words "Used Oil" (see Photograph #8) and the tote was not closed (see Photograph #9).

Wastewater Treatment System

Next, we were escorted to the Wastewater Treatment System. According to Mr. Chandler, periodically, stage two and stage three wash lines are drained into a holding tank and then to a filtered reclaimed tank where the water is cycled through a sock type filter using caustic soda to the balance the pH to around 9.4 or 9.6 before being sent to the city sewer system. According to Mr. Chandler, the reclaimed tank filters are changed and disposed of in the trash. No hazardous waste determination has been conducted on the filters.

Chemical Storage Room

Last, we were escorted to the Chemical Storage Room. In this area, we observed the following: one 55-gallon drum containing floor waste, one 55-gallon drum containing partial waste, five 55-gallon drums containing liquid paint waste, two 55-gallon drums containing an unknown material, one 55-gallon drum containing waste oil, and two 55-gallon drums of bad paint. According to Mr. Chandler, the 55-gallon drum labeled with the words "Floor Waste" is mop water. The date was not eligible on the drum (see Photograph #10). The 55-gallon drum containing partial waste was approximately half full, labeled with the words "Waste Partial", marked with "3/6/17" for an accumulation start date, and not closed (see Photograph #11). The five 55-gallon drums containing liquid waste, mop water, or waste water were all marked with the words "Liquid Waste", "Waste Water", or "Mop Water", closed, and marked with "2/27/17, 3/1/17, 3/6/17, 3/6/17, and 3/7/17" for accumulation start dates (see Photograph #12). The one 55-gallon drum containing oil was labeled with the words "Waste Oil", instead of "Used Oil" (see Photograph #13). The two 55-gallon drums of bad paint were both labeled with the words "Bad Paint/Being Returned" and dated "1/26/17" (see Photograph #14). The remaining two 55-drums were not marked or labeled to identify the contents inside or dated.

In this area we also observed, six cardboard boxes of 4-foot used fluorescent lamps staged on a shelf at the back of the Chemical Storage Room, two 8-foot boxes of used fluorescent lamps, and three used 8-foot fluorescent lamps not in container staged in the corner of the room (see Photograph #15 and #16). None of the boxes were labeled with the words "Universal Waste" or marked with an accumulation start date. Five of the six-foot boxes and both of the 8-foot boxes of fluorescent lamps were observed open during the inspection. We also observed one 55-gallon drum containing fluorescent bulb waste and one blue storage bin containing bad ballasts observed under the shelf (see Photograph #17). The 55-gallon drum was labeled with the words "Fluorescent Bulb Waste", but not closed or marked with an accumulation start date. The storage bin was labeled with the words "Bad Ballasts" and not marked with an accumulation start date.

Records Review

After the walk-through inspection of the facility, Mr. Chandler provided us with the following documents:

- 2016-2017 Safety Training
- Safety Data Sheets

- Bill of Lading/Manifests

As a result of the records review, the following items were noted:

1. Bill of Ladings/Manifests indicate that Safety-Kleen Systems, Inc. (TXR000081205) transport Non DOT Regulated (2-Butoxyethanol, Titanium Dioxide), Non – Regulated Liquid (Water Based Paint and Absorbent), and Non DOT Regulated Material (Used Oil) to Clean Harbors Chattanooga, LLC (TND982141392).

Summary

This inspection was performed to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code. During the inspection, the following areas of concern or potential noncompliance were noted:

1. Spent aerosol cans disposed of in various trash cans throughout the plant not punctured;
2. No hazardous waste determinations performed on the 55-gallon drums of liquid paint waste, the 55-gallon drums of floor waste, the sludge from Stage 1 wash line area, and reclaimed tank filters;
3. One 55-gallon drum and one 250-gallon tote containing used oil not labeled with the words "Used Oil" staged at Stage 1 wash line area;
4. One 55-gallon drum labeled with the words "Waste Oil" staged in the Chemical Room was not labeled with the words "Used Oil";
5. Three 5-gallon containers and one small pan staged in the Oil Shed containing used oil were not closed or labeled with the words "Used Oil";
6. Six cardboard boxes of 4-foot used fluorescent lamps not marked with an accumulation start date or labeled with the words "Universal Waste";
7. Five cardboard boxes of 4-foot used fluorescent lamps not closed;
8. One 55-gallon drum labeled "Fluorescent Bulb Waste" was not marked with an accumulation start date, not labeled with the words "Universal Waste", and not closed;
9. One storage bin containing "Bad Ballasts" not dated or labeled with the words "Universal Waste";
10. Two 8-foot cardboard boxes of used fluorescent lamps were not closed, marked with accumulation start dates, or labeled with the words "Universal Waste"; and
11. Three 8-foot used fluorescent lamps were not containerized.

Following the records review, we conducted a closing conference with Mr. Chandler to discuss our observations. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report*, indicating observations noted during the inspection. Mr. Chandler reviewed, signed, and accepted the report on behalf of Mesker. We concluded the closing conference and departed the site at approximately 1:45 pm.

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10) **Signed**

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

4/21/2017
Date

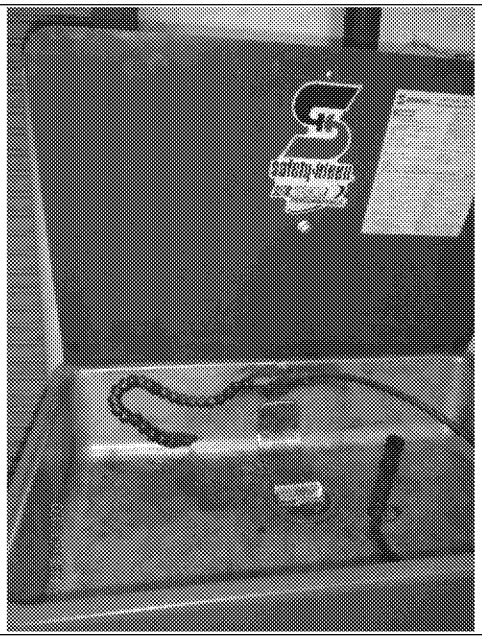
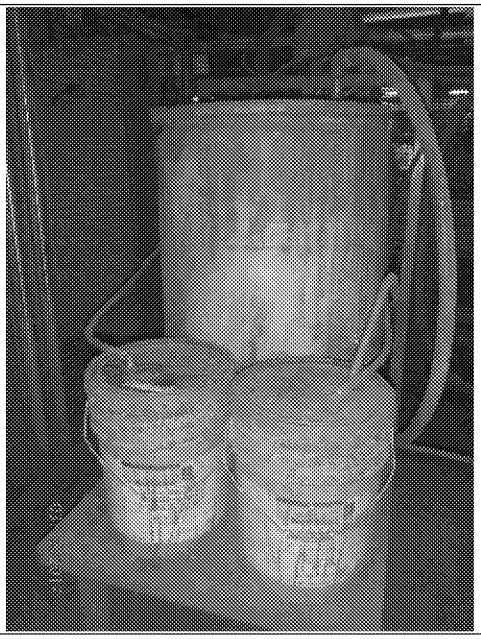
11) **Concurrence**

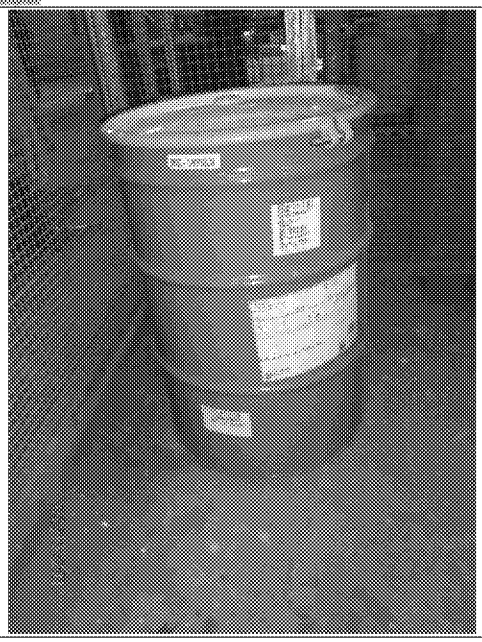
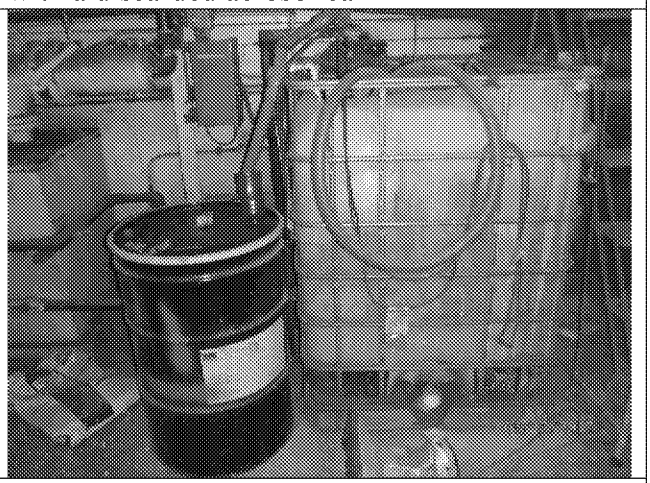
Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

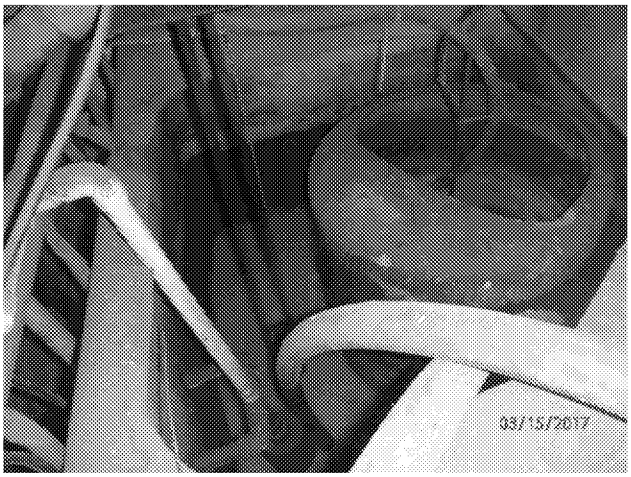
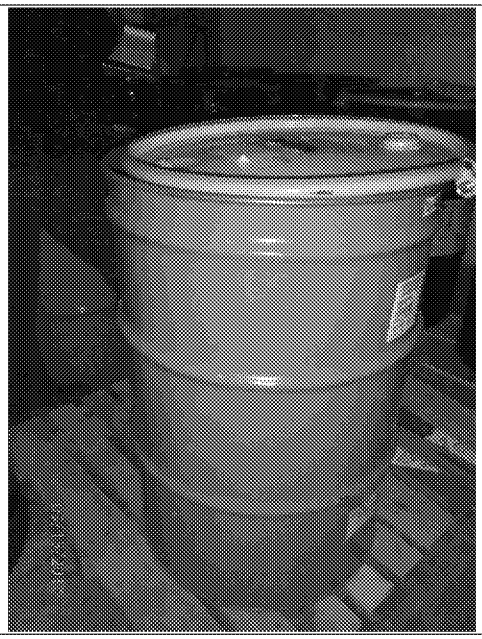
4/21/2017
Date

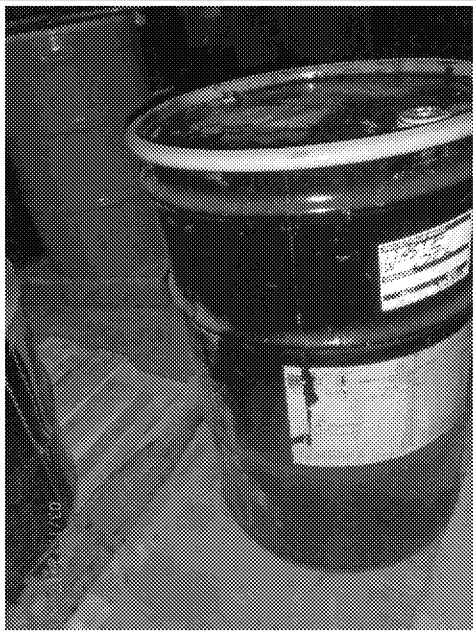
ADEM

PHOTO LOG

	
Photograph # 1: Maintenance Shop – Aerosol cans discarded in the garbage	Photograph#2: Compressor Room – Safety Kleen Systems part washer
	
Photograph #3: Paint Booth – Cup of nozzles soaking in solvent	Photograph #4: Paint Kitchen – Liquid waste collection containers and clean water drum

	
Photograph #5: Paint Kitchen – Liquid waste drum	Photograph #6: Paint Kitchen – Garbage can with a discarded aerosol can
	
Photograph #7: Flow Coat Process – Two drums of liquid waste, not labeled or dated	Photograph #8: Stage 1 – Oil skimmer tote and used oil drum not labeled

	
Photograph #9: Stage 1 – Oil skimmer tote not closed	Photograph #10: Chemical Storage – 55-gallon drum of floor waste
	
Photograph #11: Chemical Storage – 55-gallon drum labeled “Partial Waste” and dated “3/6/17”	Photograph #12: Chemical Storage – waste drums

	
Photograph #13: Chemical Storage – waste oil	Photograph #14: Chemical Storage – Bad paint drums
Photograph #15: Chemical Storage – Universal waste lamps	Photograph #16: Chemical Storage – Universal waste lamps

Photograph #17 – Chemical Storage – Universal waste lamp drum and spent ballast container