UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 24 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Randle Cunningham
General Manager
Valmont Coatings Inc. dba Valmont Birmingham Galvanizing
475 Dietrich Road
Steele, Alabama 35824

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Valmont Coatings Inc. dba Valmont Birmingham Galvanizing
EPA ID # ALR000013490

Dear Mr. Cunningham:

On June 24, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at Valmont Coatings Inc. dba Valmont Birmingham Galvanizing located at 475 Dietrich Road, Steele, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report, which indicates that deficiencies of RCRA were discovered during the inspection. A copy of this report has been forwarded to the Alabama Department of Environmental Management for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella

Alan A. Annicella
Chief
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Enclosure

cc: Jonah Harris, Industrial Hazardous Waste Program, ADEM Land Division

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JUL 24 2019

Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Valmont Coatings Inc. dba Valmont Birmingham Galvanizing
EPA ID Number: ALR000013490

Dear Mr. Crockett:

On June 24, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at the Valmont Coatings Inc. dba Valmont Birmingham Galvanizing facility, located at 475 Dietrich Road in Steele, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report, which indicates that deficiencies of RCRA were discovered during the inspection. Please follow-up with Valmont Coatings Inc. dba Valmont Birmingham Galvanizing to ensure the deficiencies have been addressed.

If you have any questions regarding this matter, please contact Paula Whiting, of my personnel, by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella

Alan A. Annicella
Chief
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Enclosure

RCRA Inspection Report

1) Inspectors and Authors of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Valmont Coatings Inc. dba Valmont Birmingham Galvanizing
475 Dietrich Road
Steele, Alabama 35824
St. Clair County
EPA ID: ALR000013490

3) Responsible Official

Randle Cunningham, General Manager

4) Inspection Participants

Randle Cunningham	Valmont Coatings Inc. dba Valmont Birmingham Galvanizing
James McDonough	Valmont Coatings Inc. dba Valmont Birmingham Galvanizing
Jonah Harris	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

June 24, 2019 at 11:30 a.m. CDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 *et seq.*; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program;

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however, for ease of reference, the federal citations will follow in brackets.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) **Purpose of Inspection**

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Valmont Coatings Inc. dba Valmont Birmingham Galvanizing, EPA ID# ALR000013490 with the applicable regulations.

8) **Facility Description**

Valmont Coatings Inc. dba Valmont Birmingham Galvanizing (Valmont Birmingham) in Steele, Alabama, is a hot dip galvanizer. Valmont Birmingham receives steel parts from clients, including Valmont products, to first be cleaned, then placed in a sodium hydroxide (caustic) bath and rinsed in the hydrochloric acid tanks. The cleaned steel is placed in pre-flux made of zinc chloride and ammonium chloride to keep the steel from rusting and as well as aiding the galvanizing process. Then the steel is dipped into the molten zinc bath and quenched in a weak sodium bichromate. Depending on customer requirements the steel parts may be painted with polyvinyl paint.

Valmont Birmingham is on 82 acres with 148,000 square feet of production area with three bays for outside clients, the galvanizing process and Valmont products. Valmont Birmingham employs approximately 70 employees with two employees that handle hazardous waste. The facility operates 5 days per week, 16 hours per day and two shifts.

Valmont Birmingham's most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated January 29, 2019, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently, Valmont Birmingham generates used oil, universal wastes, paint and solvent waste, and other wastes which include D002, D006, D007 and D008 hazardous wastes.

9) Previous Inspection History

This facility was last inspected on December 4, 2014, by ADEM. Three violations were found during the inspection and returned to compliance on January 30, 2015.

10) Findings

At approximately 11:30 a.m. CDT, the EPA and ADEM inspectors arrived at the Valmont Birmingham facility, presented their credentials to the front desk and signed in. Mr. Randle Cunningham, General Manager greeted the inspectors and showed them to the conference room. Mr. Cunningham, Mr. James McDonough, EHS Coordinator met with the inspectors for an opening conference. The inspectors presented their credentials to Mr. Cunningham during the opening conference.

At the opening conference, a brief explanation of the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Non-Valmont Products Bay

The left side of the production area is dedicated to non-Valmont products from outside clients. The inspectors observed in this area the loading dock for incoming materials, the equipment used to load the steel parts for the process, the less than 90-day central accumulation area (CAA) and the wheelabrator.

The CAA was located near the loading dock doors. The area was chained off and contained empty drums stacked on their sides and a white 5-gallon container of used oil sitting on a secondary containment pallet. The used oil container was observed not closed and not labeled. In addition, the secondary containment pallet contained oil and was not closed and not labeled. The inspectors advised Mr. Cunningham and Mr. McDonough to clean out the secondary containment pallet or label and close it per used oil regulations. No hazardous waste was observed in the area at the time.

Pursuant to ADEM Admin. Code r. 335-14-17-.03 (4)(c)1., [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Pursuant to ADEM Admin. Code r. 335-14-17-.03 (4)(a)1., a container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Beside the CAA were forty-four 55-gallon drums of burnt zinc from the Metaullics Zinc Recovery (MZR) System (Picture 5). The drums of burnt zinc are to be sold for reclamation of the zinc content.

The inspectors observed a black 55-gallon drum with a green hose in the bung (Pictures 6-7). Mr. Cunningham and Mr. McDonough explained that the diesel fuel tank was moved indoors because of the constant intake of rain into the tank. The water and diesel sludge were released into the sump, and then pumped into the drum. Mr. Cunningham said the contents of the drum would be analyzed.

The inspectors explained that the satellite accumulation area (SAA) drum must be labeled "hazardous waste" and "pending analysis" and dated until the results are received.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5]40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

10.2 Galvanizing Process

The galvanizing process is located between the two product areas. The inspectors observed thirteen 55-gallon drums of zinc dross (Picture 9) and one 55-gallon drum of burnt zinc (Picture 10) to be sold for reuse.

Mr. Cunningham escorted the inspectors along the galvanizing process and explained the two lines concurrently. The main line uses one tank of caustic acid, four tanks of hydrochloric acid, one rinse tank, a hot pre-flux tank, a zinc kettle and a chromate quench. The spin line uses a wheelabrator to shot blast the parts, three tanks of hydrochloric acid, one rinse tank, one hot pre-flux tank, a zinc kettle and the spin process to remove excess zinc. The main line is used for utility transmission towers and the spin line is used for small parts.

When the hydrochloric acid is no longer usable, the spent acid is pumped directly from the tank into a tanker and shipped off the same day. The facility usually sends off between 4,000-4,500 gallons per shipment.

The inspectors observed the spaces between the tanks contained overflowed liquids on the floor. Mr. Cunningham also explained that the secondary containment that the tanks sit on is acid resistant brick. Mr. Cunningham explained that the overflowed liquid is squeegeed together and pumped back into the tank.

The zinc skims are removed from the zinc kettle manually using a basket (Picture 11). The scooped-out skims are placed into a container for the MZR (Picture 13). The MZR system separates the zinc dross using high temperature and a rotating drum to separate out the impurities in the dross. Once the zinc is molten it is poured into a mold to solidify (Picture 12).

10.3 Valmont Products Bay

The Valmont products bay galvanizes transmission poles for the utility companies. The finished poles are inspected by a utility inspector and loaded on trucks for transport.

The inspectors observed a spent aerosol can puncture system on a 55-gallon drum. The drum was not labeled, and the puncture system attached to the bung hole was not closed (Pictures 14-16). Mr. Cunningham explained that the zinc paint residue collected is not disposed of but reused to touch up the poles and that the residue is not a waste.

Near to the spent aerosol can drum was a 55-gallon drum used to collect scrap cans that had been punctured (Pictures 17-18). A 55-gallon drum labeled "Spray Cans" contained punctured cans and trash instead of unpunctured spent aerosol cans (Pictures 19-20). The inspectors also observed a 55-gallon drum of one-gallon zinc paint cans with dried residue (Picture 21).

Depending on the customers, polyvinyl two-part epoxy paint is used. The inspectors observed in the Polyvinyl Area dried overspray residue on the floor, scraped up in a pile and then placed in a 55-gallon drum (Pictures 22-24). Also, four 55-gallons of reclaimed blast media shot was stored in this area (Picture 25). The shot will be put back into the process and reused.

10.4 Paint Room

The Paint Room is located next to the Polyvinyl Area. The Paint Room is used to mix the two-part epoxy paint used on the transmission poles. The polyvinyl paint hardens quickly so that paint is mixed right before it is applied.

The inspectors observed a 55-gallon drum of methyl ethyl ketone (MEK) with a faucet attached to the bung (Picture 26). The secondary containment under the drum was filled with MEK and a container filled with MEK and two brushes (Picture 27). The MEK is used to clean the paint brushes and the paint gun. Small containers of MEK used for cleaning was observed on the worktop (Picture 28).

The inspectors also observed a 55-gallon SAA drum of waste MEK and paint with a red funnel that was not closed, a red SAA step can of waste MEK contaminated rags and personal protective equipment and a half gallon container of waste MEK and paint that was not closed or labeled (Pictures 29-32).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5 [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Records Review

The inspectors requested the training records, the contingency plan, the weekly inspection records, the waste profiles, the waste minimization plan, weekly inspection logs, the 2016-2019 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated January 29, 2019.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Stephen Skinner and Brandi Randolph were provided. Mr. Skinner and Ms. Randolph were provided General Awareness, Safety and Security and DOT: Hazardous Shipper online training by Valmont University on July 3, 2018 and June 29, 2018, respectively. The job titles and descriptions were in their training records.

The inspectors requested the Emergency Response Plan, Revision 4 revised on November 15, 2017, and reviewed by the facility on January 30, 2019, for review. The plan included an emergency

contact list, a current evacuation map, a fire extinguisher inspection list, and documentation (i.e., green return receipt cards, emails) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital). However, a list of emergency response equipment was not available.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(9]40 C.F.R. § 262.261(e)], and is a condition of the LQG Permit Exemption, the contingency plan must include a list of all emergency equipment at the facility where this equipment is required, and this list must be kept up to date.

In addition, the updated regulation under the Generator Improvement Rule, requires that the generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders to have the following information:

(1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
(2) The estimated maximum amount of each hazardous waste that may be present at any one time;
(3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;
(4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
(5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
(6) The locations of water supply (e.g., fire hydrant and its flow rate);
(7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
(8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

At the time, of the inspection, the current contingency plan had been updated after May 2017, and the Quick Reference Guide was not available at this time.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(10) [40 C.F.R. § 262.262(b)(1-8)[, and is a condition of the LQG Permit Exemption, a generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders.

The inspectors reviewed the weekly inspection records for 2016-2019 for the facility. The inspectors observed that inspections between December 21, 2018, and January 29, 2019, were not conducted.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(v) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

The waste minimization plan was requested. The plan provided and reviewed was updated July 8, 2016.

Hazardous and non-hazardous manifests were reviewed for 2017-2019. Safeway Industrial Services (EPA ID ALR000053272) in Glencoe, AL and Homeland Environmental Solutions (EPA ID ALR000046870) transported the hazardous wastes and used oil to the following facilities: Clean Earth of Alabama, LLC (EPA ID ALD981020894) in Glencoe, AL; Vickery Environmental Inc. (EPA ID OHD020273819) in Vickery, OH; and Giant Resources Recovery Attalla, Inc. (EPA ID ALD070513767) in Attalla, AL. The land disposal restriction forms were reviewed.

Three boxes of universal waste lamps (30 spent lamps) were boxed and taken to Lowe's Home Improvement of Gadsden, AL – Store #1640 by Mr. McDonough on March 27, 2019.

The inspectors requested and reviewed waste profiles for CorroCote II Parts A and B, Waste Flammable Liquid MEK and Filter Press Sludge. The CorroCote polyvinyl paint waste profile was non-hazardous based on generator knowledge. The Waste Flammable Liquid MEK and the Filter Press Sludge are sampled and analyzed annually. The Waste MEK was hazardous, and the Filter Press Sludge was non-hazardous per the analysis results.

11) Summary

The inspectors conducted the exit meeting with Mr. Cunningham and Mr. McDonough in person, and Mrs. Sally Buck, Corporate Environmental, via conference call. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Valmont Coatings Inc. dba Valmont Birmingham Galvanizing was inspected as a large quantity generator of hazardous waste, the facility appeared to be deficient with some requirements of RCRA.

On July 18, 2019, Mr. Cunningham provided the following updates via email:

1. *Used oil not labeled*
2. *Same used oil not closed*
    a. *1. and 2. Bucket was emptied into 55-gallon drum of waste diesel fuel and water*
3. *Spill control pallet has oil in the bottom of it*
    a. *Oil was poured into 55-gallon drum and labeled. Spill pallet was cleaned*
4. *Satellite accumulation container (55-gallon drum) and plastic container of MEK not closed*
    a. *Latch repaired and locked*
5. *One satellite container (55-gallon drum) and plastic container not labeled properly*
    a. *Accumulation drums closed and labeled. Plastic container with MEK was put in the accumulation drum. Container was labeled.*
6. *Hazard waste weekly inspections not continued since January 2019 when there was no Hazard waste (still has to be done)*
    a. *Hazard waste inspection log updated*
7. *Contingency plan did not contain a list of emergency response equipment*
    a. *Emergency response equipment check list added*
8. *Contingency plan did not have a quick reference guide*
    a. *Contingency plan quick reference guide added*

12) Signed

Paula A. Whiting
Environmental Engineer

7/24/19
Date

Concurrence

Alan A. Annicella
Chief
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

07/24/2019
Date

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ATTACHMENT A

VALMONT COATINGS INC. DBA VALMONT BIRMINGHAM GALVANIZING

STEELE, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

June 24, 2019

Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374

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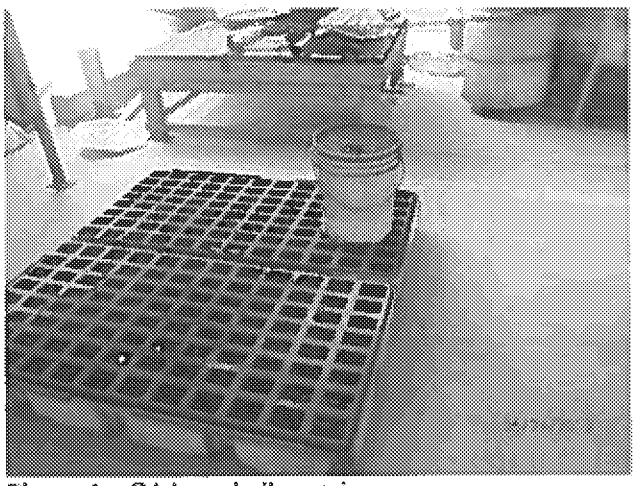
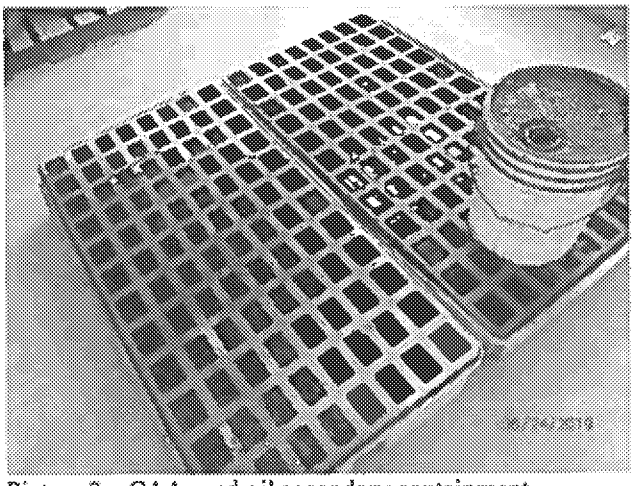
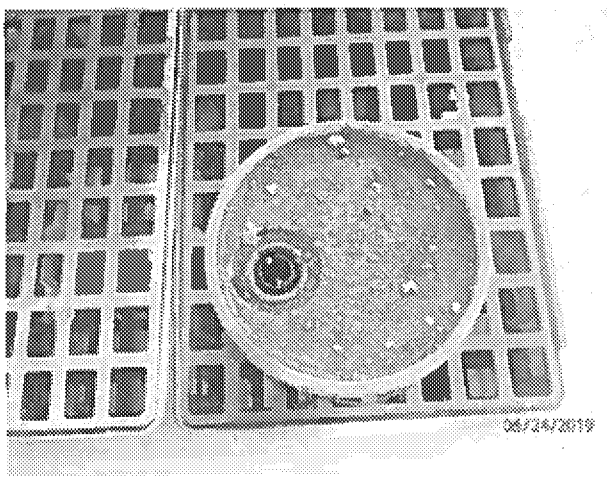


Picture 1 – CAA used oil container

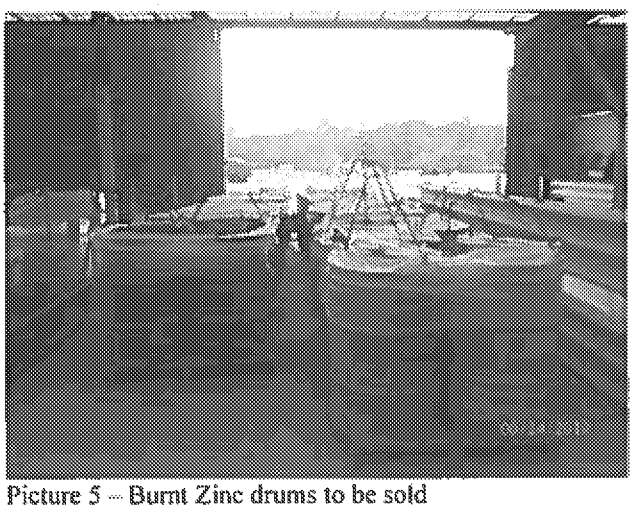


Picture 2 – CAA used oil secondary containment

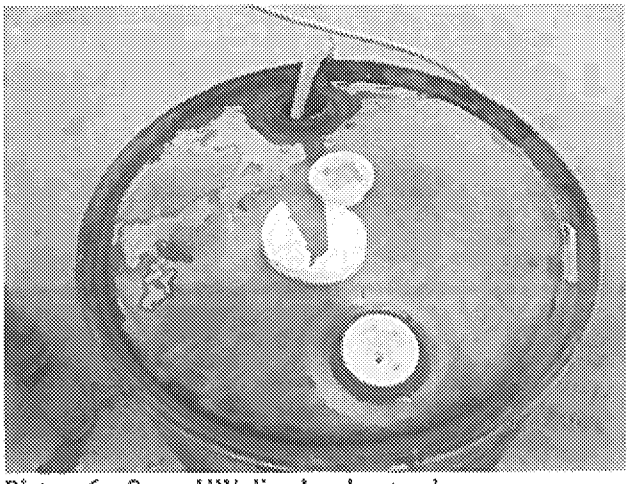


Picture 3 – CAA used oil container open

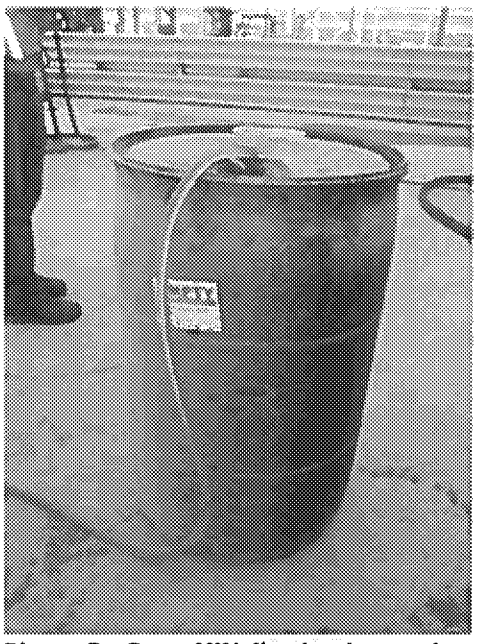
Picture 4 – CAA used oil container



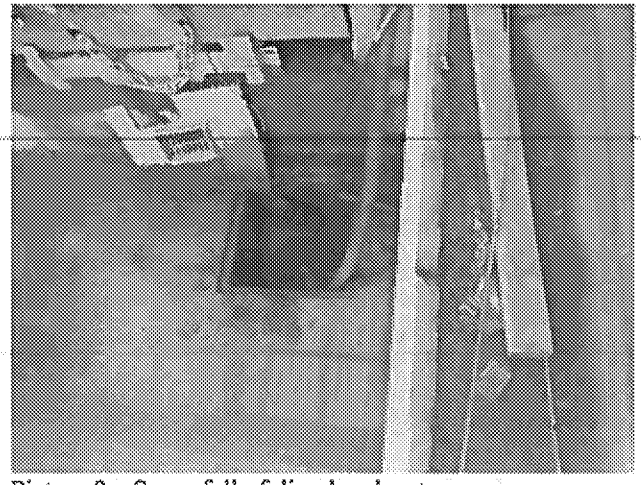
Picture 5 – Burnt Zinc drums to be sold



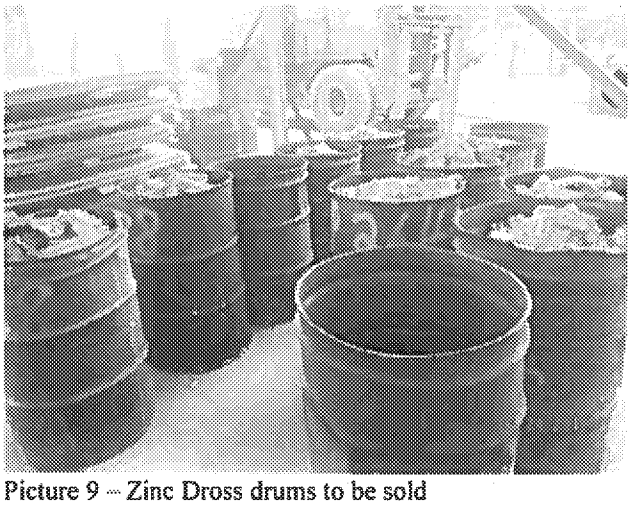
Picture 6 – Sump HW diesel and water drum



Picture 7 – Sump HW diesel and water drum

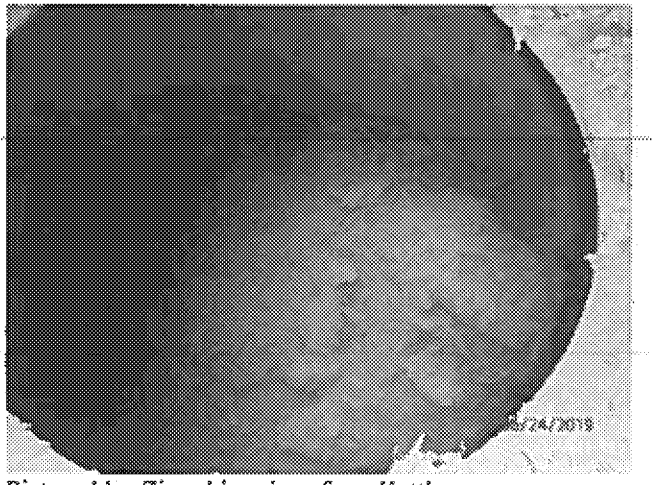


Picture 8 – Sump full of diesel and water

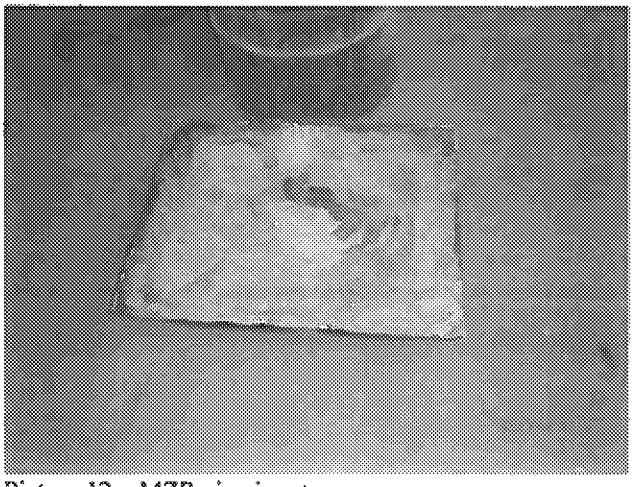


Picture 9 – Zinc Dross drums to be sold

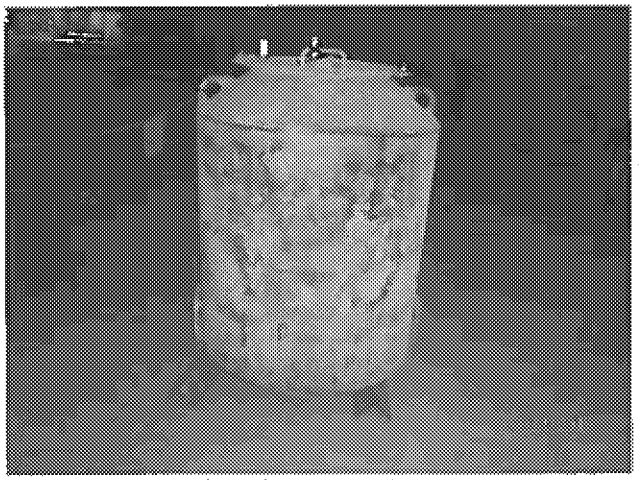
Picture 10 – Burnt Zinc drum to be sold



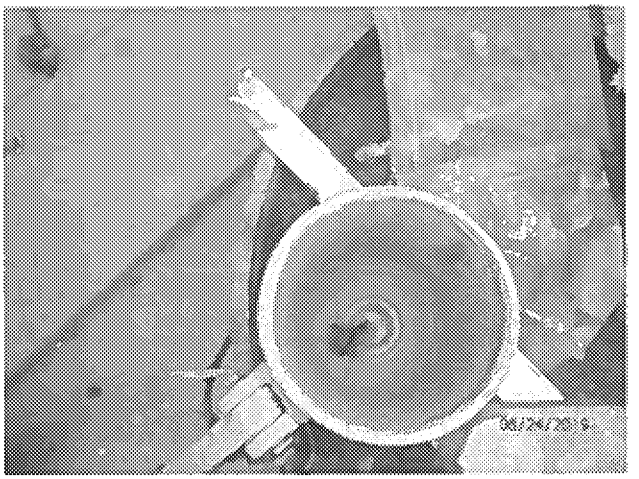
Picture 11 – Zinc skimmings from Kettle



Picture 12 – MZR zinc ingot

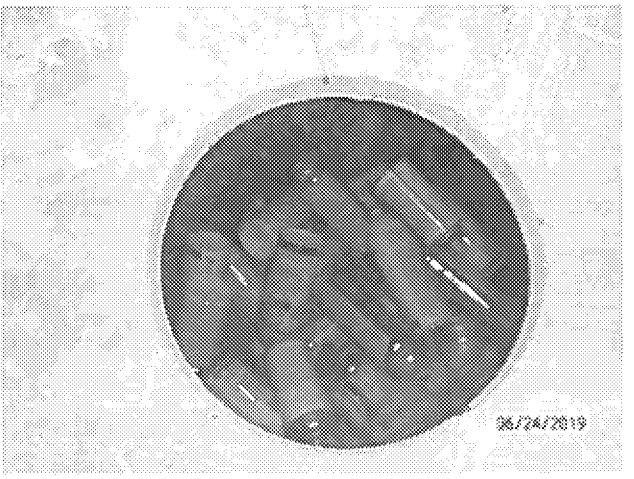


Picture 13 – MZR barrel



Picture 16 – Puncture can system open

Picture 14 – Puncture can station



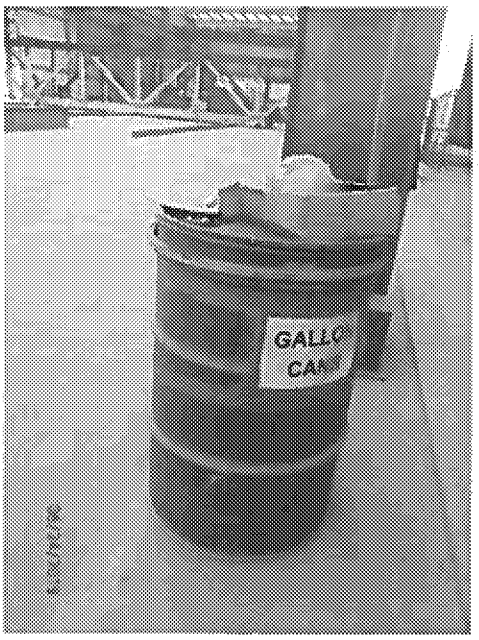
Picture 17 – Punctured cans drum

Picture 15 – Puncture can system and residue drum

Picture 18 – Punctured cans drum

Picture 19 – Spray Cans drum for unpunctured cans

Picture 20 – Spray Cans drum for unpunctured cans

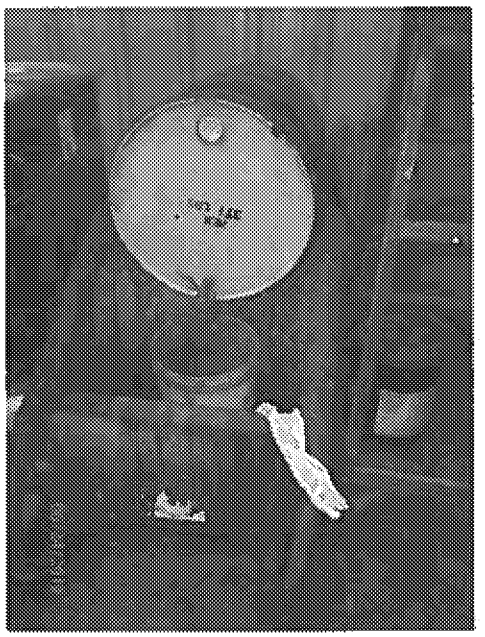


Picture 21 – Gallon paint cans drum

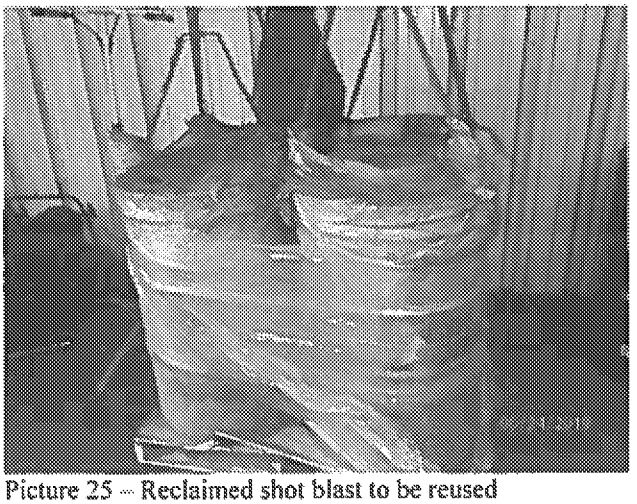
Picture 22 – Polyvinyl overspray to be discarded

Picture 23 – Polyvinyl overspray to be discarded

Picture 24 – Polyvinyl overspray discarded



Picture 26 – Paint Room MEK drum



Picture 25 – Reclaimed shot blast to be reused

Picture 27 – Paint Room MEK brush cleaner

Picture 28 – Paint Room MEK brush cleaner

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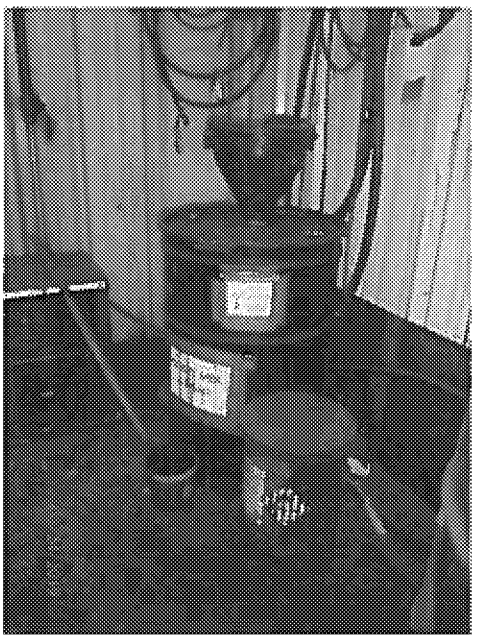
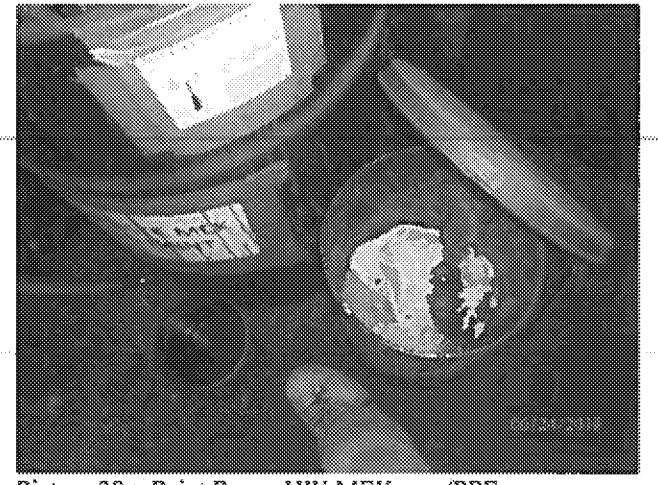
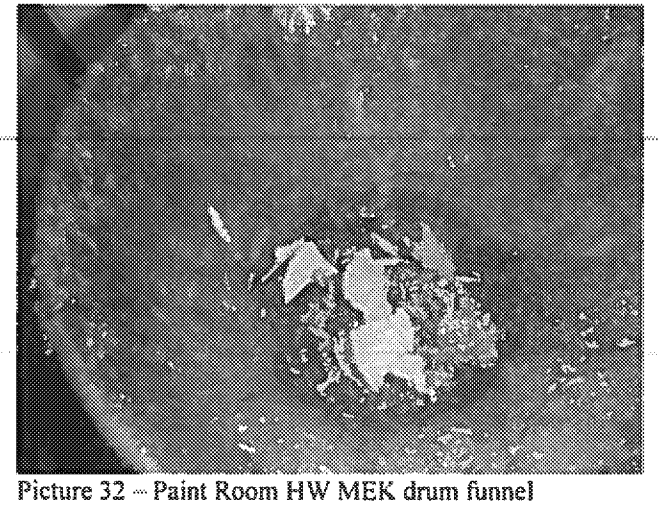


Picture 29 – Paint Room HW MEK containers

Picture 31 – Paint Room HW MEK drum



Picture 30 – Paint Room HW MEK rags/PPE



Picture 32 – Paint Room HW MEK drum funnel