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## Hazardous Waste Enforcement: Alabama Department of Environmental Management and Birmingham, Alabama Outdoor Sign/Component Manufacturing Facility Enter into Consent Order

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The Alabama Department of Environmental Management (“ADEM”) and Sign Builders, Inc. (“SBI”) entered into a September 19th Consent Order (“CO”) addressing alleged violations of certain hazardous waste regulations. See Consent Order No. 19-XXX-CHW.

The CO provides that SBI operates a commercial outdoor sign and sign component manufacturing facility (“Facility”) in Birmingham, Alabama.

The Facility is stated to utilize an EPA Identification Number and is a small quantity generator as that term is defined in ADEM Admin. Code Div. 14.

Representatives of ADEM’s Industrial Hazardous Waste Branch conducted a compliance evaluation inspection (“CEI”) on April 9th of the Facility. The CEI allegedly identified the following potential violations:

- Failure to make an accurate waste determination on still bottoms generated during reclamation of F003 and F005 listed hazardous wastes
- Failure to prepare a uniform hazardous waste manifest for each shipment of hazardous waste (i.e., still bottoms waste) sent for disposal
- Offered its hazardous waste (i.e., still bottoms waste) to a transporter that had not received an EPA identification number and an Alabama Hazardous Waste Facility

Permit or interim status

- Failure to keep two closed satellite accumulation containers of hazardous waste.
- Failure to mark or label twenty-nine satellite accumulation containers of hazardous waste with the words “Hazardous Waste” and an indication of the hazards of their contents
- Failure to provide hazardous waste management training to its employees

SBI neither admits nor denies ADEM’s contentions.

A civil penalty of \$25,300 is assessed.

A copy of the CO can be downloaded [here](#).