

LASERFICHE FILE TRANSMITTAL FORM
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

Your Name: Bobby Nelms

Document Category: Facility

Document Group: General (G)

Document Type: Correspondence (C)

EPA ID: NCD091572073

Facility Name/Subject: Glycotech, Inc.

Document Date: 11/18/2008
(or Inspection Date)

Description:

2001 - 2008

Author: Bobby Nelms

Branch/Unit:

Facility/Site Address:

Facility/Site City:

Facility/Site State: North Carolina

Facility/Site Zipcode:

Facility/Site County:

File Room Use Only

	Month	Day	Year
Date Received by File Room			
Date Scanned			



Hazardous Waste Section
File Room Document Transmittal Sheet

17

Your Name: Bobby Nelms
EPA ID: N C D 0 9 1 5 7 2 0 7 3
Facility Name: GLYCOTECH INC/Formerly National Starch/CT Specialties
Document Group: General (G)
Document Type: Correspondence (C)
Description: File to be scanned.
Date of Doc: 5/15/2014
Author of Doc: Bobby Nelms

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Date Recieved by File Room:
Date Scanned:

Month	Day	Year

NCD091572073
Scanner's Initials:

Hazardous Waste Compliance Data Entry Form

f. 12

EPA ID Number: NCD 091 572 073

Facility Name: C.T. Specialties, LLC

Street: 2271 Andrew Jackson Hwy.

City: Leland ZIP: 28470 County: Brunswick

Contact Name: Gary Wooten Phone#: (910) 371-2234

EVALUATION DATA New: Change: Delete:

Date: 11/18/2008 Evaluation Type: CEI

Date: ___/___/___ Evaluation Type: _____

Inspector ID #: 036

Evaluation Comments:

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (check one):

_____ a SNC (SNY evaluation) Docket # _____
or
_____ no longer a SNC (SNN evaluation)

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

Date Determined: ___/___/___

Branch: _____ Person: _____

Return to Compliance: _____ / _____ / _____
Scheduled Actual

Regulation Description: _____

Comment: _____















Lot No: _____ Date: _____
Prod. Desc: _____
MFRS: _____



**HAZARDOUS
WASTE**
HANDLE WITH CARE



159

159

3

9

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HAZARDOUS WASTE
MANAGEMENT
INFORMATION SYSTEM
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MICHIGAN
ANN ARBOR, MI 48106-1500
www.umich.edu

**HAZARDOUS
WASTE**





CAUTION

DO NOT OPERATE
WITHOUT EYE
PROTECTION

CAUTION

DO NOT OPERATE UNLESS
SAFETY GUARDS OR DEVICES
ARE IN PLACE AND
PROPERLY ADJUSTED

DIAMOND GRIP
POWER TOOL GLOVES
MICROFLEX

Proctor
Rubber Centre
HMS



**NC DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
ACTIVITY REPORT**

Date: 18 November 2008 **Report By:** Bobby Nelms **No:** 036

Subject: C.T. Specialties, LLC

Location: 2271 Andrew Jackson Hwy.

City: Leland, NC **Zip:** 28470 **County:** Brunswick

Contact Person: Gary Wooten **Tel#:** (910) 371-2234

Reason for visit: CEI (Generator Closure)

REPORT:

On the above date, I visited the referenced site at the facility's request to perform a closure inspection. C.T. Specialties, LLC has been bought and sold a few times in past years and is now about to undergo another change on 5 December 2008.

The facility had been operating as a SQG by running an operation to attempt to extract precious metals from ore which originated from Arizona. The operation never succeeded as planned and the operation ceased in October 2006. Since that time the facility has been in limbo and a small number of employees have been left on site to maintain the equipment.

I met with Mr.'s Gary Wooten and Jimmy McLawhorn to walk through the facility and discuss the closure. All lines, pumps and vessels have been flushed and pressure washed and the facility is essentially clean. No hazardous waste was observed on site and all maintenance related chemicals (i.e. boiler additives, lubricants and paints) will be left on site for the new owners.

The new owners, Salisbury Partners, will close on the property on 5 December and begin tooling up for the new process (unknown at this time) the next Monday so there will be no down time that the facility will be sitting idle.

I recommended that a form 8700-12 be submitted by the new owners if hazardous waste will be generated.

Activity type: CEI

EPA ID NUMBER: NC D 091572073

Facility Name: CT Specialties Properties LLC City: Leland

EVALUATION DATA New: Change: Delete:

Date: 8/31/05 Type: CAU
Date: / / Type:

Inspector ID #: 036 Reason:

Evaluation Comments:

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)
- a SNC (SNY evaluation) _____ Docket # _____
or
- no longer a SNC (SNN eval.) _____

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a. gw. sw. s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

_____ Type: _____ Date Determined _____ / _____ / _____ Class: _____

Priority: _____ Branch: _____ Person: _____

Return to Compliance _____ / _____ / _____
Scheduled *Actual*

Reg. Type: _____ Reg. Description: _____

Comment: _____

_____ Type: _____ Date Determined: _____ / _____ / _____ Class: _____

Priority: _____ Branch: _____ Person: _____

Return to Compliance: _____ / _____ / _____
Scheduled *Actual*

Reg. Type: _____ Reg. Description: _____

Comment: _____

State of North Carolina
Department of Environment & Natural Resources
Division of Waste Management
Hazardous Waste Section

~~Comprehensive Evaluation Inspection (CEI) Report~~
Compliance Assistance Visit (CAV)

1. FACILITY INFORMATION

Name: ~~CT Property~~ CT Specialty Properties LLC

EPA ID Number NCD 091 572 073

Type of Facility LQG

Facility Location 2271 Andrew Jackson Hwy
Leland, NC 28451

Telephone Number: 910-371-2234

OWNERSHIP: Neke Kim Corp.

2. FACILITY CONTACT: Gary Wooten

3. SURVEY PARTICIPANTS: Gary Wooten

Robert K. Nelms NCDENR

4. DATE OF INSPECTION: 31 August 2005

5. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261,262,265,268 and 279.

6. FACILITY DESCRIPTION: CT specialties is a silk clinical manufacturer. The facility is presently changing its operation from the former operation of specialty clinical manufacturing. Presently only R&D is being done in an attempt to develop a working line for the final process. This visit was at the request of Gary Wooten.

7. HAZARDOUS WASTE STREAMS INCLUDE :

Waste Vacuum Pump Oil - D001

8. AREAS OF REVIEW AND INSPECTION:

- Emergency Preparedness Contingency Plan
- Inspection Records (storage) Manifests / LDR
- Training Records Biennial Report

• Transporters:
*No manifest No waste has been shipped under
 - new name. Old manifests were present.*

• TSD's:

• Accumulation Areas:
*Three 55 gallon drums in the blind room. All drums
 were separated and labeled, dated and closed*

• Storage Areas:
No waste in storage -

• External Condition of Facility: *No adverse conditions*

9. WASTE MINIMIZATION: *Need to develop plan*

10. SITE DEFICIENCIES:
CAV - No Violations

11. RECOMMENDATIONS:
*Containerize and date universal waste bulbs.
 Update contingency plan issues which were discussed*

[Signature] DATE: *8/31/05* *[Signature]* DATE: *8/31/05*
 Robert K. Nelms Facility Representative
 Waste Management Specialist, NCDENR

**NC DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
ACTIVITY REPORT**

Date: 16 June 2005 **Report By:** Bobby Nelms **No:** 036

Subject: C. T. Specialties

Location: Highway 74/76

City: Leland, NC **Zip:** 28470 **County:** Brunswick

Contact Person: Alan Stout (consultant) **Tel#:** (910)

Reason for visit: Compliance Assistance

REPORT:

C.T. Specialties is the former Pressure Chemical site. The facility contacted me a few months ago about changing the site's EPA ID number. I had not heard anything from them in a good while so I stopped by to check their present operational status. Presently, the facility is adjusting its process and units to run the product which they intend to manufacture. Being as they are not operational at this time I did not walk through the facility. I informed Mr. Stout that I would be back for an inspection in a few months.

The facility will be a SQG due to the vast reduction in waste which will be generated once they begin operation. Facility personnel attended the LQG workshops put on by the HWS this past May.

Activity type: Compliance Assistance Visit (CAV)

From: Gary Wooten [gwooten@PressChem.com]
Date: Nov 4, 2005 16:06
To: <Robert.Nelms@ncmail.net>
Cc: "Jimmy McLawhorn" <jmclawhorn@PressChem.com>
Subject: Facility Update
Attachments:  MEMO.doc (28 KB)

Bobby,

I have attached an update explaining the current status of our facility, CT Specialty Properties.

We are most appreciative of your input and advice on Hazardous Waste compliance issues identified in your August visit to our plant site. Hopefully our chemical processes will up and running again very soon.

Best Regards

Gary Wooten
CT Specialty Properties, LLC

(910-371-2234 ext. 12)
<<MEMO.doc>>

[Close Window](#)

MEMO

Date: November 4, 2005

To: Robert Nelms
NCDENR

From: Gary Wooten
CT Specialty Properties, LLC
Leland, NC

Mr. Nelms,

I just wanted to take the opportunity to give you an update on the status of our Research and Development work at CT Specialty Properties. Since you last visited our facility on August 31, 2005 we continued to run trial batches thru September 16, 2005. By September 23, 2005 all filtrations and solvent recovery were completed, and the entire hourly work force was put on temporary lay-off. That lay-off remains in effect and the date we will resume R&D operations is yet to be determined. Currently there are three salaried employees working at our site planning equipment modifications and assisting to help technical personnel (currently working offsite) to resolve critical process issues. These three salaried employees are conducting required audits and inspections to assure compliance with regulatory requirements.

Due to the nature of the R&D processing, there has been no product sold or shipped, and no waste of any kind shipped off site. We have not yet placed any hazardous waste in the Hazardous Waste Storage Area, with the same Satellite Accumulation Drums you saw during your visit not yet filled.

Today, important contacts were made with equipment suppliers to obtain quotes on equipment modifications required for the next round of R&D processing. Once this equipment is purchased, we plan to call hourly employees back to work (some possibly to assist in the installation) as soon as we have meaningful work to perform. Our facility will resume R&D processing at the earliest possible date, which is yet to be determined.

We wanted to update you since we are not in a "manufacturing mode". We have followed thru with implementing the recommendations you made during your August visit, and wish to thank you for your input and suggestions. If you have any questions please feel free to contact me at 910-371-2234 ext. 12 or by e-mail at "gwooten@PressChem.com."

Best Regards,

Gary Wooten

EPA ID Number: NCD091572073

Facility Name: CT Specialties City: Leland

EVALUATION DATA New: Change: Delete:

Mo. Day Yr. Type:
Date: 6 / 16 / 05 CAV
Date: / /

Inspector ID #: 036 Reason:

Evaluation Comments:

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)
- a SNC (SNY evaluation) _____ Docket # _____
or
- no longer a SNC (SNN eval.) _____

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a. gw. sw. s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

_____ Type: _____ Date Determined _____ / _____ / _____ Class: _____

Priority: _____ Branch: _____ Person: _____

Return to Compliance _____ / _____ / _____
Scheduled *Actual*

Reg. Type: _____ Reg. Description: _____

Comment: _____

_____ Type: _____ Date Determined: _____ / _____ / _____ Class: _____

Priority: _____ Branch: _____ Person: _____

Return to Compliance: _____ / _____ / _____
Scheduled *Actual*

Reg. Type: _____ Reg. Description: _____

Comment: _____

**NC DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
ACTIVITY REPORT**

Date: 16 June 2005 **Report By:** Bobby Nelms **No:** 036

Subject: C. T. Specialties

Location: Highway 74/76

City: Leland, NC **Zip:** 28470 **County:** Brunswick

Contact Person: Alan Stout (consultant) **Tel#:** (910)

Reason for visit: Compliance Assistance

REPORT:

C.T. Specialties is the former Pressure Chemical site. The facility contacted me a few months ago about changing the site's EPA ID number. I had not heard anything from them in a good while so I stopped by to check their present operational status. Presently, the facility is adjusting its process and units to run the product which they intend to manufacture. Being as they are not operational at this time I did not walk through the facility. I informed Mr. Stout that I would be back for an inspection in a few months.

The facility will be a SQG due to the vast reduction in waste which will be generated once they begin operation. Facility personnel attended the LQG workshops put on by the HWS this past May.

Activity type: Compliance Assistance Visit (CAV)

24 copies
 charge @ .10 per copy over 25
 paid

STATE OF NORTH CAROLINA
 Department of Environment and Natural Resources
 127 Cardinal Drive Extension
 Wilmington, North Carolina 28405
 (910) 395-3900

File Access Record

SECTION Solid Waste
 TIME/DATE 6/28/04
 NAME Carolyn Goodridge
 REPRESENTING: _____

Guidelines for Access: The staff of the Wilmington Regional Office is dedicated to making public records in our custody readily available to the public for review and copying. We also have the responsibility to the public to safeguard these records and to carry out our day-to-day program obligations. Please read carefully the following guidelines before signing the form:

- Please call at least a day in advance to schedule an appointment to review the files. **Appointments will be scheduled between 9:00 a.m. and 3:00 p.m.** Viewing time ends at 5:00 p.m. **Anyone arriving without an appointment may view the files to the extent that time and staff supervision is available.**



Carolyn Goodridge
 Staff Geologist

ENSR International
 7041 Old Wake Forest Road
 Suite 103
 Raleigh, NC
 27616-3013

(919) 872-6600
 FAX (919) 872-7996
 e-mail: cgoodridge@ensr.com
 www.ensr.com

nt to review by facility name. The number of files that will be limited to five.

when the copier is not in use by the staff and if time **is free, 26 or more require payment in full for all copy; payment may be made by check, money order, or Copies can also be invoiced for your convenience.**

IN THE ORDER YOU FOUND THEM. Files may not be taken, altered, deface, mutilate, or destroy material in one of these files is a misdemeanor for which you can be fined up to \$500.00.

- In accordance with General Statute 25-3-512, a \$25.00 processing fee will be charged and collected for checks on which payment has been refused.

	FACILITY NAME	COUNTY
1.	<u>Pressure Chemical Company</u>	<u>Brunswick</u>
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

x Carolyn Goodridge ENSR 1 x 6/29/04 x 1000 x 1230
 Signature and Name of Firm/Business Date Time In Time Out
 Please attach a business card to this form

EPA ID Number: NCD 091572073

Facility Name: Pressure Chemical Co. City: Leland

EVALUATION DATA New: Change: Delete:

Mo. Day Yr. Type:
Date: 11 10 03 C E I
Date: 11 10 03 C S E

Inspector ID #: 036 Reason: 01

Evaluation Comments: Violation Corrected

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)
- a SNC (SNY evaluation) _____ Docket # 2004-028
or
- no longer a SNC (SNN eval.) _____

YES/NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

1 Type: G R R Date Determined 11/10/03 Class: A

Priority: _____ Branch: 07 Person: 36

Return to Compliance 11/10/03 11/10/03

Reg. Type: S R Reg. Description: 262.34(a)(4) - 265.14(c)
Scheduled *Actual*

Comment: Failure to provide annual training to two employees within 365 days.

_____ Type: _____ Date Determined: _____/_____/_____ Class: _____

Priority: _____ Branch: _____ Person: _____

Return to Compliance: _____/_____/_____ *Scheduled* *Actual*

Reg. Type: _____ Reg. Description: _____

Comment: _____

State of North Carolina
Department of Environment & Natural Resources
Division of Waste Management
Hazardous Waste Section
Comprehensive Evaluation Inspection (CEI) Report

1. FACILITY INFORMATION

Name: Pressure Chemical Co.
EPA ID Number NCD 091 572 073
Type of Facility LDC
Facility Location 2271 Andrew Jackson Highway
Leland, NC 28451
Telephone Number: (910) 371-2234
OWNERSHIP: Pressure Chemical Co.

2. FACILITY CONTACT: Jo Ellen Elison

3. SURVEY PARTICIPANTS: Jo Ellen Elison

Robert K. Nelms NCDENR

4. DATE OF INSPECTION: 10 November 2002

5. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261,262,265,268 and 279.

6. FACILITY DESCRIPTION:

Pressure Chemical Company, located on Hwy 74 West of
Wilmington, NC manufactures specialty chemicals and
provides custom manufacturing of chemicals for others.
The company has POTW pretreatment and stormwater
permits. An active groundwater remediation system is on
the site however it is maintained by National Steel & Chemical Corp.

7. HAZARDOUS WASTE STREAMS INCLUDE:

Dichlorobenzene F002
Sput Solvents D001, F005
Mixed Organic Liquids F005, D038

8. AREAS OF REVIEW AND INSPECTION:

- ▶ Emergency Preparedness Contingency Plan
- ▶ Inspection Records (storage) Manifests / LDR
- ▶ Training Records Biennial Report

▶ Transporters:

Freehold Cartage NJD054126164

Triad Transport Inc. OKD 981 588 791

▶ TSD's:

Pollution Control Industries IND 000 646 943

E. I. DuPont De Nemours & Co. NJD 002 385 730

▶ Accumulation Areas:

Enasco ARD 069 748 192

One drum of HR vacuum pump #2

▶ Storage Areas:

One storage area containing approximately 60 totes and 80 drums of Haz. waste. No violations.

▶ External Condition of Facility:

No adverse conditions noted

9. WASTE MINIMIZATION:

Source Reduction

10. SITE DEFICIENCIES:

262.34(c)(4) - 265.16(c) Failure to train two employees within one year of previous training.

Alan Stort 5/14/02 - 6/2/03

Brian Stevens 10/3/02 - 10/7/03

11. RECOMMENDATIONS:

Vast improvement in the Haz. Waste storage area.

Robert K. Nelms

DATE: 11/10/03

Robert K. Nelms
Waste Management Specialist, NCDENR

J. Ellen Eixson

DATE: 11-10-03

Facility Representative

Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

To: Pressure Chemical Corp. ^{RKN}
2271 Andrew Jackson Hwy.
Leland, NC 28451

Docket #: 2004-028
Inspection Date: 10 Nov. 2003
Facility Type: LDG.

EPA ID#: NC0091572073

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 10 November, 2003, Robert K. Nelms, representing the North Carolina Hazardous Waste inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Citation

Specifics

40 CFR 262.34(a)(4) - 265.14(c) Failure to provide annual (365 days)
training to two employees.
Alan Stout 5/14/02 - 6/2/03
Brian Stevens 10/3/02 - 10/7/03

(Violation Corrected)

You are hereby required to comply with the noted violation by 10 November, 2003, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13A .0701-.0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

Robert K. Nelms
Robert K. Nelms
Waste Management Specialist
NCDENR

10 November 2003
Date

I, Robert K. Nelms, hereby certify that I have personally served a copy of this notice on: Johanna Elixson at Pressure Chemical Co.

Johanna Elixson
Recipient Signature

11-10-03
Date

Hazardous Waste Compliance Data Entry Form - Side A

EPA ID Number: NC D09 1572073

Facility Name: Pressure Chemical Co. City: Leland

EVALUATION DATA New: Change: Delete:

Mo. Day Yr. Type:
 Date: 10/30/02 C E I
 Date: / / / /

Inspector ID #: 036 Reason:

Evaluation Comments:

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)

- a SNC (SNY evaluation) _____ Docket # _____
- or
- no longer a SNC (SNN eval.) _____

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

1 Type: G P T Date Determined 10130102 Class: II

Priority: Branch: 07 Person: 36

Return to Compliance

Reg. Type: SR Reg. Description: 262.34(a)(1)(i) - 265.173(a)

Comment: Failure to close containers

2 Type: G R R Date Determined: 10130102 Class: II

Priority: Branch: 07 Person: 36

Return to Compliance:

Reg. Type: SR Reg. Description: 262.34(a)(1)(i) 15A NCAC 13A rule.0110(i)

Comment: Failure to document weekly inspections

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

COMPREHENSIVE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Name: Pressure Chemical Co.
EPA ID Number: NCD 091 572 073
Type of Facility: Large Quantity Generator
Facility Location: 2271 Andrew Jackson Hwy NE
Leland, NC 28451
Telephone Number: (910) 371-2234

OWNERSHIP: Pressure Chemical Corporation

2. FACILITY CONTACT: Tim Williams, Project Coordinator

3. SURVEY PARTICIPANTS: Tim Williams, Jenny Rankin
Robert K. Nelms - NCDENR

4. DATE OF INSPECTION: 30 October 2002

5. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268 and 279.

6. FACILITY DESCRIPTION:

Pressure Chemical Company, located on Hwy 74 West of
Wilmington, NC, manufactures specialty chemicals and provides
custom manufacturing of chemicals for others.
The company has POTW pretreatment and stormwater permits.
An active groundwater remediation system is on the site, however,
it is maintained by National Starch and Chemical Corp.

7. HAZARDOUS WASTE STREAMS INCLUDE:

Spent solvents and byproducts of distillation.
D001, D002, D007, D038, F002, F003, F005, U041
* See annual report *

8. AREAS OF REVIEW AND INSPECTION :

- ▶ Emergency Preparedness Contingency Plan
- ▶ Inspection Records (storage) Manifests / LDR
- ▶ Training Records Biennial Report

▶ Transporters:

Freehold Cartage NJD 054 126 164

Tri-State Motor Transit MOD 095 038 998

▶ TSD's:

<u>Giant Cement Co.</u>	<u>DuPont</u>	<u>Enscow</u>	<u>Michigan Disposal WWT#</u>
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<u>SCD 003 351 699</u>	<u>NJD 054 126 164</u>	<u>ARD 069 748 192</u>	<u>MID 000 724 831</u>
------------------------	------------------------	------------------------	------------------------

▶ Accumulation Areas:

Lab - Closed + labeled container, Blender Room - Open 55 gal Drum, HR-28 Vacuum Pump - Open 55 gal. Drum, Across from Vacuum Pump #2 - Open 55 gal. Drum, Vacuum Pump #2 - Open 55 gal Drum

▶ Storage Areas:

Left of Blender Room - 18/55 gal drums - 20 totes, 8 unlabeled, 3 open

Right of Blender Room - 13 totes unlabeled, inadequate aisle space, no inspections

Near HR-28 Pump - 15 totes unlabeled, inadequate aisle space, no inspections

▶ External Condition of Facility: Flammable Storage Bldg. - Two 55 gal. drums no insp.

9. WASTE MINIMIZATION:

Recycling + minimization of products

10. SITE DEFICIENCIES:

262.34(a)(1)(i) - 265.173(a)

262.34(a)(1)(i) 15A NCAC 13A rule .0110(i)

262.34(a)(1)(i) - 265.174

262.34(a)(3)

262.34(a)(4) - 265.31

262.34(a)(4) - 265.34(a)

11. RECOMMENDATIONS:

262.34(a)(4) - 265.35

262.34(a)(4) - 265.52(c)

262.34(a)(4) - 265.16(c)

262.34(c)(1) - 265.173(a)

Robert K. Nelms

DATE: _____

DATE: _____

Robert K. Nelms
Waste Management Specialist, NCDENR

Facility Representative

Pressure Chemical

40 CFR 262.34 (a)(1)(i) – 265.173 (a) Failure to close two totes containing hazardous waste (DCH [Diaminocyclohexane] Scrubber Cleanout Solution, D002) located in the hazardous waste storage area.

40 CFR 262.34 (a)(1)(i) 15A NCAC 13A rule .0110(i) Failure to document weekly inspections for three of the hazardous waste storage areas.

40 CFR 262.34 (a)(1)(i) – 265.174 Failure to inspect areas where containers are stored at least weekly (every 7 days).

40 CFR 262.34 (a)(3) Failure to label or mark 27 totes with the words “Hazardous Waste.” These containers were located on both sides of the blender room door (DCH [Diaminocyclohexane] Scrubber Cleanout Solution, D002) and near the HR-28 vacuum pump (ODCB [Orthodichlorbenzene] F002).

40 CFR 262.34 (a)(4) – 265.16 (c) Failure to provide annual (365 days) review of the initial training required in 265.16 (a).

40 CFR 262.34 (a)(4) – 265.31 Failure to maintain the facility in a manner to minimize the possibility of a fire, explosion, or any unplanned sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment. Hazardous waste was observed leaking from two of the opened tote containers which contained DCH Scrubber Cleanout Solution, D002. These containers were located in the hazardous waste storage area to the left of the blender room.

40 CFR 262.34 (a)(4) – 265.34 (a) Failure to provide personnel with immediate access to an internal alarm or emergency communication device whenever hazardous waste is being handled.

40 CFR 262.34 (a)(4) – 265.35 Failure to maintain adequate aisle space for emergency response and inspections between the containers located in the storage areas to the right of the blender room door and near the HR-28 vacuum pump.

40 CFR 262.34 (a)(4) – 265.52 (c) Failure to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.

40 CFR 262.34 (c)(1) – 265.173 (a) Failure to keep five 55 gallon accumulation drums closed. These drums were located in the WWTP, the blender room, at the HR-28 vacuum pump (waste vacuum pump oil D001, F003, F005) vacuum pump #2 (waste vacuum pump oil D001, F003, F005), and at the DCH filter pad container near vacuum pump #2.

Nc D091572073

Robbey Nelms

STATE OF NORTH CAROLINA
COUNTY OF NEW HANOVER

IN THE OFFICE OF
ADMINISTRATIVE HEARINGS
03 EHR 0901

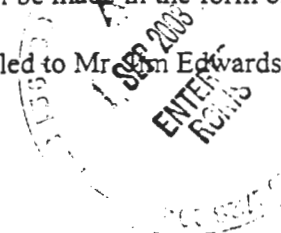
PRESSURE CHEMICAL CO.,)
)
Petitioner)
)
v.)
)
N. C. DIVISION OF WASTE MANAGEMENT,)
N.C. DEPARTMENT OF ENVIRONMENT)
AND NATURAL RESOURCES,)
)
Respondent.)

SETTLEMENT AGREEMENT

The North Carolina Department of Environment and Natural Resources, through its Division of Waste Management (hereinafter "the Division"), and Pressure Chemical Co. (hereinafter "PCC"), hereby enter into this Settlement Agreement in order to amicably resolve matters in controversy between them. This matter arose out of the Division Director's issuance of a Compliance Order with Administrative Penalty against PCC on April 30, 2003, Docket # 2003-038, for alleged violations of the laws and rules governing the management of hazardous waste, as contained in Article 9 of Chapter 130A of the North Carolina General Statutes, and 15A N.C.A.C. 13A.

Based on informal settlement discussions between the parties, and the Division's consideration of additional information, and without any trial of fact or law in a contested case hearing, and without any admissions of liability or error, the Division and PCC have reached the following agreement:

A. PCC will pay to the Division a recomputed penalty in the amount of \$34,000.00 in settlement of the Compliance Order with Administrative Penalty. The recomputed penalty will be paid in two (2) equal installments of \$17,000.00 each. The first installment is due on November 1, 2003. The second and final installment is due on January 31, 2004. Payments shall be made in the form of a check or money order, payable to the Division of Waste Management, and mailed to Mr. Tom Edwards,



Hazardous Waste Section, Division of Waste Management, 401 Oberlin Road, Suite 150, Raleigh, NC 27605.

B. PCC expressly stipulates and acknowledges that, by entering into this Settlement Agreement, it waives for purposes of collection of the above-described recomputed penalty, any and all defenses to the underlying assessment of said penalty; and that the issue in any action to collect said penalty will be limited to the payment or non-payment thereof in accordance with the terms of this Settlement Agreement.

C. The Division agrees to accept the payment of the recomputed penalty in complete satisfaction of the original penalty assessed in the Compliance Order with Administrative Penalty, subject to the terms of this Settlement Agreement, and subject further to the Division's reservation of its right to allege in future proceedings, that facts, events, or conditions described in the Compliance Order with Administrative Penalty evidence a recurring or repeat violation of applicable law.

D. PCC expressly waives its right to an administrative hearing on the April 30, 2003, Compliance Order with Administrative Penalty. Within ten (10) days of the full execution of this Settlement Agreement, PCC will file with the Office of Administrative Hearings a withdrawal with prejudice of its Petition for a Contested Case Hearing.

E. Nothing in this Settlement Agreement shall restrict the right of the Division to inspect or take enforcement action against PCC for any new, subsequent or repeat violations of Article 9 of Chapter 130A of the North Carolina General Statutes, and the State's Hazardous Waste Management Rules, codified at 15A N.C.A.C. 13A, or the right of PCC to contest any subsequent enforcement action based on allegations of new, subsequent or repeat violations, to the extent such right is provided by law.

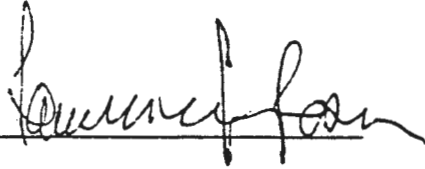
F. It is understood and agreed that any payment made pursuant to this Settlement Agreement is not to be construed as an admission of liability on the part of PCC, and that this settlement is a compromise of a disputed claim.

G. PCC represents that all necessary corporate formalities have been complied with for

purposes of its signing and entering into this Settlement Agreement.

This the 20th day of August, 2003.

FOR PRESSURE CHEMICAL CO.:

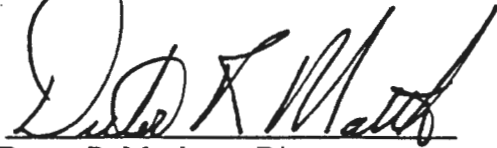


Name

CEO

Title

FOR THE DIVISION OF WASTE
MANAGEMENT:



Dexter R. Matthews, Director
Division of Waste Management

Bobby Melius

STATE OF NORTH CAROLINA
COUNTY OF NEW HANOVER

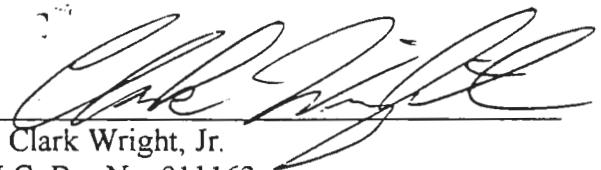
IN THE OFFICE OF
ADMINISTRATIVE HEARINGS
FILE NO. 03-EHR-0901

PRESSURE CHEMICAL CO.)
)
Petitioner,)
)
v.)
)
N.C. DIVISION OF WASTE)
MANAGEMENT, N.C. DEPT.)
OF ENVIRONMENT AND)
NATURAL RESOURCES,)
)
Respondent.)

NOTICE OF VOLUNTARY
DISMISSAL, WITH PREJUDICE
N.C.R.C.P. 41(a)

NOW COMES PETITIONER, by and through counsel, pursuant to Rule 41(a) of the North Carolina Rules of Civil Procedure, and OAH Rules .0101(1) and .0106, and after first informing the Administrative Law Judge that all matters in dispute have satisfactorily been resolved pursuant to the terms of a written Settlement Agreement between the parties, Petitioner now voluntarily dismisses its petition and this contested case proceeding, with prejudice.

This the 29th day of August, 2003.



I. Clark Wright, Jr.
N.C. Bar No. 011163
Ward and Davis, LLP.
409 Pollock Street
New Bern, NC 28560
252-633-1101
252-633-9400 (fax)
Attorneys for Petitioner

RECEIVED

SEP 2 - 2003

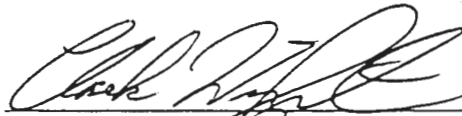
N.C. ATTORNEY GENERAL
Environmental Division

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the forgoing NOTICE OF VOLUNTARY DISMISSAL, WITH PREJUDICE has been served on the parties of record by depositing a copy of the same in the care of the United States Post Service, postage prepaid, addressed as follows:

Kathleen Waylett, Esq.
N.C. Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629

This the 29th day of August, 2003.



I. Clark Wright, Jr.
N.C. Bar No. 011163
Ward and Davis, LLP.
409 Pollock Street
New Bern, NC 28560
252-633-1101
252-633-9400 (fax)
Attorneys for Petitioner

Hazardous Waste Section, Division of Waste Management, 401 Oberlin Road, Suite 150, Raleigh, NC 27605.

B. PCC expressly stipulates and acknowledges that, by entering into this Settlement Agreement, it waives for purposes of collection of the above-described recomputed penalty, any and all defenses to the underlying assessment of said penalty; and that the issue in any action to collect said penalty will be limited to the payment or non-payment thereof in accordance with the terms of this Settlement Agreement.

C. The Division agrees to accept the payment of the recomputed penalty in complete satisfaction of the original penalty assessed in the Compliance Order with Administrative Penalty, subject to the terms of this Settlement Agreement, and subject further to the Division's reservation of its right to allege in future proceedings, that facts, events, or conditions described in the Compliance Order with Administrative Penalty evidence a recurring or repeat violation of applicable law.

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E. Nothing in this Settlement Agreement shall restrict the right of the Division to inspect or take enforcement action against PCC for any new, subsequent or repeat violations of Article 9 of Chapter 130A of the North Carolina General Statutes, and the State's Hazardous Waste Management Rules, codified at 15A N.C.A.C. 13A, or the right of PCC to contest any subsequent enforcement action based on allegations of new, subsequent or repeat violations, to the extent such right is provided by law.

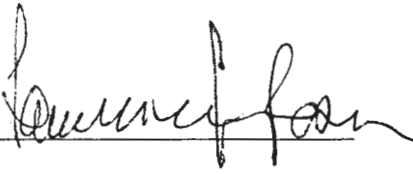
F. It is understood and agreed that any payment made pursuant to this Settlement Agreement is not to be construed as an admission of liability on the part of PCC, and that this settlement is a compromise of a disputed claim.

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This the 20th day of August, 2003.

FOR PRESSURE CHEMICAL CO.:

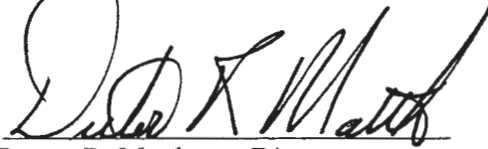


Name

CEO

Title

FOR THE DIVISION OF WASTE
MANAGEMENT:



Dexter R. Matthews, Director
Division of Waste Management

Bobby Nelms

STATE OF NORTH CAROLINA
COUNTY OF NEW HANOVER

IN THE OFFICE OF
ADMINISTRATIVE HEARINGS
03 EHR 0901

PRESSURE CHEMICAL CO.,)
)
 Petitioner)
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 v.)
)
 N. C. DIVISION OF WASTE MANAGEMENT,)
 N.C. DEPARTMENT OF ENVIRONMENT)
 AND NATURAL RESOURCES,)
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 Respondent.)

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Hazardous Waste Section, Division of Waste Management, 401 Oberlin Road, Suite 150, Raleigh, NC 27605.

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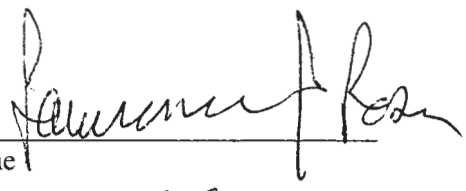
F. It is understood and agreed that any payment made pursuant to this Settlement Agreement is not to be construed as an admission of liability on the part of PCC, and that this settlement is a compromise of a disputed claim.

G. PCC represents that all necessary corporate formalities have been complied with for

purposes of its signing and entering into this Settlement Agreement.

This the 26th day of August, 2003.

FOR PRESSURE CHEMICAL CO.:

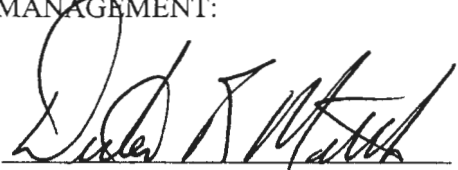


Name

CEO

Title

FOR THE DIVISION OF WASTE
MANAGEMENT:



Dexter R. Matthews, Director
Division of Waste Management



Bobby Holmes

State of North Carolina

Department of Justice

ROY COOPER
ATTORNEY GENERAL

P. O. Box 629
RALEIGH
27602-0629

Reply To:
Kathleen M. Waylett
Environmental Division
(919) 716-6600
(919) 716-6939

August 18, 2003

FOR SETTLEMENT PURPOSES ONLY

VIA TELECOPIER (252-633-9400)

I. Clark Wright, Jr., Esquire
Ward and Davis, L.L.P.
Post Office Drawer 1428
New Bern, North Carolina 28563

Re: Pressure Chemical Co. v. N.C. Department of Environment and Natural Resources, 03 EHR 0901

Dear Clark:

This is to summarize the response of the Division of Waste Management ("Division") to the settlement proposal submitted by Pressure Chemical Co. ("PCC") on June 25, 2003, in connection with the above-referenced matter. This letter amends and supersedes my earlier letter dated August 11, 2003.

The settlement proposal was submitted following the settlement meeting held on July 16, 2003. At that meeting, Mr. Larry Rosen, President of PCC, and Ms. Jo Ellen Elixson, PCC's current primary environmental compliance official, reviewed the actions taken and procedures put in place to address all matters noted during the compliance inspection conducted on October 30, 2003. The Division recognizes Mr. Rosen's and Ms. Elixson's commitment to ensuring full compliance with the laws and rules governing the management of hazardous waste at PCC's Leland facility.

You have asked that we state that there was no actual harm to any person or the environment resulting from the violations identified during the inspection. The Division has not conducted an investigation or assessment of actual harm, and the Division is not aware of any

I. Clark Wright, Jr., Esq.
August 18, 2003
Page 2

actual harm associated with the violations. For purposes of determining an appropriate penalty, the Division has assumed that there was no actual harm to public health or the environment.

A total penalty of \$47,500.00 was assessed in the Compliance Order issued on April 30, 2003. For settlement purposes only, and based on the additional information submitted during the settlement meeting held on July 16, 2003, your letter and attachments dated July 25, 2003, and subsequent settlement discussions between the parties, the Division proposes a total penalty of \$34,000.00, recomputed as follows:

1. Paragraphs 9.a. and e. in the Compliance Order - open containers and inspections.

PCC was cited for violation of 40 CFR 262.34(a)(1)(i), 262.34(c)(1)(i) and 15A NCAC 13A .0107(d), since it failed to keep containers closed and failed to comply with inspection requirements. PCC does not deny the violations, but notes that not all open containers observed during the inspection contained hazardous waste; PCC contends that some of the material was being staged until its customers could determine if the material was waste. The Division has agreed to work with PCC while it develops best management practices to address this issue. PCC has explained that some containers had been left open to allow materials to vent. PCC has identified and will use appropriate venting devices to address these problems. While there may have been fewer open containers than the number cited during the inspection, there were, in fact, open containers of hazardous waste. Additionally, there were containers of waste which had never been inspected.

The degree of harm presented by this group of violations is reduced to moderate. The deviation from the regulations is major. The Division has determined that \$22,000.00 is an appropriate penalty for this violation.

2. Paragraph 9.c. in the Compliance Order - training.

PCC was cited for violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107(d), since it failed to comply with the requirements of 40 CFR 265.16(c). PCC admits that it failed to conduct update training for Jason Aull within the time required by Section 265.16. The Division notes that Mr. Aull had received initial training. The update training, while late, was provided before the October 30th inspection.

The degree of harm presented by this violation is minor. The deviation from the regulations is reduced to moderate. The failure to meet training requirements was a repeat violation. The Division has determined that \$1,650.00 is an appropriate penalty for this violation.

I. Clark Wright, Jr., Esq.
August 18, 2003
Page 3

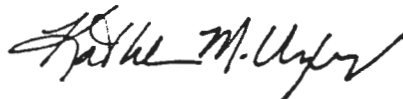
3. Paragraphs 9.b. and d. in the Compliance Order - labeling, prevention and contingency plan.

PCC was cited for violation of 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107(d), since it failed to label containers of hazardous waste. PCC was cited for violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107(c), since it failed to comply with certain requirements of Subparts C and D of 40 CFR Part 265. PCC has committed to developing best management practices which will address its procedures for filling and emptying totes used to accumulate hazardous waste. PCC will maintain appropriate aisle space where ever containers of hazardous waste are stored. PCC did, in fact, have in place arrangements with local emergency responders to address a response at the facility if needed. PCC has modified its contingency plan to reflect these arrangements.

The degree of harm presented by this group of violations will be reduced to moderate. The deviation from the regulations is major. The Division has determined that \$10,350.00 is an appropriate penalty for this violation.

Based on a careful review of all information and documentation submitted to date, we believe that a total recomputed penalty in an amount of \$34,000.00 represents a fair resolution of this matter. Please note that this amount is offered for purposes of settlement only, and has been determined prior to the conduct of formal discovery, which may reveal additional factors to be considered. Please give me a call if you have any questions or would like to discuss this matter further.

Sincerely,



Kathleen M. Waylett
Assistant Attorney General

MEMO

Date: 28 July 2003

To: File

Subject: Pressure Chemical

I met with Jo Ellen Elixson at Pressure Chemical in Leland, NC to discuss the pictures taken during the October 2002 inspection. A copy of all the photos was left with her.

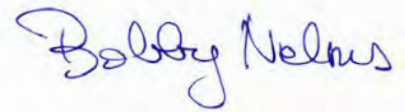
I also answered some of her questions about 90 day storage areas and weekly inspection logs.

From: Bobby Nelms



North Carolina Department of Environment
and Natural Resources



**WARD AND DAVIS, LLP**
ATTORNEYS AT LAWALFRED D. WARD
ALFRED D. WARD, JR.
JOHN A. J. WARD
MICHAEL SCOTT DAVIS
I. CLARK WRIGHT, JR.400 POOL LOCK STREET
PO DRAWER 1428
NEW BERN, NC 28543
252-433-1181 FAX 252-433-9400
icw@wardanddavis.com

July 25, 2003

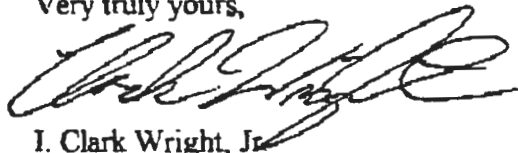
VIA FACSIMILE. ORIGINAL VIA U.S. MAILKathleen Waylett, Esq.
N.C. Department of Justice
P.O. Box 629
Raleigh, NC 27602RE: Pressure Chemical Company
NCD-091-572-073
Docket # 2003-038
Proposed Compliance Order/Penalty Settlement**Confidential Settlement Communication**

Dear Kathleen:

Thank you and the members of the DWM/HWS for taking the time to meet on July 16, 2003 with Larry Rosen, Jo Ellen Elixson, and me. The purpose of this letter is to present, on behalf of Pressure Chemical Company ("PCC"), a confidential proposal for settlement of the April 30, 2003 Compliance Order/Penalty issued by DWM/HWS, which PCC subsequently appealed. This settlement proposal is a confidential settlement offer regarding a matter in litigation; it therefore should be held in strict confidence. It is my understanding that you will share this proposal with your client, but that it will not become a public document unless a final settlement agreement is reached, in which case it will become part of the public records of DWM.

On behalf of PCC, let me thank you in advance for your attention to this matter. Should you have any questions or need clarification as to any of the enclosed materials, please do not hesitate to give me a call. In that regard, I am

Very truly yours,

I. Clark Wright, Jr.
ICW:icw
Enclosures
cc: Mr. Larry Rosen

Confidential Settlement Proposal
DWM/HWS Docket No. 2003-038
OAH Case No. 03-EHR-0901
Pressure Chemical Co.; NCD-091-572-073

Introduction

On April 30, 2003, the Division of Waste Management ("DWM"), Hazardous Waste Section ("HWS") issued a Compliance Order with Administrative Penalty ("Order") against Pressure Chemical Co. ("PCC") regarding alleged violations of the North Carolina Solid Waste Management Act and implementing regulations at PCC's Leland, North Carolina specialty chemical manufacturing facility. The Order imposed a civil penalty in the total amount of \$47,500.00, based on finding two major and one minor violations. PCC timely filed an administrative appeal and requested an informal settlement meeting. On July 16, 2003, the parties met in Raleigh, NC to discuss the potential for informal settlement. This confidential settlement proposal is made by PCC in follow-up to the positive discussions that took place during the July 16, 2003 meeting.

Background

PCC was founded in 1964 as a Pennsylvania Corporation. It has continuously operated a manufacturing site in Pittsburgh, Allegheny County, Pennsylvania, since April, 1964, and there has achieved very high standards of safety, health and environmental compliance. It has been recognized by LEPC, the Western PA Safety Council and its peers nationally for its positive public safety and environmental compliance records. The workforce in Pittsburgh, numbering over forty at all times for the past ten years, has suffered only a single lost-time accident over the most recent ten year period, the last in April, 1999. In January, 1999, the Company celebrated its safety record (and consequent direct and indirect cost savings) by rewarding all employees and their significant others with an all-expense-paid company vacation.

The business strategy of PCC is to leverage its relationships with process development clients, continuing to manufacture the specialty and fine chemical requirements of these companies after the initial market development period. Much of the work performed in Pittsburgh relates to the scale-up of laboratory processes and the first manufacturing campaigns of new chemical substances and polymers on a significant scale. As time passes, the markets for these materials either fail to develop and the project ends or they begin to grow and develop but, typically, remain too small to interest large company customers in manufacturing on their own sites. In many cases, the manufacturing is outsourced. It is a convenience and cost savings to PCC customers if the company and its facilities are in a good position geographically and economically to continue to manufacture materials on a larger commercial scale. In so doing, the customer's confidential technology and know-how need not be transferred to yet another entity.

With this strategy in mind, in the early 1990's, PCC began to search for a second facility site with infrastructure capable of practicing similar technologies, thereby allowing PCC

to expand its specialty chemical manufacturing capabilities while maintaining the company's high standards of quality control, employee safety, public safety and environmental compliance.

Leland, North Carolina Facility

On or about November 1, 1992, PCC obtained an interest in the existing chemical manufacturing facilities located in Leland, North Carolina. The assets of the former National Starch and Chemicals site were acquired by a newly formed North Carolina corporation, in which PCC held a minority shareholder interest. At this time, the responsibility for compliance with all applicable requirements of the North Carolina Solid Waste Management Act rested with CT Specialties Corporation. On January 1, 2002, PCC acquired the assets of CT Specialties, comprising principally the Leland, NC facility. At this time, PCC first became responsible for operation of the site, including compliance with all applicable environmental and public safety laws and regulations.

PCC marketing and sales activity, though located principally in Pittsburgh, focuses primarily on the Leland, NC facility. In nearly all cases today, the sales focus is to grow the capacity and business base in North Carolina, the research and developmental activities taking place in Pittsburgh. The Pittsburgh location has operated profitably since 1975 and has become known in its industry segment as one of the finest facilities of its kind. PCC has brought numerous innovations to the industry and is widely imitated. Its customers bring their highest profile and most critical requirements to PCC because of their high expectations for success at the developmental stage and the understanding that PCC's technical discipline and business philosophy will be applied with equal results at PCC's Leland, NC facility. Each of these key customers has visited the Leland, NC site as well as the Pittsburgh site before committing to doing business with PCC. It is absolutely critical to the continued success of PCC that each site is perceived as adhering to the same high standards of quality control, human safety and regulatory compliance.

The October 30, 2002 HWS Inspection

On October 30, 2002, DWM/HWS officials conducted an unannounced inspection of PCC's Leland, NC facility. When the DWM/HWS officials presented their credentials, a temporary, part-time receptionist referred them to Mr. Tim Williams. At that time, Mr. Williams' title was that of "Project Coordinator." Mr. Williams did not notify any other more senior or experienced personnel at the facility (the plant manager was out that day), and did not make arrangements for any other PCC officials or employees to accompany the DWM/HWS officials on their inspection tour, or assist in answering questions. Instead, Mr. Williams proceeded alone with the DWM/HWS officials during the entire inspection tour. During the course of the inspection tour, upon information and belief, Mr. Williams made erroneous and incomplete statements to the DWM/HWS inspectors.

The PCC Settlement Proposal

The DWM/HWS Order identifies five categories of alleged violations (see Paragraph 9), and concludes with three civil penalty assessments using the agency's standard penalty "matrix." Two of the three civil penalty assessments are characterized on the matrix as "major" violations - both in terms of degree of deviation from requirements, and nature and degree of harm. PCC disagrees with characterization of the alleged violations as representing a "major" deviation from requirements, or as involving a "major" degree of harm. It is PCC's understanding that all concerned agree that there was no actual damage or harm to employees, the public or the environment. In this context, analysis of the penalty matrix's "harm" component necessarily rests upon a somewhat speculative analysis of *potential* harm(s). In undertaking such an analysis, PCC requests that DWM/HWS take into account the company's four-decade record of exemplary employee safety and regulatory compliance, the swift and significant measures taken by PCC post-inspection, and the fact that PCC had assumed responsibility for such compliance at the Leland facility less than nine months prior to the inspection date.

In addition, PCC requests that DWM/HWS take into account the fact that, because the Leland, NC facility often utilizes a number of highly flammable liquids and gases in its normal daily operations, the facility has in place (and had in place at the time of the inspection) all appropriate means, both engineering and procedural, necessary to eliminate potential sources of ignition. All equipment and devices in the Leland facility adhere to appropriate electrical standards for explosive atmospheres; electrical grounding is employed for transfers of liquids; and personnel are trained and retrained with respect to potential for ignition. All containers noted were stored in diked areas where any actual spillage would be contained and not released to the ground or water.

As discussed in more detail during the July 16, 2003 meeting, PCC has instituted a number of post-inspection procedural changes at the Leland, NC facility. These changes are designed to improve environmental compliance record keeping, assure proper labeling and tracking of all hazardous waste, and streamline lines of authority for purposes of environmental compliance. The designation of veteran employee Jo Ellen Elixson as the primary environmental compliance official at the Leland facility, and the establishment of a direct line of authority between Ms. Elixson and CEO Larry Rosen provide important, further assurances of improved regulatory compliance. It is our understanding that DWM/HWS staff conducted a very recent, follow-up visit to PCC's Leland, NC facility to document follow-up compliance status; upon information and belief, the results of this recent site visit were positive.

For these reasons, and all other reasons discussed during the July 16, 2003 informal settlement meeting (e.g. numbering of totes, leave without pay enforcement of shift personnel, regular schedule for destruction of stained/used totes, etc.) and elsewhere in this proposal and enclosures, PCC requests that DWM/HWS settle this matter by reclassifying the degree of harm as minor or moderate, as set forth in more detail below.

For purposes of this confidential settlement proposal, PCC will address separately each of the five categories outlined in Paragraph 9 of the DWM/HWS Order. As to each of these five categories, PCC proposes to settle as follows:

Paragraph 9(a) [40 CFR 262.34(a)(1)(i)]: PCC proposes that the alleged violations for open totes and weekly inspections be settled by identification of such alleged violations as "moderate" in terms of deviation and degree of potential harm, with a total civil penalty assessment in the amount of \$5,500.00.

Paragraph 9(b) [40 CFR 262.34(a)(3)]: PCC proposes that the alleged labeling violations be settled by identification of such as "moderate" in terms of deviation and degree of potential harm, with a total civil penalty assessment in the amount of \$7,500.00.

Paragraph 9(c) [40 CFR 262.34(a)(4)]: PCC proposes that the alleged annual review training violation be settled by identification of such as "minor" in terms of deviation and degree of potential harm, with a total civil penalty assessment in the amount of \$500.00. All employees had, in fact, received the appropriate training, as documented by the records, before the inspection. PCC had recognized the deviation and corrected it voluntarily as soon as it was discovered.

Paragraph 9(d) [40 CFR 262.34(a)(4)]: PCC proposes that the alleged leaking container, aisle space and local public safety responder arrangement violations be resolved by identification of such as "moderate" in terms of deviation and "minor" in degree of potential harm, with a total civil penalty assessment in the amount of \$1,500.00. While two totes may have appeared to the inspectors to have had active leak stains on their sides, PCC strongly believes that these totes were not, in fact actively or recently leaking, but rather had become permanently stained in the past due to filling operations. [See enclosures.] As to emergency response issues, PCC believes that local public safety responder arrangements were clear and understood by the agencies involved and that the violation in this regard was a minor issue of documentation, and clarity of documentation. PCC admits that there were temporary aisle space violations, which were corrected very shortly after the inspection.

Paragraph 9(e) [40 CFR 262.34(c)(1)(i)]: PCC proposes that the alleged open container and/or failure to keep inspection record violations be resolved by characterization of such as "moderate" in terms of deviation and degree of potential harm, with a total civil penalty assessment in the amount of \$6,500.00.

Pursuant to the above, PCC proposes to pay a total civil penalty of \$21,500.00 for five "moderate" and "minor" violations in order to resolve all matters identified in the Order.

Supporting Legal Analysis

The statutory authority for DWM's Order is found at G.S. 130A-22(a), 130A-22(d), and 130A-22(f). Pursuant to 130A-22(a), the Secretary of DENR (and through delegation, the DWM) has authority to assess administrative penalties against persons who violate Article 9 of Chapter 130A (solid and hazardous waste requirements). Pursuant to 130A-22(d), the Secretary (and DWM) "shall consider the degree and extent of the harm caused by the violation and the cost of rectifying the damage." Pursuant to 130A-22(f), rules must be adopted concerning imposition of the various administrative penalties authorized under Article 9 of Chapter 130A.

The most relevant statutory language authorizing administrative penalty assessments by DWM is that found in 130A-22(d). Pursuant to this law, DWM must focus its primary attention on the degree of the harm caused by the alleged violations, and the costs (if any) of rectifying damage (if any). As documented in this settlement proposal and enclosures, along with the relevant penalty assessment documents, there was no actual harm to persons or the environment associated with the alleged PCC violations. Neither is there any evidence of "damage" or costs of rectifying "damage." While the rules promulgated by the Commission, as interpreted by DWM purport to include concepts of potential harm to persons or the environment, the specific language of the primary statute confirm that the General Assembly's primary emphasis is on actual harm and related damage to persons or the environment.

PCC identifies the legal issue of scope of DWM's administrative penalty authority not because it wishes to litigate this issue, but rather to emphasize that the primary concerns of the General Assembly were directed towards preventing actual harm to persons or the environment, and rectifying actual damage. In that context, PCC respectfully asserts that it must be conceded that the alleged violations contained in the Order did not involve any actual harm or damage, or any costs to rectify damage. Instead, the alleged violations in the Order are based on the premise that alleged procedural violations, if left unchecked, could potentially lead to future, actual harm to persons or the environment. In such a context, PCC believes that DWM should exercise significant, downward settlement discretion, both as to the classification of violations, and corresponding penalty amounts.

In carrying out its discretion, DWM initially is guided by the standards set forth in the rules at 15A NCAC 13B.0702(1)(a). The rule repeats some of the language contained in 130A-22(d) regarding the degree of harm, but adds a new concept - "nature of the violation." DWM is then to consider: (i) type of violation; (ii) type of waste involved; (iii) duration of the violation; (iv) cause; (v) potential effects on public health and the environment; (vi) effectiveness of response measures; and (vii) damage to private property.

With regard to estimates by DWM as to the possible duration of any violations as alleged in the Order, PCC requests that DWM not take into account any duration period prior to January 1, 2002, the date on which PCC first became responsible for compliance at the Leland, NC facility. PCC further requests that DWM not apply any adverse duration

analysis to interpretations of the term "weekly" as meaning exactly 7 days or less in light of the fact that this term is not so defined in the applicable rules (state or federal), the fact that PCC records indicate inspection compliance took place within 8 or 9 day periods, the fact that prior DWM inspections of this facility when owned by other companies did not identify this as a violation, and the fact that PCC immediately responded by changing its inspection procedures to comply with DWM's 7-day interpretation.

With regard to alleged causes of violations as identified in the Order, PCC requests that DWM factor in the unique nature of PCC's specialty chemical business, the fact that PCC strongly believes that there were no actual tote leaks, the fact that local emergency response personnel did in fact have accurate information regarding response plans for the facility, the positive nature of PCC's response to the issues raised in the inspection report and Order, and the relatively brief duration of PCC's responsibility for compliance at the Leland, NC facility.

With regard to potential effects on public health and the environment, PCC requests that DWM take into account the absence of any actual harm to persons or the environment - not only at the time of the inspection, but during PCC's decades long period of exemplary employee and public safety and environmental compliance at all company facilities.

With regard to the effectiveness of response measures taken, PCC requests that DWM take into account the positive nature of the actions taken by PCC officials, including the direct involvement of PCC's chief executive officer, the direct, positive involvement of Ms. Jo Ellen Elixson at the Leland, NC facility, the many procedural changes made at the Leland, NC facility, and the improved lines of communication between DWM staff and PCC officials at the highest levels within the company.

With regard to the damage to private property factor, PCC requests that DWM confirm that there was no damage to any private property, to public property, to any person, or to the environment as a result of the alleged violations contained in the Order.

Conclusion

Based on the information contained in this Settlement Proposal, enclosures, discussed at the July 16, 2003 meeting, and as contained in the DWM Order and related documents, PCC believes that the matters identified in the Order are appropriately resolved on the basis of the civil penalty amounts and matrix characterizations proposed herein.

Enclosures

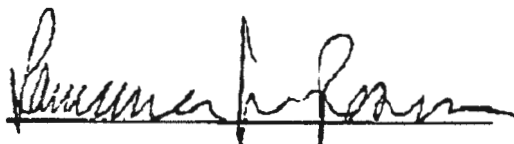
PRESSURE
CHEMICAL CO.

www.pressurechemical.com

Fine Chemical Division
3410 Smallman Street
Pittsburgh, PA 15201-1997
412-682-5882
fax 412-682-5864

Specialty Chemical Division
2271 Andrew Jackson Hwy., NE
PO Box 1956
Leland, NC 28451-1956
910-371-2234
fax 910-371-0351

I spent the week beginning December 2, 2002 at the Leland facility. I spent a great deal of time with Tim Williams, debriefing him on the events of the previous October 30th. Among the specific details that I can recall vividly is an inspection of the two stained totes containing wastes from the DCH production campaign. These totes were examined during that week and were found not to be leaking. The stains were characteristic of and were clearly produced by the action of DCH on organic material. To my personal knowledge from prior experience with these materials, there is no known manner to eliminate these stains. They can only be covered with an opaque coating. There was no liquid present on the sides of these totes at that time and no stains were observed at the bottoms.



July 25, 2003

larry rosen

From: Tim Williams [williams24@ecrr.com]
Sent: Wednesday, July 23, 2003 5:47 PM
To: larry rosen
Subject: RE: Questions re: Bobby Nelms' Inspection

Larry,

I remember the two totes you mentioned. They were stacked one on top of the other on the hazardous waste pad with DCH stains running from the cap rings most of the way down one side of the totes in a stream maybe one inch wide. I never indicated that the totes might have leaked. To the contrary, I told him that the stains on the totes were the result of the filling operation as you remembered. The totes still contained liquid at the time of the inspection, and there was no staining or discoloration on the pad at the bottom of the totes. His photos should show that. All of the staining on the totes occurred before they were moved to the waste pad.

No one from the Department of Waste Management contacted me after I sent my letter dated December 6, 2002.

Tim Williams
6221-11 Penny Lane
Wilmington, NC 28405
910-482-7226



PRESSURE CHEMICAL CO.

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About Us

Pressure Chemical Co. has a proven track record in maintaining a safe work environment. We have been members of the Western Pennsylvania Safety Council since 1988 and have received the Safety Council's Outstanding Achievement Award in recognition of outstanding accident prevention performance each year since 1994.



We can also boast of a well-trained, highly-skilled staff of chemical operators. Each of our chemical operators is SOCMA-certified, having successfully completed modules in:

- Mathematics
- Algebra
- Statistics
- Chemistry
- Physics
- Communications
- Reactor Systems
- Controls and Instrumentation
- Separation Systems
- Material Transfer
- Heat Transfer
- Utilities
- Unit Operations
- Maintenance

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service@presschem.com

MEMO

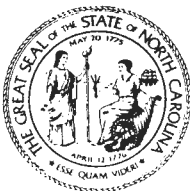
DATE: 24 July 2003

TO: Mike Williford

SUBJECT: Pressure Chemical

According to Jo Ellen Elison, the spray irrigation field is associated with the groundwater remediation of the National Starch site. The waste water from Pres. Chem's. WWTP is discharged to the POTW. It appears to me that her nitric acid solution would not be a solid waste and subject to the exclusion outlined in 261.2(e)(1)(ii).

From: Bobby Nelms



North Carolina Department of Environment,
Health, and Natural Resources



Printed on Recycled Paper

- (e) Materials that are not solid waste when recycled.
- (1) Materials are not solid wastes when they can be shown to be recycled by being:
 - (i) Used or reused as ingredients in an industrial process to make a product, provided the materials are not being reclaimed; or
 - (ii) Used or reused as effective substitutes for commercial products; or ←
 - (iii) Returned to the original process from which they are generated, without first being reclaimed or land disposed. The material must be returned as a substitute for feedstock materials. In cases where the original process to which the material is returned is a secondary process, the materials must be managed such that there is no placement on the land. In cases where the materials are generated and reclaimed within the primary mineral processing industry, the conditions of the exclusion found at §261.4(a)(17) apply rather than this paragraph.
 - (2) The following materials are solid wastes, even if the recycling involves use, reuse, or return to the original process (described in paragraphs (e)(1)(i) through (iii) of this section):
 - (i) Materials used in a manner constituting disposal, or used to produce products that are applied to the land; or
 - (ii) Materials burned for energy recovery, used to produce a fuel, or contained in fuels; or
 - (iii) Materials accumulated speculatively; or
 - (iv) Materials listed in paragraphs (d)(1) and (d)(2) of this section.
 - (2) Documentation of claims that materials are not solid wastes or are conditionally exempt from regulation. Respondents in actions to enforce regulations implementing Subtitle C of RCRA who raise a claim that a certain material is not a solid waste, or is conditionally exempt from regulation, must demonstrate that there is a known market or disposition for the material, and that they meet the terms of the exclusion or exemption. In doing so, they must provide appropriate documentation (such as contracts showing that a second person uses the material as an ingredient in a production process) to demonstrate that the material is not a waste, or is exempt from regulation. In addition, owners or operators of facilities claiming that they actually are recycling materials must show that they have the necessary equipment to do so.

261.3 Definition of hazardous waste.

- (a) A solid waste, as defined in Section 261.2 is a hazardous waste if:
- (1) It is not excluded from regulation as a hazardous waste under Section 261.4(b); and
 - (2) It meets any of the following criteria:
 - (i) It exhibits any of the characteristics of hazardous waste identified in Subpart C of this part. However, any mixture of a waste from the extraction, beneficiation, and processing of ores and minerals excluded under Section 261.4(b)(7) and any other solid waste exhibiting a characteristic of hazardous waste under subpart C is a hazardous waste only if it exhibits a characteristic that would not have been exhibited by the excluded waste alone if such mixture had not occurred or if it continues to exhibit any of the characteristics exhibited by the non-excluded wastes prior to mixture. Further, for the purposes of applying the Toxicity Characteristic to such mixtures, the mixture is also a hazardous waste if it exceeds the maximum concentration for any contaminant listed in table I to Section 261.24 that would not have been exceeded by the excluded waste alone if the mixture had not occurred or if it continues to exceed the maximum concentration for any contaminant exceeded by the nonexempt waste prior to mixture.
 - (ii) It is listed in Subpart D and has not been excluded from the lists in Subpart D under Sections 260.20 and 260.22 of this chapter.
 - (iii) It is a mixture of a solid waste and a hazardous waste that is listed in Subpart D of this part solely because it exhibits one or more of the characteristics of hazardous waste identified in Subpart C of this part, unless the resultant mixture no longer exhibits any characteristic of hazardous waste identified in Subpart C of this part, or unless the solid waste is excluded from regulation under Section 261.4(b)(7) and the resultant mixture no longer exhibits any characteristic of hazardous waste identified in subpart C of this part for which the hazardous waste listed in subpart D of this part was listed. (However, nonwastewater mixtures are still subject to the requirements of part 268 of this chapter, even if they no longer exhibit a characteristic at the point of land disposal).
 - (iv) It is a mixture of solid waste and one or more hazardous wastes listed in Subpart D and has not been excluded from this paragraph under Sections 260.20 and 260.22 of this chapter, however, the following mixtures of solid wastes and hazardous wastes listed in Subpart D are not hazardous wastes (except by application of paragraph (a)(2)(i) or (ii) of this Section) if the generator can demonstrate that the mixture consists of wastewater the discharge of which is subject to regulation

Subject: Pressure Chemical

Date: Fri, 18 Jul 2003 11:58:49 -0400

From: Robert Nelms <Robert.Nelms@NCmail.net>

To: mikewilliford <mike.williford@ncmail.net>,
ROBERT NELMS <ROBERT.NELMS@ncmail.net>

CC: Doug Holyfield <doug.holyfield@ncmail.net>, "Jill.Pafford" <jill.pafford@ncmail.net>

On 17 July 2003, Mike Williford and Bobby Nelms made an announced site visit to the Pressure Chemical site in Leland, NC. During the visit Ms. Jo Ellen Elixson gave a personal tour of the facility which covered all areas which had been discussed in the previous day's meeting.

A significant improvement in the facility's management of hazardous waste was observed during this visit as opposed to the 30 October 2002 inspection. Recommendations for further improvements in Pressure Chemical's hazardous waste program were given to Ms. Elixson during the visit. The overall attitude of personnel at the facility appears to be proactive and eager toward obtaining and maintaining compliance.



Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director

MEETING ATTENDANCE RECORD

Facility Pressure Chemical Company - Specialty Chemical Division

EPA ID NCD 091 572 073

Date July 16, 2003

Please complete the information requested below. Copies will be made available after the meeting.

Attending:	Representing:	Phone Number:
1. <u>Lebeed Kady</u>	<u>NC Hazardous Waste</u>	<u>919-733-2178 x 217</u>
2. <u>Michael Wilford</u>	<u>"</u>	<u>" x 213</u>
3. <u>Jenny Rankin</u>	<u>"</u>	<u>336-722-4852</u>
4. <u>Bobby Nelms</u>	<u>"</u>	<u>910-395-3900 Ext. 350</u>
5. <u>Jerry Ream</u>	<u>Pressure Chemical</u>	<u>412-682-5882 x 205</u>
6. <u>Jo Ellen Telixson</u>	<u>Pressure Chem.</u>	<u>910-371-2234 x. 11</u>
7. <u>Doug Holyfield</u>	<u>NC Hazardous Waste Section</u>	<u>336-771-4608 x 222</u>
8. <u>Kathleen Dayfert</u>	<u>Atty Gen. office, representing DWM/HWS</u>	<u>919-716-6600</u>
9. <u>Jill Pafford</u>	<u>NC HWS</u>	<u>(919) 733-2178 x 219</u>
10. <u>Helen Cotton</u>	<u>" "</u>	<u>919 733-2178 x 212</u>
11. <u>Clark Wright</u>	<u>Ward & Davis (for PCC)</u>	<u>252-633-1101</u>
12. <u>Larry Stinson</u>	<u>(Rescue Service)</u>	
13. <u>Jo Ellen Telixson</u>	<u>"</u>	

h:\elisabeth\attending

Employee/Course Detail

RANGE OF LEVELS: Pressure Chemical Co.

SELECTED EMPLOYEE/COURSE STATUSES: Absent, Complete, Failed, Passed

RANGE OF COURSE SESSION DATES: 09/01/2002 - 10/15/2002

SORTED BY: Employee Name

Employee

Name: Jason Aull **Shift:** Day **Job Title:** Production Manager **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/10/2002 To 10/10/2002	0204	-----	10:30 AM To 11:00 A

Employee

Name: Chris Barnett **Shift:** Day **Job Title:** Lab Technician **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/18/2002 To 09/18/2002	0202	-----	09:15 AM To 10:00 A

Employee

Name: Norbert Barrette **Shift:** Day **Job Title:** Facilities Manager **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/18/2002 To 09/18/2002	0202	-----	09:15 AM To 10:00 A

Employee

Name: Robert B. Bordeaux **Shift:** Day **Job Title:** WWTP Operator **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/17/2002 To 09/17/2002	0201	-----	08:00 AM To 08:45 A

Employee/Course Detail

RANGE OF LEVELS: Pressure Chemical Co.

SELECTED EMPLOYEE/COURSE STATUSES: Absent, Complete, Failed, Passed

RANGE OF COURSE SESSION DATES: 09/01/2002 - 10/15/2002

SORTED BY: Employee Name

Employee

Name: William Brampton **Shift:** C **Job Title:** Shift Supervisor **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/18/2002 To 09/18/2002	0202	-----	09:15 AM To 10:00 A

Employee

Name: John Brown **Shift:** B **Job Title:** Shift Supervisor **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/10/2002 To 10/10/2002	0204	-----	10:30 AM To 11:00 A

Employee

Name: Jeff Cox **Shift:** B **Job Title:** **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/11/2002 To 10/11/2002	0206	-----	09:30 AM To 10:00 A

Employee

Name: Jo Ellen Elixson **Shift:** Day **Job Title:** Office Manager **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/17/2002 To 09/17/2002	0201	-----	08:00 AM To 08:45 A

Employee/Course Detail

RANGE OF LEVELS: Pressure Chemical Co.

SELECTED EMPLOYEE/COURSE STATUSES: Absent, Complete, Failed, Passed

RANGE OF COURSE SESSION DATES: 09/01/2002 - 10/15/2002

SORTED BY: Employee Name

Employee

Name: Zebbie Green **Shift:** A **Job Title:** Shift Supervisor **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Complete	10/03/2002 To 10/03/2002	0203	R	07:00 AM To 07:30 A

Employee

Name: Charles Holden **Shift:** A **Job Title:** **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Complete	10/03/2002 To 10/03/2002	0203	R	07:00 AM To 07:30 A

Employee

Name: Steve Labarge **Shift:** D **Job Title:** Asst. Shift Supervisor **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/03/2002 To 10/03/2002	0203	R	07:00 AM To 07:30 A

Employee

Name: Scott Linnartz **Shift:** B **Job Title:** **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/10/2002 To 10/10/2002	0204	-----	10:30 AM To 11:00 A

Employee/Course Detail

RANGE OF LEVELS: Pressure Chemical Co.

SELECTED EMPLOYEE/COURSE STATUSES: Absent, Complete, Failed, Passed

RANGE OF COURSE SESSION DATES: 09/01/2002 - 10/15/2002

SORTED BY: Employee Name

Employee

Name: Pam Lyons **Shift:** Day **Job Title:** Project Manager Trainee **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/18/2002 To 09/18/2002	0202	-----	09:15 AM To 10:00 A

Employee

Name: Anthony Massey **Shift:** D **Job Title:** **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/03/2002 To 10/03/2002	0203	R	07:00 AM To 07:30 A

Employee

Name: Steve McGinn **Shift:** C **Job Title:** Asst. Shift Supervisor **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/17/2002 To 09/17/2002	0201	-----	08:00 AM To 08:45 A

Employee

Name: Randy Newman **Shift:** Day **Job Title:** **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/18/2002 To 09/18/2002	0202	-----	09:15 AM To 10:00 A

Employee/Course Detail

RANGE OF LEVELS: Pressure Chemical Co.

SELECTED EMPLOYEE/COURSE STATUSES: Absent, Complete, Failed, Passed

RANGE OF COURSE SESSION DATES: 09/01/2002 - 10/15/2002

SORTED BY: Employee Name

Employee

Name: Christian Pigott Shift: C Job Title: Department: Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/17/2002 To 09/17/2002	0201	-----	08:00 AM To 08:45 A

Employee

Name: Reggie Rathburn Shift: C Job Title: Department: Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/18/2002 To 09/18/2002	0202	-----	09:15 AM To 10:00 A

Employee

Name: Alfred Smith Shift: Day Job Title: Warehouseman Department: Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/10/2002 To 10/10/2002	0204	-----	10:30 AM To 11:00 A

Employee

Name: Joseph B. Stevens Shift: A Job Title: Department: Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Complete	10/03/2002 To 10/03/2002	0203	R	07:00 AM To 07:30 A

Employee/Course Detail

RANGE OF LEVELS: Pressure Chemical Co.

SELECTED EMPLOYEE/COURSE STATUSES: Absent, Complete, Failed, Passed

RANGE OF COURSE SESSION DATES: 09/01/2002 - 10/15/2002

SORTED BY: Employee Name

Employee

Name: Archie Stone **Shift:** C **Job Title:** **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Complete	09/17/2002 To 09/17/2002	0201	-----	08:00 AM To 08:45 A

Employee

Name: Lathan Webb **Shift:** D **Job Title:** **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/10/2002 To 10/10/2002	0204	-----	10:30 AM To 11:00 A

Employee

Name: William West **Shift:** Day **Job Title:** Maintenance Technician **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	10/11/2002 To 10/11/2002	0205	F	07:30 AM To 08:00 A

Employee

Name: Tim Williams **Shift:** Day **Job Title:** SHE Manager **Department:** Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/17/2002 To 09/17/2002	0201	-----	08:00 AM To 08:45 A

Employee/Course Detail

RANGE OF LEVELS: Pressure Chemical Co.

SELECTED EMPLOYEE/COURSE STATUSES: Absent, Complete, Failed, Passed

RANGE OF COURSE SESSION DATES: 09/01/2002 - 10/15/2002

SORTED BY: Employee Name

Employee

Name: James G. Wooten

Shift: Day

Job Title: Water Quality Manager


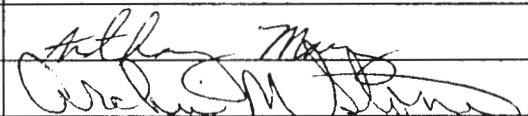

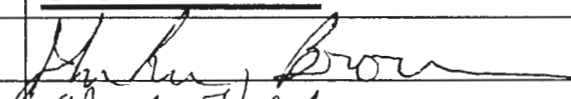
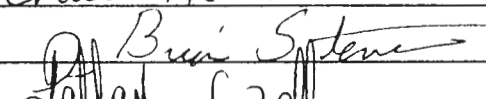
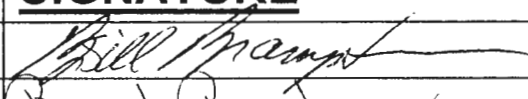
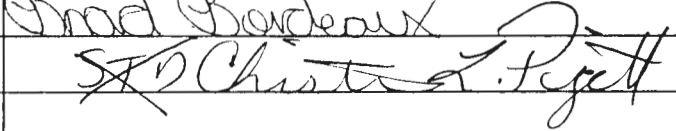
Department: Pressure Chemical Co.

<u>Course Name</u>	<u>Required By</u>	<u>Status</u>	<u>Dates Scheduled</u>	<u>Session#</u>	<u>Days of Week Scheduled</u>	<u>Times Scheduled</u>
RCRA Annual Training	EPA	Passed	09/18/2002 To 09/18/2002	0202	-----	09:15 AM To 10:00 A

C.T. Specialties Training Record**Course Description:**

Haz Waste Refresher

Instructor: Tom Kurtz

<u>A-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Shawn Hudson		7-30-01
Rudy Azcona	LTD	
Anthony Massey		7-30-01
Archie Stone		
<u>B-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
John Brown		7/30/01
Charles Holden	Charles Holden	7-30-01
Brian Stevens		7-30-01
Lathan Webb	Lathan Webb	7-30-01
<u>C-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Bill Brampton		8/12/01
Brad Bordeaux	Brad Bordeaux	7-30-01
Christian Pigott		12-21-01

C.T. Specialties Training Record

Course Description:

*Haz Waste Refresher
& Emergency Response*

Instructor: *Tom Kutz*


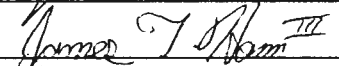
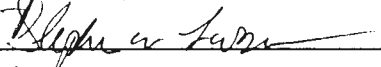
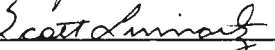
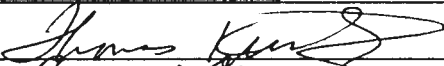




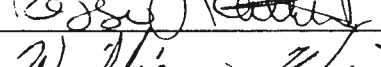
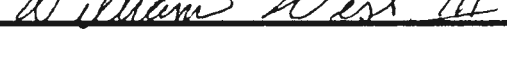
<u>A-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Shawn Hudson	<i>[Signature]</i>	<i>7-30-01</i>
Rudy Azcona	<i>LTD</i>	
Anthony Massey	<i>[Signature]</i>	<i>7-30-01</i>
Archie Stone	<i>[Signature]</i>	
<u>B-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
John Brown	<i>[Signature]</i>	<i>7/30/01</i>
Charles Holden	<i>[Signature]</i>	<i>7-30-01</i>
Brian Stevens	<i>[Signature]</i>	<i>7-30-01</i>
Lathan Webb	<i>[Signature]</i>	<i>7-30-01</i>
<u>C-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Bill Brampton	<i>[Signature]</i>	<i>8/10/01</i>
Brad Bordeaux	<i>[Signature]</i>	<i>7-30-01</i>
Christian Pigott	<i>[Signature]</i>	<i>12-21-01</i>

C.T. Specialties Training Record

Course Description:

Haz Waste Refresher
& Emergency Response

Instructor: Tom KUNTZ


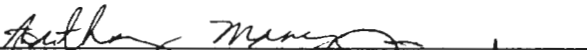
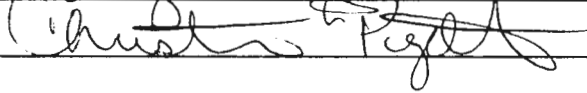
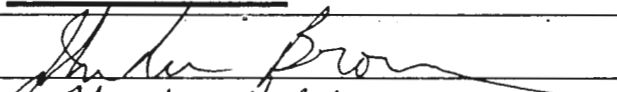
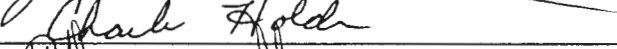
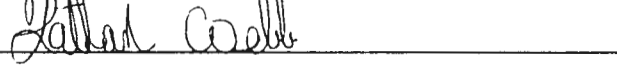
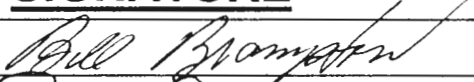

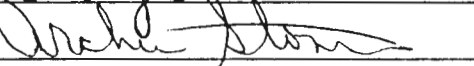
<u>D-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Zeke Green		7/30/01
Jamie Ham		7/30/01
Steve LaBarge		7-30-01
Scott Linnartz		7-30-01
<u>Operations</u>	<u>SIGNATURE</u>	<u>DATE</u>
Tom Kuntz		
Al Smith		8-10-01
<u>Maintenance</u>	<u>SIGNATURE</u>	<u>DATE</u>
Norbert Barrette		7/27/01
Jeff Cox		12/21/01
Terry Malpass		12-13-01
Reggie Rathburn		12-21-01
William West		8-10-01

C.T. Specialties Training Record

Course Description:

Annual RCRA Refresher
Training &
Emergency Action Plan

Instructor: Tom Kuntz

<u>A-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Shawn Hudson		7-27-00
Anthony Massey		7-27-00
Christian Pigott		7/27/00
<u>B-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
John Brown		8/10/00
Charles Holden		8/10/00
Lathan Webb		12-22-00
<u>C-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Bill Brampton		8/10/00
Bobby Smith		7/27/00
Archie Stone		7-27/00

Donna Murray

Donna C. Murray

12/22/06

C.T. Specialties Training Record

Course Description:

Annual RCRA Refresher
Training &
Emergency Action Plan

Instructor: Tom KUNTZ

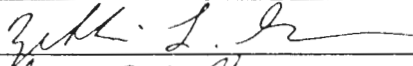

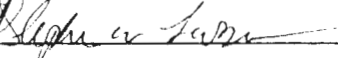
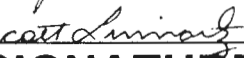
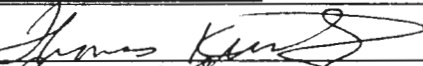
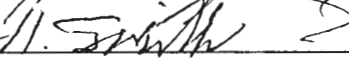
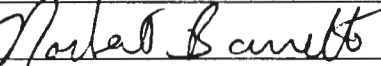
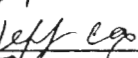



<u>D-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Zeke Green	Zeke L. Green	7/27/00
James Bryant	STD	
Steve LaBarge	FLEX Stephen W. LaBarge	7-27-00
Scott Linnartz	Scott Linnartz	7-27-00
<u>Operations</u>	<u>SIGNATURE</u>	<u>DATE</u>
Bill Coyle	Bill Coyle Instructor	12/23/00
Mike Hogan	Mike Hogan	7/27/00
Tom Kuntz	Thomas Kuntz Instructor	7/27/00
Al Smith	Al Smith	7-27-00
<u>Maintenance</u>	<u>SIGNATURE</u>	<u>DATE</u>
Norbert Barrette	Norbert Barrette	12/15/00
Jeff Cox	Jeff Cox	8/10/00
Joseph Lee	Joseph Lee	7-27-00
Richard Ramsey	Terminated	
William West	William West III	7-27-00
JERRY MALPASS	Jerry B. Malpass	12-15-00
Rudy Arcova	Rudy Arcova	12-15-00
Brian Stevens	Brian Stevens	12-15-00
Reggie Rathburn	Reggie W. Rathburn	12/22/00

C.T. Specialties Training Record

Course Description:

Haz Waste Refresher
& Emergency Response

Instructor: Tom KUNTZ

<u>D-Shift</u>	<u>SIGNATURE</u>	<u>DATE</u>
Zeke Green		7/30/01
Jamie Ham		7/30/01
Steve LaBarge		7-30-01
Scott Linnartz		7-30-01
<u>Operations</u>	<u>SIGNATURE</u>	<u>DATE</u>
Tom Kuntz		
Al Smith		8-20-01
<u>Maintenance</u>	<u>SIGNATURE</u>	<u>DATE</u>
Norbert Barrette		7/27/01
Jeff Cox		12/21/01
Terry Malpass		12-13-01
Reggie Rathburn		12-21-01
William West		8-10-01



PRESSURE CHEMICAL CO.

Specialty Chemical Div

JOB DESCRIPTION/TRAINING RECORD FOR HAZARDOUS WASTE MANAGEMENT/DISPOSAL POSITIONS PER 40 CFR 265.16.

This record must be maintained at the facility.






FACILITY: Pressure Chemical Co. UNIT: Leland Facility
ADDRESS: 2271 Andrew Jackson Hwy., NE, Leland, NC 28451
PHONE: 910-371-2234 DATE: Oct 10, 2002
EMPLOYEE NAME: Jason Aull

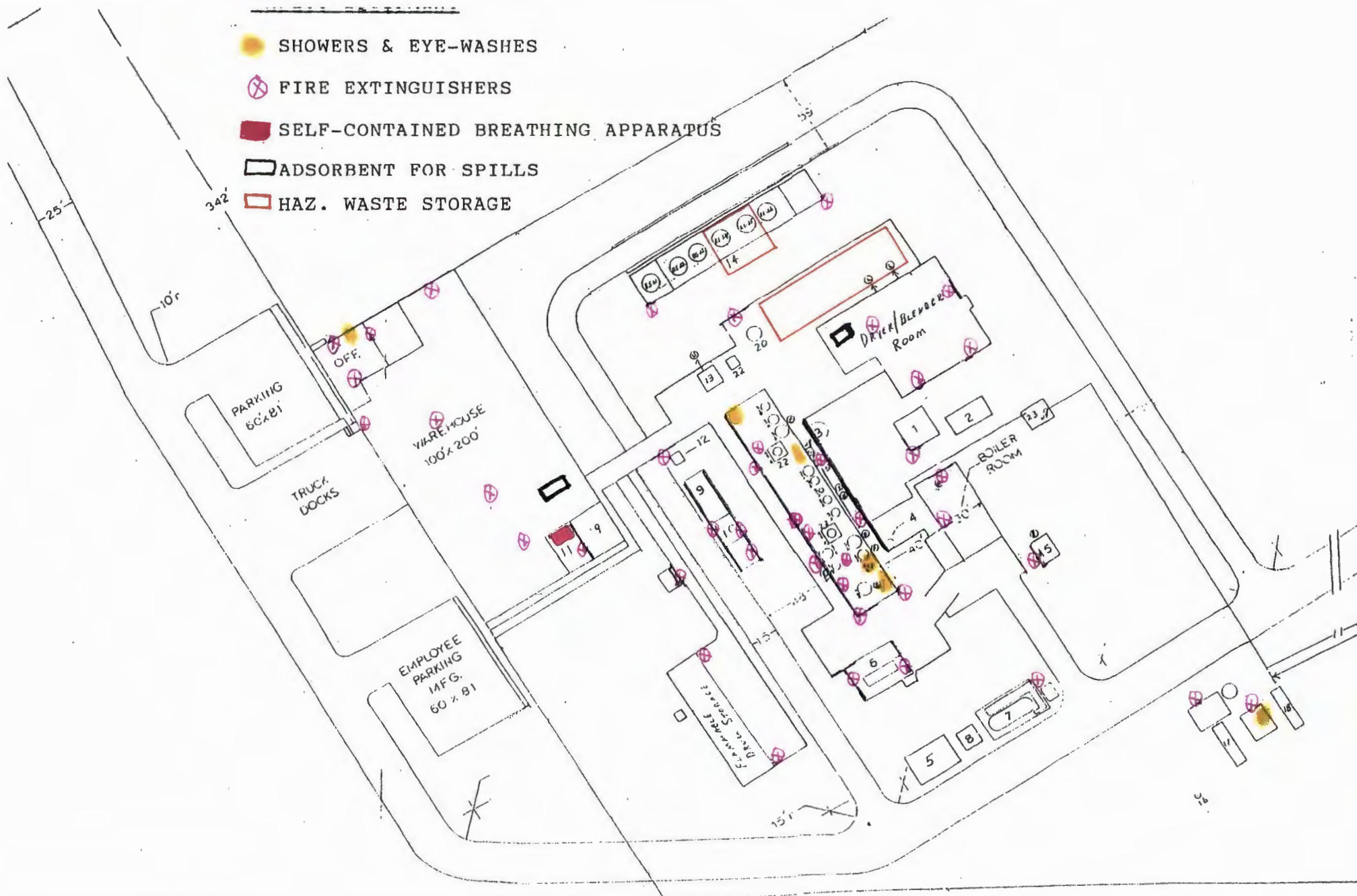
JOB TITLE: Production Supervisor

HAZARDOUS WASTE RELATED QUALIFICATIONS AND DUTIES (INCLUDE REQUISITE SKILLS, EDUCATION, OR OTHER QUALIFICATIONS).

The above person works with and handles hazardous materials and wastes at the work site located at: Pressure Chemical Co., Leland Facility, Leland, North Carolina. This person has the appropriate qualification to read, understand, apply, and communicate written and verbal information regarding handling and managing hazardous wastes. Training is required within six months of assuming duty and once a year thereafter. He/She is responsible for proper handling, documenting, inspecting, and transporting hazardous wastes. He/Se is also responsible for responding to emergencies. The above individual commenced these duties on August 7, 2001 ,

DATE	DESCRIPTION OF TRAINING(FOR FORMAL TRAINING) FOR INFORMAL TRAINING: ENTER "ON THE JOB TRAINING" ENTER THE TITLE, A BRIEF DESCRIPTION AND THE NAME OF THE INSTRUCTORS.	EMPLOYEE SIGNATURE
10/10/02	ANNUAL RCRA TRAINING - CLASSROOM INSTRUCTOR - Tim Williams - S&E MANAGER	Jason Aull
10/10/02	SATELLITE ACCUMULATION POINT - CLASSROOM INSTRUCTOR - Tim Williams - S&E MANAGER	Jason Aull

-  SHOWERS & EYE-WASHES
-  FIRE EXTINGUISHERS
-  SELF-CONTAINED BREATHING APPARATUS
-  ADSORBENT FOR SPILLS
-  HAZ. WASTE STORAGE



PROPERTY LINE

AD
TOWER
ER COLUMN
ER COLUMN
ER STORAGE TUB

- 7. LIQUID PAD (HYDROGEN)
- 8. LIQUID NITROGEN PAD
- 9. MOTOR CONTROL CENTER
- 10. MFG. OFFICE
- 11. EMPLOYEE LUNCH ROOM

- 13. DRYER PAD
- 14. 10000 BULK STORAGE TANKS
- 15. 10000 FUEL OIL STORAGE
- 16. WELL
- 17. 10000 WELL WATER STOR

- 19. LOCKER ROOM
- 20. 5000 GALLON ALCOHOL TANK
- 21. 5000 LIQUID PROPANE STORAGE
- 22. CENTRIFUGES
- 23. WASTE TANK

EMISSION POINT ID NO.'S

- A - B-01
- B - B-02
- C - OH-01
- D - HH2A
- E - C-HT29
- F - HR1
- G - C-HT3
- H - OR6
- I - C-OR6
- J - C-ER9
- K - C-HT11/12

North Carolina
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



April 30, 2003

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Larry Rosen, CEO
Pressure Chemical Co.
3419 Smallman Street
Pittsburgh, PA 152011-997

RE: Compliance Order with Administrative Penalty
Pressure Chemical Company - Specialty Chemical Division
NCD 091 572 073
Docket # 2003-038

Dear Mr. Rosen:

Enclosed is a Compliance Order with Administrative Penalty (Compliance Order) issued to Pressure Chemical Co. for certain violations of the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (Rules). The Compliance Order describes both the violations at your facility in Leland, North Carolina, and the actions required for compliance with the Act and Rules.

Pursuant to N.C.G.S. 130A-22(a), an administrative penalty of \$47,500.00 is imposed in the Compliance Order. Pressure Chemical Co. may appeal this Compliance Order by filing a written petition for a contested case hearing with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714, within 30 days of your receipt of the Compliance Order. A copy of the petition for a contested case hearing must also be served on Daniel C. Oakley, Process Agent for the Department of Environment and Natural Resources, 1601 Mail Service Center, Raleigh, North Carolina 27699-1601. The petition must be filed in accordance with N.C.G.S. 150B-23(a). See the section entitled "Notice of Appeal Rights" in the attached Compliance Order.

Please be advised that the Department of Environment and Natural Resources has implemented a department-wide policy to release all penalties assessed against facilities to the media. Therefore, the name of your facility and the penalty amount that has been assessed against you may be released to the media.

If no administrative hearing is requested, the administrative penalty must be paid by Pressure Chemical Co. within 60 days of receipt of the Compliance Order by certified check or money order, payable to the Division of Waste Management, and mailed to:

Ms. Jill B. Pafford, Chief
Hazardous Waste Section
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, N C 27605

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-733-4996 \ FAX: 919-715-3605 \ Internet: www.enr.state.nc.us

If you desire to schedule an informal conference to discuss the Compliance Order, please contact Lebeed Kady at (919) 733-2178 extension 217.

Respectfully,



Dexter R. Matthews, Director
Division of Waste Management

Enclosure: Compliance Order with Administrative Penalty and Penalty Sheets

cc: Tim Williams, Project Coordinator
Pressure Chemical Co.
2271 Andrew Jackson HWY NE
Leland, NC 28451

(Via certified Mail/
return receipt requested)

Lebeed Kady
Bud McCarty
Bobby Nelms
Jenny Rankin
Mike Williford
Doug Holyfield
Kathleen Waylett, Attorney General's Office
New Hanover County Health Director
John Crowder, Wilmington Regional Office Manager
Kris Lippert, EPA Region 4
Central Files

rc: Phyllystine Spinks
Doug Roberts
Helen Cotton

**North Carolina Department of Environment
and Natural Resources
Division of Waste Management
Hazardous Waste Section**

In Re: **Pressure Chemical Co.
NCD 091 572 073**

**COMPLIANCE ORDER WITH
ADMINISTRATIVE PENALTY
Docket # 2003-038**

PRELIMINARY STATEMENT

This Compliance Order with Administrative Penalty ("Compliance Order") is issued by the North Carolina Department of Environment and Natural Resources, Division of Waste Management under the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (the "Act"), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (the "Rules"). Based upon an inspection at a site operated by Pressure Chemical Co., the Division of Waste Management has determined that Pressure Chemical Co. is in violation of certain requirements of the Act and Rules as set forth in this Compliance Order.

STATEMENT OF FACTS AND LAW

1. The North Carolina Department of Environment and Natural Resources ("the Department") is required to enforce the Act and the Rules, which govern the management of hazardous waste. The Secretary of the Department has delegated this authority and responsibility to the Director of the Division of Waste Management ("the Division").
2. The United States Environmental Protection Agency has authorized North Carolina to operate the State Hazardous Waste Program in accordance with the Act and the Rules, in lieu of the federal RCRA program.
3. Pressure Chemical Co. is a corporation organized under the laws of Pennsylvania. Pressure Chemical Co. is a person as defined in N.C.G.S. § 130A-290(a)(22).
4. Pressure Chemical Co. manufactures specialty chemicals and provides custom manufacturing of chemicals to others. Pressure Chemical Co. operates a manufacturing facility located on Highway 74 west at 2271 Andrew Jackson HWY NE, Leland, New Hanover County, North Carolina "the facility."
5. The facility was previously operated by CT Specialties Corp., a company affiliated with Pressure Chemical Co. In January 2002, Pressure Chemical Co. consolidated CT Specialties Corp. into Pressure Chemical Co.
6. Pressure Chemical Co. generates hazardous waste as defined in N.C.G.S. §130A-290(a)(8) and 15A NCAC 13A .0106. The hazardous wastes generated by Pressure

Chemical Co. are identified by EPA Hazardous Waste numbers D001, D002, D007, D038, F002, F003, F005 and U041.

7. Pressure Chemical Co. is listed with the Division as a large quantity generator of hazardous waste. A "large quantity generator" is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month. Pressure Chemical Co. is required to comply with all Rules applicable to large quantity generators of hazardous waste.
8. On October 30, 2002, Bobby Nelms and Jenny Rankin, Waste Management Specialists, with the Division, conducted an inspection at Pressure Chemical Co. facility for compliance with the Rules. The inspectors observed violations of the Rules at several locations around the facility.

Pressure Chemical Co. maintains satellite accumulation areas: near the lab, the waste water treatment plant (WWTP), the blender room, the HR-28 vacuum pump, the vacuum pump # 2, and at the DCH filter pad container near vacuum pump # 2. The facility maintains four <90-day storage areas: the area left of the blender room; the flammable storage area; an area to the right of the blender room; and an area near the HR-28 vacuum pump. The last two storage areas were not designated as hazardous waste storage areas by the facility, however, they were defined as such by the inspectors, since Pressure Chemical Co. was storing more than 55 gallons of waste in these areas.

9. As a result of the inspection conducted on October 30, 2002, the Division has determined that Pressure Chemical Co. violated the following Rules:

- a. 40 CFR 262.34(a)(1)(i):

- i. Pursuant to 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status (except as provided in paragraphs (d), (e) and (f) of 40 CFR 262.34) when the waste is placed in containers if the generator complies with Subparts I, AA, BB and CC of 40 CFR Part 265.

- (1) Pursuant to 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0010, a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- (2) Pursuant to 40 CFR 265.174, adopted by reference at 15A NCAC 13A .0110 the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(1)(i) in that during the inspection, the inspectors observed three (3) open totes of hazardous waste in the hazardous waste storage area left of the blender room. The facility failed to perform weekly inspections of the hazardous waste storage

**Division of Waste Management
Hazardous Waste Section
Penalty Summary Worksheet**

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038
Regulation(s) Violated: 40 CFR 262.34(a)(4) referenced by 40 CFR 265.16(c)

Site Information:

Hazardous waste codes: D001, D002, D007, D038, F002, F003, F005 and U041
Toxicity of waste involved:
Distance to residences: > 1 mile
Number of people involved: 26 employees
Is the regulatory program adversely affected? Yes

15A NCAC 13B .0702 - Civil Penalty Standards:

Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

- (i) **Type of violation:** The production manager did not receive an annual review of the initial training required by 265.16(a) within the time required by 265.16(c). (Refer to 9.c. of the Compliance Order)
- (ii) **Type of waste involved:** All wastes generated by the facility.
- (iii) **Duration and gravity of the violation:** Employee missed his annual training by two months. Deviation from the requirements was major. The nature and degree of harm was minor.
- (iv) **Cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **Potential effect on public health and the environment:** Yes
media for exposure: direct contact, air and land
human health effect: eye, skin, liver, kidneys, and Respiratory System.
environment effect including other organisms: air and land
- (vi) **Effectiveness of responsive measures taken by the violator:**
Annual review of the initial training was provided, although not within the time required by the rule.
- (vii) **Damage to private property:** N/A

(2) Cost of rectifying any damage: N/A

(3) Previous record: The facility was issued a Notice of Violation, Docket # 98-246 for personnel not taking part in an annual review of an initial training as per an inspection dated August 24, 1998.

Pressure Chemical Co.
NCD 091 572 073
Docket # 2003-038

Penalty Summary Worksheet

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20k-25k	\$15k-20k	\$11k-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500


Value from Assessment Matrix = \$2,250.00

+
 Multi-Day/Event
 # of days/events x penalty = \$

+
 Compliance History
 + 10% per repeat violation = \$ 250.00

Any other notations:

Total penalty assessed = \$2,500.00



Signature

4-30-03

Date

**Division of Waste Management
Hazardous Waste Section
Penalty Summary Worksheet**

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038
Regulation(s) Violated: 40 CFR 262.34(a)(3); and 40 CFR 262.34(a)(4) referenced by 40 CFR 265.31, 40 CFR 265.35, and 40 CFR 265.52(c)

Site Information:

Hazardous waste codes: D001, D002, F002, F003 and F005
Toxicity of waste involved: ignitable wastes, heavy metals and solvent wastes
Distance to residences: > 1 mile
Number of people involved: 26 employees
Is the regulatory program adversely affected? Yes

15A NCAC 13B .0702 - Civil Penalty Standards:

Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

- (i) **Type of violation:** The facility had not labeled or marked 24 totes with the words "Hazardous Waste". It did not minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste. The facility did not maintain adequate aisle space for emergency response and inspections between the containers. The facility failed to describe in its contingency plan arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency services. (Refer to 9.b. and 9. d. of the Compliance Order)
- (ii) **Type of waste involved:** All type of waste related material containing ignitables and toxicants
- (iii) **Duration and gravity of the violation:** Upon information and belief the violation existed for a long time. Deviation from the requirements was major. The nature and degree of harm was major.
- (iv) **Cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **Potential effect on public health and the environment:** Yes
media for exposure: direct contact, air and land
human health effect: eye, skin, liver, kidneys, and Respiratory System.
environment effect including other organisms: air and land
- (vi) **Effectiveness of responsive measures taken by the violator:** The facility sent to the Hazardous Waste Section a letter dated November 6, 2002 stating that all the deficiencies were corrected.

Pressure Chemical Co.
NCD 091 572 073
Docket # 2003-038

- (vii) Damage to private property: N/A
- (2) Cost of rectifying any damage: N/A
- (3) Previous record: None

Penalty Summary Worksheet

Facility Name: Pressure Chemical Co.
 EPA Id. Number: NCD 091 572 073
 Docket #: 2003-038

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20k-25k	\$15k-20k	\$11k-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$22,500.00


+
 Multi-Day/Event
 # of days/events x penalty = \$

+
 Compliance History
 + 10% per repeat violation = \$

Any other notations:

Total penalty assessed = \$22,500.00


 Signature


 Date

to air, soil, or surface water which could threaten human health or the environment.

- ii. 40 CFR 265.34(a), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must ensure that whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.
- iii. 40 CFR 265.35, adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.
- iv. 40 CFR 265.52(c), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must describe in its contingency plan arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.
- e. Comply with 40 CFR 262.34(c)(1)(i), adopted by reference at 15A NCAC 13A .0107 referencing:
 - i. 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must always close containers holding hazardous waste, except when it is necessary to add or remove waste.
 - ii. 15A NCAC 13A .0107(d), Pressure Chemical must document and keep records and the results of the required inspections for at least three years from the date of the inspection.

POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Pressure Chemical Co. is hereby advised that, pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules constitutes a separate violation for which an additional penalty of up to \$25,000.00 per day may be imposed. If the violation continues, Pressure Chemical Co. may also be subject to further enforcement, including an action for injunctive relief, to prohibit any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the Act and Rules.

NOTICE OF RIGHT TO APPEAL

Pressure Chemical Co. has the right to an appeal to contest any matter of law, material fact, requirement, or the penalty set forth in this Compliance Order. To appeal this Compliance Order, Pressure Chemical Co. must file a written petition for a contested case hearing with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714, within 30 days of receipt of the Compliance Order. The petition must be received and filed by the Office of Administrative Hearings within the 30-day period. The telephone number is (919) 733-2691. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to:

Daniel C. Oakley
Process Agent for the Department of Environment and Natural Resources
1601 Mail Service Center
Raleigh, NC 27699-1601

The petition for a contested case hearing must be in accordance with N.C.G.S. 150B-23(a), and must state facts tending to establish that the Division has deprived Pressure Chemical Co. of property, has ordered Pressure Chemical Co. to pay a fine or civil penalty, or has otherwise substantially prejudiced Pressure Chemical Co.'s rights, and that the Division:

- a. Exceeded its authority or jurisdiction;
- b. Acted erroneously;
- c. Failed to use proper procedure;
- d. Acted arbitrarily or capriciously; or
- e. Failed to act as required by law or rule.

The petition must be signed by Pressure Chemical Co. or its representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings.

If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

The scheduling of an informal conference will not relieve Pressure Chemical Co. of the need to file a written petition for a contested case hearing with the Office of Administrative Hearings within 30 days Pressure Chemical Co.'s receipt of this Compliance Order, if an appeal is desired.

This the 30 day of April, 2003



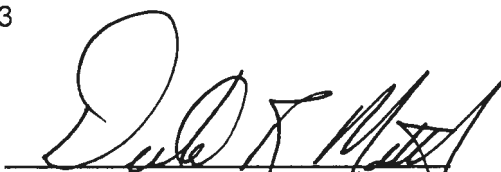
Dexter R. Matthews, Director
Division of Waste Management

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, return receipt requested, and postage prepaid) in an envelope addressed to:

Larry Rosen, CEO
Pressure Chemical Co.
3419 Smallman Street
Pittsburgh, PA 152011-997

Dated this 30 day of April, 2003



Dexter R. Matthews, Director
Division of Waste Management

**Division of Waste Management
Hazardous Waste Section
Penalty Summary Worksheet**

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038
Regulation(s) Violated: 40 CFR 262.34(a)(1)(i) referenced by 40 CFR.265.173(a), 40 CFR 265.174; and 40 CFR 262.34(c)(1)(i) referenced by 40 CFR 265.173(a), and 15A NCAC 13A .0107(d)

Site Information:

Hazardous waste codes: D001, D002, F002, F003, and F005
Toxicity of waste involved: ignitable wastes, heavy metals and solvent wastes
Distance to residences: > 1 mile
Number of people involved: 26 employees
Is the regulatory program adversely affected? Yes

15A NCAC 13B .0702 - Civil Penalty Standards:

- Consider:** (1) **Nature of the violation and degree and extent of harm, including at least the following:**
- (i) **Type of violation:** The facility failed to close its containers and failed to inspect and/or failed to document its inspections in both generator storage area and satellite accumulation area. (Refer to 9.a. and 9.e. in the Compliance Order)
 - (ii) **Type of waste involved:** scrubber cleanout solution, and other wastes noted above
 - (iii) **Duration and gravity of the violation:** Upon information and belief the violation existed for a long time. Deviation from the requirements was major. The nature and degree of harm was major.
 - (iv) **Cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
 - (v) **Potential effect on public health and the environment:** Yes
media for exposure: air, ground water and land
human health effect: eye, skin, liver, kidneys, and Respiratory System.
environment effect including other organisms: air and land
 - (vi) **Effectiveness of responsive measures taken by the violator:** The facility sent the Hazardous Waste Section a letter dated November 6, 2002 that stated all the deficiencies were corrected.
 - (vii) **Damage to private property:** N/A
- (2) **Cost of rectifying any damage:** N/A
(3) **Previous record:** None

Penalty Summary Worksheet

Pressure Chemical Co.
NCD 091 572 073
Docket # 2003-038

Facility Name: Pressure Chemical Co.
 EPA Id. Number: NCD 091 572 073
 Docket #: 2003-038

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20k-25k	\$15k-20k	\$11k-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

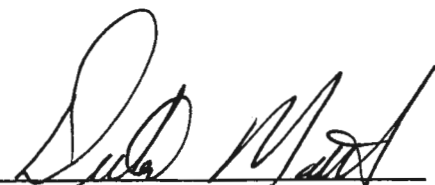
Value from Assessment Matrix = \$22,500.00

+
 Multi-Day/Event
 # of days/events x penalty = \$

+
 Compliance History
 + 10% per repeat violation = \$

Any other notations:

Total penalty assessed = \$22,500.00



 Signature

4-30-03

 Date

area left of the blender room, the area near HR-28 pump, and the flammable storage building.

b. 40 CFR 262.34(a)(3):

- i. Pursuant to CFR 262.34(a)(3), adopted by reference at 15A NCAC 13A .0107, each container and tank holding hazardous waste must be labeled or marked clearly with the words, "Hazardous Waste".
- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(3), in that during the inspection it was noted that the facility had not labeled or marked 24 totes containing hazardous waste with the words "Hazardous Waste". Eighteen tote containers were located on both sides of the blender room containing DCH which is a D002 hazardous waste. There were six tote containers containing hazardous waste that had not been marked or labeled with the words "Hazardous Waste" near the HR-28 vacuum pump area.

c. 40 CFR 262.34(a)(4):

- i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR part 265, with Section 265.16, and with 40 CFR 268.7(a)(5).

Pursuant to 40 CFR 265.16(c), adopted by reference at 15A NCAC 13A .0110, facility personnel must take part in an annual review of the initial training required by Section 265.16(a).

- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(4) in that it failed to comply with the requirements of Section 265.16. During the inspection it was noted that the facility failed to provide an annual (365 days) review of the initial training required by 40 CFR 265.16(a). Mr. Jason Aull, Production Manager had not received an annual review of his initial training within the time required under Section 265.16. Mr. Aull's last annual training was on October 10, 2002; training records indicated his previous training was on August 10, 2001.

d. 40 CFR 262.34(a)(4):

- i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR part 265, with Section 265.16, and with 40 CFR 268.7(a)(5).

- (1) Pursuant to 40 CFR 265.31, adopted by reference at 15A NCAC 13A .0110, facilities must be maintained and operated to minimize the

possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

- (2) Pursuant to 40 CFR 265.35, adopted by reference at 15A NCAC 13A .0110, the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.
- (3) Pursuant to 40 CFR 265.52(c), adopted by reference at 15A NCAC 13A .0110, the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.

- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(4) in that during the inspection hazardous waste was observed leaking from two of the open tote containers which contained DCH solution with D002 waste code. These containers were located in the hazardous waste storage area to the left of the blender room.

The facility failed to maintain adequate aisle space for emergency response and for inspections in the storage areas to the right of the blender room and near the HR-28 vacuum pump.

The facility failed to describe in its contingency plan arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency services, pursuant to Section 265.37.

- e. 40 CFR 262.34(c)(1)(i):

- i. Pursuant to 40 CFR 262.34(c)(1)(i), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in Section 261.33(e) in containers at or near any 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 interim status and without complying with paragraph (a) of this section provided he complies with 40 CFR 265.171, 265.172, and 265.173(a).

- (1) Pursuant to 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0010, a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
- (2) Pursuant to 15A NCAC 13A .0107(d) requires that a generator to

keep records of inspections and results of inspections required by generator's accumulation time for at least three years from the date of inspection.

- ii. Pressure Chemical Co. violated 40 CFR 262.34(c)(1)(i) in that during the inspection, it was noted that the facility had failed to put a band around the cover of three 55-gallon containers of hazardous waste, one in the WWTP area, one in the blender room labeled phenyl-tri-methyl-ammonium chloride (PTAC) with a D001 hazardous waste code, one across from the vacuum pump # 2 labeled diaminocyclohexane (DCH) with a D002 waste code. The band keeps the cover secure in case a container tips or falls. All three containers were identified as containing hazardous waste during the inspection by Mr. Tim Williams, the facility contact during the inspection. Two 55-gallon containers containing hazardous waste were open with a funnel on top of them. One of the containers was located in the HR-28 vacuum pump area and the other container was located in the vacuum pump #2 area. Both containers containing waste vacuum pump oil with a multi waste code D001, F003 and F005. Alternatively, the facility failed to document inspections conducted in these areas as required by 15A NCAC 13A .0107(d).

ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$25,000.00 per day for each violation of the hazardous waste provisions of the Act, Rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty which include the degree and extent of the harm caused by the violation and the cost of rectifying the damage.

15A NCAC 13B .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After careful consideration of each factor above, penalties are assessed for the violations set out in this Compliance Order, as follows: for the violations set forth in paragraph 9.a. and 9.e. \$22,500.00; for the violations set forth in paragraph 9.c. \$2,500.00; and for the violations set forth in paragraph 9.b. and 9.d. \$22,500.00. Accordingly, a total penalty is imposed in the amount of \$47,500.00.

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Pressure Chemical Co. is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, payable to the Division of Waste Management. The payment should be mailed to:

Ms. Jill B. Pafford, Chief
Hazardous Waste Section
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, NC 27605

2. Pressure Chemical Co. shall immediately, unless otherwise indicated, take the following actions to correct all violations as stated in this Compliance Order:
 - a. Comply with 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107 referencing:
 - i. 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must always close containers holding hazardous waste, except when it is necessary to add or remove waste.
 - ii. 40 CFR 265.174, adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.
 - b. Comply with 40 CFR 262.34(a)(3), adopted by reference at 15A NCAC 13A .0107. Pressure Chemical Co. shall label or clearly mark each container of hazardous waste with the words, "Hazardous Waste" or with other words to identify its contents.
 - c. Comply with 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107 referencing:

40 CFR 265.16(c), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must ensure facility personnel receive an annual review of the initial training required by 40 CFR 265.16(a). This review must be provided at least every 365 days.
 - d. Comply with 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107 referencing:
 - i. 40 CFR 265.31, adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents



North Carolina
Department of Environment and Natural Resources

Division of Waste Management

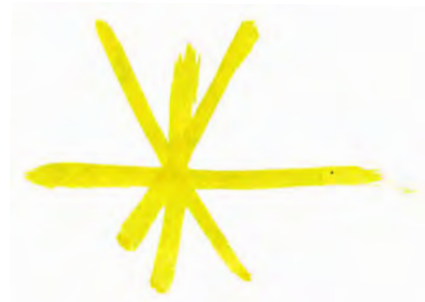
Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director

April 30, 2003



**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Larry Rosen, CEO
Pressure Chemical Co.
3419 Smallman Street
Pittsburgh, PA 152011-997



RE: Compliance Order with Administrative Penalty
Pressure Chemical Company - Specialty Chemical Division
NCD 091 572 073
Docket # 2003-038

Dear Mr. Rosen:

Enclosed is a Compliance Order with Administrative Penalty (Compliance Order) issued to Pressure Chemical Co. for certain violations of the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (Rules). The Compliance Order describes both the violations at your facility in Leland, North Carolina, and the actions required for compliance with the Act and Rules.

Pursuant to N.C.G.S. 130A-22(a), an administrative penalty of \$47,500.00 is imposed in the Compliance Order. Pressure Chemical Co. may appeal this Compliance Order by filing a written petition for a contested case hearing with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714, within 30 days of your receipt of the Compliance Order. A copy of the petition for a contested case hearing must also be served on Daniel C. Oakley, Process Agent for the Department of Environment and Natural Resources, 1601 Mail Service Center, Raleigh, North Carolina 27699-1601. The petition must be filed in accordance with N.C.G.S. 150B-23(a). See the section entitled "Notice of Appeal Rights" in the attached Compliance Order.

Please be advised that the Department of Environment and Natural Resources has implemented a department-wide policy to release all penalties assessed against facilities to the media. Therefore, the name of your facility and the penalty amount that has been assessed against you may be released to the media.


If no administrative hearing is requested, the administrative penalty must be paid by Pressure Chemical Co. within 60 days of receipt of the Compliance Order by certified check or money order, payable to the Division of Waste Management, and mailed to:

Ms. Jill B. Pafford, Chief
Hazardous Waste Section
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, N C 27605

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-733-4996 \ FAX: 919-715-3605 \ Internet: www.enr.state.nc.us

If you desire to schedule an informal conference to discuss the Compliance Order, please contact Lebeed Kady at (919) 733-2178 extension 217.

Respectfully,



Dexter R. Matthews, Director
Division of Waste Management

Enclosure: Compliance Order with Administrative Penalty and Penalty Sheets

cc: Tim Williams, Project Coordinator
Pressure Chemical Co. (Via certified Mail/
2271 Andrew Jackson HWY NE return receipt requested)
Leland, NC 28451

Lebeed Kady
Bud McCarty
Bobby Nelms
Jenny Rankin
Mike Williford
Doug Holyfield
Kathleen Waylett, Attorney General's Office
New Hanover County Health Director
John Crowder, Wilmington Regional Office Manager
Kris Lippert, EPA Region 4
Central Files

rc: Phyllystine Spinks
Doug Roberts
Helen Cotton

**North Carolina Department of Environment
and Natural Resources
Division of Waste Management
Hazardous Waste Section**



In Re: **Pressure Chemical Co.
NCD 091 572 073**

**COMPLIANCE ORDER WITH
ADMINISTRATIVE PENALTY
Docket # 2003-038**

PRELIMINARY STATEMENT

This Compliance Order with Administrative Penalty ("Compliance Order") is issued by the North Carolina Department of Environment and Natural Resources, Division of Waste Management under the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (the "Act"), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (the "Rules"). Based upon an inspection at a site operated by Pressure Chemical Co., the Division of Waste Management has determined that Pressure Chemical Co. is in violation of certain requirements of the Act and Rules as set forth in this Compliance Order.

STATEMENT OF FACTS AND LAW

1. The North Carolina Department of Environment and Natural Resources ("the Department") is required to enforce the Act and the Rules, which govern the management of hazardous waste. The Secretary of the Department has delegated this authority and responsibility to the Director of the Division of Waste Management ("the Division").
2. The United States Environmental Protection Agency has authorized North Carolina to operate the State Hazardous Waste Program in accordance with the Act and the Rules, in lieu of the federal RCRA program.
3. Pressure Chemical Co. is a corporation organized under the laws of Pennsylvania. Pressure Chemical Co. is a person as defined in N.C.G.S. § 130A-290(a)(22).
4. Pressure Chemical Co. manufactures specialty chemicals and provides custom manufacturing of chemicals to others. Pressure Chemical Co. operates a manufacturing facility located on Highway 74 west at 2271 Andrew Jackson HWY NE, Leland, New Hanover County, North Carolina "the facility."
5. The facility was previously operated by CT Specialties Corp., a company affiliated with Pressure Chemical Co. In January 2002, Pressure Chemical Co. consolidated CT Specialties Corp. into Pressure Chemical Co.
6. Pressure Chemical Co. generates hazardous waste as defined in N.C.G.S. §130A-290(a)(8) and 15A NCAC 13A .0106. The hazardous wastes generated by Pressure

Chemical Co. are identified by EPA Hazardous Waste numbers D001, D002, D007, D038, F002, F003, F005 and U041.

7. Pressure Chemical Co. is listed with the Division as a large quantity generator of hazardous waste. A "large quantity generator" is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month. Pressure Chemical Co. is required to comply with all Rules applicable to large quantity generators of hazardous waste.
8. On October 30, 2002, Bobby Nelms and Jenny Rankin, Waste Management Specialists, with the Division, conducted an inspection at Pressure Chemical Co. facility for compliance with the Rules. The inspectors observed violations of the Rules at several locations around the facility.

Pressure Chemical Co. maintains satellite accumulation areas: near the lab, the waste water treatment plant (WWTP), the blender room, the HR-28 vacuum pump, the vacuum pump # 2, and at the DCH filter pad container near vacuum pump # 2. The facility maintains four <90-day storage areas: the area left of the blender room; the flammable storage area; an area to the right of the blender room; and an area near the HR-28 vacuum pump. The last two storage areas were not designated as hazardous waste storage areas by the facility, however, they were defined as such by the inspectors, since Pressure Chemical Co. was storing more than 55 gallons of waste in these areas.

9. As a result of the inspection conducted on October 30, 2002, the Division has determined that Pressure Chemical Co. violated the following Rules:

- a. 40 CFR 262.34(a)(1)(i):

- i. Pursuant to 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status (except as provided in paragraphs (d), (e) and (f) of 40 CFR 262.34) when the waste is placed in containers if the generator complies with Subparts I, AA, BB and CC of 40 CFR Part 265.

- (1) Pursuant to 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0010, a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- (2) Pursuant to 40 CFR 265.174, adopted by reference at 15A NCAC 13A .0110 the owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(1)(i) in that during the inspection, the inspectors observed three (3) open totes of hazardous waste in the hazardous waste storage area left of the blender room. The facility failed to perform weekly inspections of the hazardous waste storage

area left of the blender room, the area near HR-28 pump, and the flammable storage building.

b. 40 CFR 262.34(a)(3):

- i. Pursuant to CFR 262.34(a)(3), adopted by reference at 15A NCAC 13A .0107, each container and tank holding hazardous waste must be labeled or marked clearly with the words, "Hazardous Waste".
- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(3), in that during the inspection it was noted that the facility had not labeled or marked 24 totes containing hazardous waste with the words "Hazardous Waste". Eighteen tote containers were located on both sides of the blender room containing DCH which is a D002 hazardous waste. There were six tote containers containing hazardous waste that had not been marked or labeled with the words "Hazardous Waste" near the HR-28 vacuum pump area.

c. 40 CFR 262.34(a)(4):

- i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR part 265, with Section 265.16, and with 40 CFR 268.7(a)(5).

Pursuant to 40 CFR 265.16(c), adopted by reference at 15A NCAC 13A .0110, facility personnel must take part in an annual review of the initial training required by Section 265.16(a).

- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(4) in that it failed to comply with the requirements of Section 265.16. During the inspection it was noted that the facility failed to provide an annual (365 days) review of the initial training required by 40 CFR 265.16(a). Mr. Jason Aull, Production Manager had not received an annual review of his initial training within the time required under Section 265.16. Mr. Aull's last annual training was on October 10, 2002; training records indicated his previous training was on August 10, 2001.

d. 40 CFR 262.34(a)(4):

- i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR part 265, with Section 265.16, and with 40 CFR 268.7(a)(5).

- (1) Pursuant to 40 CFR 265.31, adopted by reference at 15A NCAC 13A .0110, facilities must be maintained and operated to minimize the

possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

- (2) Pursuant to 40 CFR 265.35, adopted by reference at 15A NCAC 13A .0110, the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.
- (3) Pursuant to 40 CFR 265.52(c), adopted by reference at 15A NCAC 13A .0110, the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.

- ii. Pressure Chemical Co. violated 40 CFR 262.34(a)(4) in that **during the inspection hazardous waste was observed leaking from two of the open tote containers which contained DCH solution with D002 waste code.** These containers were located in the hazardous waste storage area to the left of the blender room.

The facility **failed to maintain adequate aisle space** for emergency response and for inspections in the storage areas to the right of the blender room and near the HR-28 vacuum pump.

The facility failed to **describe in its contingency plan arrangements agreed** to by local police departments, fire departments, hospitals, contractors, and State and local emergency services, pursuant to Section 265.37.

- e. 40 CFR 262.34(c)(1)(i):

- i. Pursuant to 40 CFR 262.34(c)(1)(i), adopted by reference at 15A NCAC 13A .0107, a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in Section 261.33(e) in containers at or near any 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 interim status and without complying with paragraph (a) of this section provided he complies with 40 CFR 265.171, 265.172, and 265.173(a).

- (1) Pursuant to 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0010, a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
- (2) Pursuant to 15A NCAC 13A .0107(d) requires that a generator to

keep records of inspections and results of inspections required by generator's accumulation time for at least three years from the date of inspection.

- ii. Pressure Chemical Co. violated 40 CFR 262.34(c)(1)(i) in that during the inspection, it was noted that the facility had failed to put a band around the cover of three 55-gallon containers of hazardous waste, one in the WWTP area, one in the blender room labeled phenyl-tri-methyl-ammonium chloride (PTAC) with a D001 hazardous waste code, one across from the vacuum pump # 2 labeled diaminocyclohexane (DCH) with a D002 waste code. The band keeps the cover secure in case a container tips or falls. All three containers were identified as containing hazardous waste during the inspection by Mr. Tim Williams, the facility contact during the inspection. Two 55-gallon containers containing hazardous waste were open with a funnel on top of them. One of the containers was located in the HR-28 vacuum pump area and the other container was located in the vacuum pump #2 area. Both containers containing waste vacuum pump oil with a multi waste code D001, F003 and F005. Alternatively, the facility failed to document inspections conducted in these areas as required by 15A NCAC 13A .0107(d).

ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$25,000.00 per day for each violation of the hazardous waste provisions of the Act, Rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty which include the degree and extent of the harm caused by the violation and the cost of rectifying the damage.

15A NCAC 13B .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After careful consideration of each factor above, penalties are assessed for the violations set out in this Compliance Order, as follows: for the violations set forth in paragraph 9.a. and 9.e. \$22,500.00; for the violations set forth in paragraph 9.c. \$2,500.00; and for the violations set forth in paragraph 9.b. and 9.d. \$22,500.00. Accordingly, a total penalty is imposed in the amount of \$47,500.00.

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Pressure Chemical Co. is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, payable to the Division of Waste Management. The payment should be mailed to:

Ms. Jill B. Pafford, Chief
Hazardous Waste Section
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, NC 27605

2. Pressure Chemical Co. shall immediately, unless otherwise indicated, take the following actions to correct all violations as stated in this Compliance Order:

- a. Comply with 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107 referencing:

- i. 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must always close containers holding hazardous waste, except when it is necessary to add or remove waste.

- ii. 40 CFR 265.174, adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

- b. Comply with 40 CFR 262.34(a)(3), adopted by reference at 15A NCAC 13A .0107. Pressure Chemical Co. shall label or clearly mark each container of hazardous waste with the words, "Hazardous Waste" or with other words to identify its contents.

- c. Comply with 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107 referencing:

40 CFR 265.16(c), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must ensure facility personnel receive an annual review of the initial training required by 40 CFR 265.16(a). This review must be provided at least every 365 days.

- d. Comply with 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107 referencing:

- i. 40 CFR 265.31, adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents

to air, soil, or surface water which could threaten human health or the environment.

- ii. 40 CFR 265.34(a), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must ensure that whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.
 - iii. 40 CFR 265.35, adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.
 - iv. 40 CFR 265.52(c), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must describe in its contingency plan arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.
- e. Comply with 40 CFR 262.34(c)(1)(i), adopted by reference at 15A NCAC 13A .0107 referencing:
- i. 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0110. Pressure Chemical Co. must always close containers holding hazardous waste, except when it is necessary to add or remove waste.
 - ii. 15A NCAC 13A .0107(d), Pressure Chemical must document and keep records and the results of the required inspections for at least three years from the date of the inspection.

POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Pressure Chemical Co. is hereby advised that, pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules constitutes a separate violation for which an additional penalty of up to \$25,000.00 per day may be imposed. If the violation continues, Pressure Chemical Co. may also be subject to further enforcement, including an action for injunctive relief, to prohibit any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the Act and Rules.

NOTICE OF RIGHT TO APPEAL

Pressure Chemical Co. has the right to an appeal to contest any matter of law, material fact, requirement, or the penalty set forth in this Compliance Order. To appeal this Compliance Order, Pressure Chemical Co. must file a written petition for a contested case hearing with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714, within 30 days of receipt of the Compliance Order. The petition must be received and filed by the Office of Administrative Hearings within the 30-day period. The telephone number is (919) 733-2691. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to:

Daniel C. Oakley
Process Agent for the Department of Environment and Natural Resources
1601 Mail Service Center
Raleigh, NC 27699-1601

The petition for a contested case hearing must be in accordance with N.C.G.S. 150B-23(a), and must state facts tending to establish that the Division has deprived Pressure Chemical Co. of property, has ordered Pressure Chemical Co. to pay a fine or civil penalty, or has otherwise substantially prejudiced Pressure Chemical Co.'s rights, and that the Division:

- a. Exceeded its authority or jurisdiction;
- b. Acted erroneously;
- c. Failed to use proper procedure;
- d. Acted arbitrarily or capriciously; or
- e. Failed to act as required by law or rule.

The petition must be signed by Pressure Chemical Co. or its representative and must be filed with a certificate of service stating that a copy of the petition was served on the Division through its process agent. The hearing will be conducted in accordance with Chapter 150B of the North Carolina General Statutes and the Rules of the Office of Administrative Hearings, a copy of which may be obtained from the Office of Administrative Hearings.

If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty.

**Division of Waste Management
Hazardous Waste Section
Penalty Summary Worksheet**

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038
Regulation(s) Violated: 40 CFR 262.34(a)(1)(i) referenced by 40 CFR 265.173(a), 40 CFR 265.174; and 40 CFR 262.34(c)(1)(i) referenced by 40 CFR 265.173(a), and 15A NCAC 13A .0107(d)

Site Information:

Hazardous waste codes: D001, D002, F002, F003, and F005
Toxicity of waste involved: ignitable wastes, heavy metals and solvent wastes
Distance to residences: > 1 mile
Number of people involved: 26 employees
Is the regulatory program adversely affected? Yes

15A NCAC 13B .0702 - Civil Penalty Standards:

- Consider:** (1) **Nature of the violation and degree and extent of harm, including at least the following:**
- (i) **Type of violation:** The facility failed to close its containers and failed to inspect and/or failed to document its inspections in both generator storage area and satellite accumulation area. (Refer to 9.a. and 9.e. in the Compliance Order)
 - (ii) **Type of waste involved:** scrubber cleanout solution, and other wastes noted above
 - (iii) **Duration and gravity of the violation:** Upon information and belief the violation existed for a long time. Deviation from the requirements was major. The nature and degree of harm was major.
 - (iv) **Cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
 - (v) **Potential effect on public health and the environment:** Yes
media for exposure: air, ground water and land
human health effect: eye, skin, liver, kidneys, and Respiratory System.
environment effect including other organisms: air and land
 - (vi) **Effectiveness of responsive measures taken by the violator:** The facility sent the Hazardous Waste Section a letter dated November 6, 2002 that stated all the deficiencies were corrected.
 - (vii) **Damage to private property:** N/A
- (2) **Cost of rectifying any damage:** N/A
(3) **Previous record:** None

Penalty Summary Worksheet

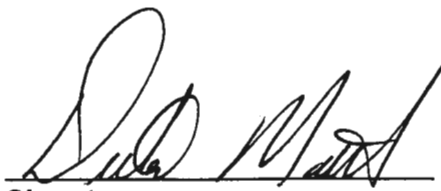
Pressure Chemical Co.
NCD 091 572 073
Docket # 2003-038

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20k-25k	\$15k-20k	\$11k-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$22,500.00
 +
 Multi-Day/Event
 # of days/events x penalty = \$
 +
 Compliance History
 + 10% per repeat violation = \$
 Any other notations:

Total penalty assessed = \$22,500.00


 Signature

4-30-03
 Date

**Division of Waste Management
Hazardous Waste Section
Penalty Summary Worksheet**

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038
Regulation(s) Violated: 40 CFR 262.34(a)(4) referenced by 40 CFR 265.16(c)

Site Information:

Hazardous waste codes: D001, D002, D007, D038, F002, F003, F005 and U041
Toxicity of waste involved:
Distance to residences: > 1 mile
Number of people involved: 26 employees
Is the regulatory program adversely affected? Yes

15A NCAC 13B .0702 - Civil Penalty Standards:

Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

(i) **Type of violation:** The production manager did not receive an annual review of the initial training required by 265.16(a) within the time required by 265.16(c). (Refer to 9.c. of the Compliance Order)

(ii) **Type of waste involved:** All wastes generated by the facility.

(iii) **Duration and gravity of the violation:** Employee missed his annual training by two months. Deviation from the requirements was major. The nature and degree of harm was minor.

(iv) **Cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent

(v) **Potential effect on public health and the environment:** Yes
media for exposure: direct contact, air and land
human health effect: eye, skin, liver, kidneys, and Respiratory System.
environment effect including other organisms: air and land

(vi) **Effectiveness of responsive measures taken by the violator:**
Annual review of the initial training was provided, although not within the time required by the rule.

(vii) **Damage to private property:** N/A

(2) **Cost of rectifying any damage:** N/A

(3) **Previous record:** The facility was issued a Notice of Violation, Docket # 98-246 for personnel not taking part in an annual review of an initial training as per an inspection dated August 24, 1998.

Pressure Chemical Co.
NCD 091 572 073
Docket # 2003-038

Penalty Summary Worksheet

Facility Name: Pressure Chemical Co.
 EPA Id. Number: NCD 091 572 073
 Docket #: 2003-038

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20k-25k	\$15k-20k	\$11k-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

Value from Assessment Matrix = \$2,250.00

+
 Multi-Day/Event
 # of days/events x penalty = \$

+
 Compliance History
 + 10% per repeat violation = \$ 250.00

Any other notations:

Total penalty assessed = \$2,500.00



 Signature

4-30-03

 Date

**Division of Waste Management
Hazardous Waste Section
Penalty Summary Worksheet**

Facility Name: Pressure Chemical Co.
EPA Id. Number: NCD 091 572 073
Docket #: 2003-038
Regulation(s) Violated: 40 CFR 262.34(a)(3); and 40 CFR 262.34(a)(4) referenced by 40 CFR 265.31, 40 CFR 265.35, and 40 CFR 265.52(c)

Site Information:

Hazardous waste codes: D001, D002, F002, F003 and F005
Toxicity of waste involved: ignitable wastes, heavy metals and solvent wastes
Distance to residences: > 1 mile
Number of people involved: 26 employees
Is the regulatory program adversely affected? Yes

15A NCAC 13B .0702 - Civil Penalty Standards:

Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

- (i) **Type of violation:** The facility had not labeled or marked 24 totes with the words "Hazardous Waste". It did not minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste. The facility did not maintain adequate aisle space for emergency response and inspections between the containers. The facility failed to describe in its contingency plan arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency services. (Refer to 9.b. and 9. d. of the Compliance Order)
- (ii) **Type of waste involved:** All type of waste related material containing ignitables and toxicants
- (iii) **Duration and gravity of the violation:** Upon information and belief the violation existed for a long time. Deviation from the requirements was major. The nature and degree of harm was major.
- (iv) **Cause: (whether resulting from a negligent, reckless or intentional act or omission):** Negligent
- (v) **Potential effect on public health and the environment:** Yes
media for exposure: direct contact, air and land
human health effect: eye, skin, liver, kidneys, and Respiratory System.
environment effect including other organisms: air and land
- (vi) **Effectiveness of responsive measures taken by the violator:** The facility sent to the Hazardous Waste Section a letter dated November 6, 2002 stating that all the deficiencies were corrected.

Pressure Chemical Co.
NCD 091 572 073
Docket # 2003-038

- (vii) Damage to private property: N/A
- (2) Cost of rectifying any damage: N/A
- (3) Previous record: None

Penalty Summary Worksheet

Facility Name: Pressure Chemical Co.
 EPA Id. Number: NCD 091 572 073
 Docket #: 2003-038

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$20k-25k	\$15k-20k	\$11k-15k
	MODERATE	\$8k-11k	\$5k-8k	\$3k-5k
	MINOR	\$1,500-3,000	\$500-1,500	\$250-500

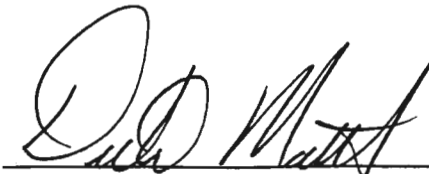
Value from Assessment Matrix = \$22,500.00


+
 Multi-Day/Event
 # of days/events x penalty = \$

+
 Compliance History
 + 10% per repeat violation = \$

Any other notations:

Total penalty assessed = \$22,500.00


 Signature


 Date

The scheduling of an informal conference will not relieve Pressure Chemical Co. of the need to file a written petition for a contested case hearing with the Office of Administrative Hearings within 30 days Pressure Chemical Co.'s receipt of this Compliance Order, if an appeal is desired.

This the 30 day of April, 2003



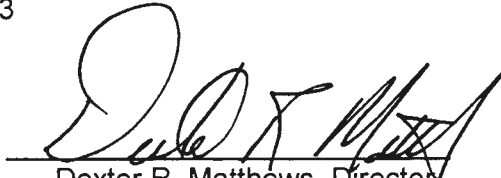
Dexter R. Matthews, Director
Division of Waste Management

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, return receipt requested, and postage prepaid) in an envelope addressed to:

Larry Rosen, CEO
Pressure Chemical Co.
3419 Smallman Street
Pittsburgh, PA 152011-997

Dated this 30 day of April, 2003



Dexter R. Matthews, Director
Division of Waste Management



PRESSURE CHEMICAL CO.

Specialty Chemical Division

P.O. Box 1956 2271 Andrew Jackson Hwy. NE
Leland, NC 28451-1956 Telephone 910-371-2234 Fax 910-371-9351

Fax Transmission Cover Sheet

TO: Bobby Nelms

DATE: 1/14/03

FROM: Randy Newman

FAX:

SUBJECT: Profile of WWTP Sludge

You should receive _____ page(s), including this cover sheet. If you do not receive all the pages, please call 910-371-2234.

Bobby -

I spoke w/ WTS and determined that the attached pages are the profiles and testing data for the WWTP sludge in question. If you have any questions, please let me know.

Regards,

Randy Newman

EQ Tracking # _____

WASTE CHARACTERIZATION REPORT

DP _____

TO EXPEDITE YOUR WASTE APPROVAL, PLEASE COMPLETE THIS FORM IN ITS ENTIRETY

Please Choose One EQ Management Facility

- Michigan Disposal Waste Treatment Plant (Stabilization and Treatment) 49350 N. 1-94 Service Drive Belleville, MI 481 11 EPA ID # MID 000 724 831
Phone: 800-592-5489 Fax: 800-592-5329
- Wayne Disposal, Inc. Site #2 Landfill (Hazardous & Chemical Waste Landfill) 49350 N. 1-94 Service Drive Belleville, MI 481 11 EPA ID # MID 048 090 633
Phone: 800-592-5489 Fax: 800-592-5329
- Michigan Recovery Systems, Inc. (Solvent Recycling, Fuel Blending, WW Treatment) 36345 Van Born Road Romulus, MI 48174 EPA ID # MID 060 975 844
Phone: 800-521-0998 Fax: 734-326-9375
- EQJIS - Transfer & Processing (Hazardous/Non-Hazardous Liquid Processing) 1010 Old Rawsonville Road Ypsilanti, MI 48197 EPA ID # MID 000 033 969
Phone: 734-547-1000 Fax: 734-480-9195

Section I - Generator & Customer Information

SIC # 2851
 Generator EPA ID # NCD 091 572 073
 Generator Pressure Chemical, Inc.
 Facility Address 2271 Andrew Jackson Hwy.
 City Leland State NC Zip 28451
 Mailing Address (if different) P.O. Box 1956
 City Leland State NC Zip 28451
 Generator Contact Tim Williams
 Title Engineer
 Phone (910)371-2234 Fax (910)371-9351

EQ Customer No. 583
 Involving Company Waste Technology Services, Inc.
 Address 640 Park Place
 City Niagara Falls State NY Zip 14301
 Country USA
 Involving Contact Judy Clinc
 Phone (716)282-4100 Fax (716)282-6986
 Technical Contact James Moulds
 Phone (804)649-0700 Fax (804)649-2360

Section 2 - Shipping and Packaging Information

2.1) Shipping volume: 50 - 100 drums
 Shipping frequency: One Time Only Annual
 2.2) DOT shipping name USDOT Non-Regulated Material

2.3) Packaging: (check all that apply)
 Bulk Solid (Yds < 2000 lbs/yds)
 Bulk Solid (Tonn > 2000 lbs/yds)
 Bulk Liquids (Gallons)
 Cubic Yard Boxes
 Drums
 Other (palletized, 5 gal. pails, etc.) _____

Section 3 - Physical Characteristics

WASTE COMMON NAME:

Sump and Containment Area Sludges, WIS# 19365

3.1) Color (describe): Varies (Grey to Black)
 3.2) Odor (describe): None
 3.3) Physical state at 70 F: (check all that apply)
 Solid Dust Liquid Sludge
 3.4) Does this waste contain?: (check all that apply)
 Free Liquids Metal fines Powders Oily residue
 Biodegradable sorbants NONE
 3.5) Does this waste contain?: (check all that apply) NONE
 Asbestos - friable Pyrophoric waste
 Asbestos - non-friable Reactive waste
 Dioxins Shock Sensitive waste
 Furans Radioactive waste
 Biohazard Explosives

3.6) Describe the composition of the waste (i.e. key chemical compounds, soil, water, ppe. debris, etc.):

<u>Dirt, sand, gravel</u>	<u>20</u> to <u>60</u> %
<u>Water</u>	<u>20</u> to <u>60</u> %
<u>Debris (PPP, nuts, bolts, plastic, rubber, wood)</u>	<u>1</u> to <u>10</u> %
<u>Oil/Grease</u>	<u>2</u> to <u>15</u> %
Total = 100 %	

3.7) Does this waste contain > 50% contaminated soil? Yes No
 3.8) Does this waste contain > 50% debris by volume? Yes No
 (debris is greater than 2.5 inches in size)

SEP 17 2002

9:25AM

WASTE TECHNOLOGIST BEN

Section 4 - Generating Process and Regulatory Information

NO. 414

WTS# 19365

4.1) Provide a detailed description of the process (es) generating this waste (attach flow diagram if available):

Clean-out of oil water separator and wastewater collection sumps and containment areas. No listed wastes present.

Source Code (e.g., A01): G13 Form Code (e.g., B101): W519 System Type Code (e.g., M041): H132 Handling Code (e.g., L, T, B, R): L

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules:

Waste Code(s)

- 4.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)?
4.3) Is this a MICHIGAN hazardous waste (Other than RCRA)?
4.4) Is this a MICHIGAN nonhazardous liquid industrial waste?
4.5) Is this a UNIVERSAL waste?
4.6) Does this waste exceed LDR treatment standards?
4.7) Is this an EPA RCRA characteristic hazardous waste (D001-DO43)?
4.8) What is the flash point of this waste?
4.9) Is the waste an oxidizer?
4.10) What is the pH of this waste?
4.11) Does this waste contain reactive cyanide >= 250 ppm?
4.12) Does this waste contain reactive sulfide >= 500 ppm?

029L
>200F
>12.5

Table with 3 columns: Code, Regulatory Level TCLP (mg/L), Concentration (if above). Rows include D004 Arsenic, D005 Barium, D008 Cadmium, D007 Chromium, D008 Lead, D009 Mercury, D010 Selenium, D011 Silver, D012 Endrin, D013 Lindane, D014 Methoxychlor, D015 Toxaphene, D016 2,4-D, D017 2,4,5-TP(Silvex), D018 Benzene, D019 Carbon Tetrachloride, D020 Chlordane, D021 Chlorobenzene, D022 Chloroform, D023 o-Cresol.

Table with 3 columns: Code, Regulatory Level TCLP (mg/L), Concentration (if above). Rows include D024 m-Cresol, D025 p-Cresol, D026 Cresols, D027 1,4-Dichlorobenzene, D028 1,2-Dichloroethane, D029 1,1-Dichloroethylene, D030 2,4-Dinitrotoluene, D031 Heptachlor, D032 Hexachlorobenzene, D033 Hexachlorobutadiene, D034 Hexachloroethane, D035 Methyl Ethyl Ketone, D036 Nitrobenzene, D037 Pentachlorophenol, D038 Pyridine, D039 Tetrachloroethylene, D040 Trichloroethylene, D041 2,4,5-Trichlorophenol, D042 2,4,6-Trichlorophenol, D043 Vinyl Chloride.

- 4.13) The hazardous constituent information is based on: Analysis (Please attach for review) Generator Knowledge Both
4.14) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents? Yes No N/A
If yes, indicate all hazardous constituents and their concentrations in the table provided in Section 5.

Section 5 - Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:

- 1) MVOC (MDWTP Volatile Organic Compounds) 2) CCVOC (Subpart CC Volatile Organic Compounds)
3) UHC (Underlying Hazardous Constituents) 4) TRI (Toxic Release Inventory Constituents)

Indicate all constituents in your waste stream, their concentrations and circle Yes or No for UHC:

Table with 2 columns: UHC?, Yes No. Multiple rows for data entry.

Table with 2 columns: UHC?, Yes No. Multiple rows for data entry.

SEP. 17. 2002 9:26AM WASTE TECHNOLOGY SER

NO. 414 P. 4/9
WTS# 19303

Section 6 - PCB & TSCA Information

- 6.1) What is the concentration of PCBs in the waste? None 0-5 ppm 6-49 ppm 50-499 ppm 500+ppm
- 6.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? Yes No
- 6.3) Does this waste contain free liquids? (use paint filter test) Yes No
- 6.4) Has this waste been processed into a non-liquid form?
If yes, what was the concentration of PCBs prior to processing? N/A 0-499 ppm 500- ppm
- 6.5) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? Yes No
- 6.6) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? Yes No
- 6.7) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? N/A Yes No

Section 7 - Benzene NESHA P Information

NESHAP SIC CODES
2812 2836 2875
2813 2841 2879
2816 2842 2891
2819 2843 2892
2821 2844 2893
2822 2851 2895
2823 2861 2899
2824 2865 2911
2833 2869 3312
2834 2873 4953
2835 2874 9511

- 7.1) Does the waste stream come from a facility with one of the SIC codes listed under the NESHA P? Yes No
- 7.2) Does your company manage wastes from facilities with Total Annual Benzene (TAB) ≥ 10 Mg/yr? Yes No
→ If you answered "NO" to question 7.1 AND 7.2 please skip to Section 8.
- 7.3) Does the waste contain >10 % water? Yes No
- 7.4) What is the TAB quantity for your facility 0 _____ Mg/Year
- 7.5) Does the waste contain > 1.0 mg/kg total Benzene? Yes No
- 7.6) What is the total Benzene concentration in your waste? _____ percent of 0 _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602, and 624.)

Section 8 - Waste Constituent Information

→ COMPLETE FOR MICHIGAN DISPOSAL WASTE TREATMENT PLANT AND WAYNE DISPOSAL AND EOIS T&P

- 8.1) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? Yes No
- 8.2) Does this waste contain any MVOC constituents as defined in the EQ Resource Guide? Yes No
- 8.3) Is this waste subject to Subpart CC regulation (i.e., contain ≥ 500 ppm (VOCs) Volatile Organic Compounds)? Yes No
→ If 8.1, 8.2 or 8.3 is "yes" -please indicate the constituents and their concentrations in the table provided in Section 5

Section 9 - Reclamation/Recycling/Fuel Blending

→ Complete for Michigan Recovery Systems ONLY

- 9.1) Heat value (BTU/lb): N/A 9.3) Water (%): N/A
- 9.2) Chlorine(%): N/A 9.4) Solids (%): N/A

Section 10 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Tim Williams Printed Name Tim Williams

Company Pressure Chemical Co. Title PROJECT COORDINATOR Date 9/17/02

The generator's signature must appear on the EQ Waste Characterization Report. If the generator has authorized a third-party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

Sep-16-02 04:11P Envirochem

910 392 4424

P.02

CONSULTING
CHEMISTS

Environmental Chemists, Inc.

6602 Windmill Way • Wilmington, North Carolina 28405
(910) 392-0223 (Lab) • (910) 392-4174 (Fax)
EchemW@aol.com

NC DENR DWQ CERTIFICATE #94, DLS CERTIFICATE #37729

Customer:

WASTE TECHNOLOGY SERVICES
2025 E. Main Street, Suite 101
Richmond, Va 23223
Attn: James Moulds

Date of Report: September 13, 2002**Purchase Order No.:** 6059**Report Number:** 2-4547

REPORT OF ANALYSIS

Date Collected: 08/29/02**Report To:** James Moulds**Sampled By:** Client**Project:****SLUDGE:**

Page 1 of 2

TCLP Metals		Sump Sludge # 10249
Sample ID		
Arsenic, As mg/L		< 1
Barium, Ba mg/L		< 1
Cadmium, Cd mg/L		< 0.2
Chromium, Cr mg/L		< 1
Lead, Pb mg/L		< 1
Mercury, Hg mg/L		< 0.002
Selenium, Se mg/L		< 1
Silver, Ag mg/L		< 1
TCLP Organics		Sump Sludge # 10249
Analyte mg/L	Quantitation Limit mg/L	
Benzene	0.01	0.019
Carbon Tetrachloride	0.01	BQL
Chlorobenzene	0.01	BQL
Chloroform	0.01	0.325
O-Cresol	20	BQL
M-Cresol	20	BQL
P-Cresol	20	BQL
1,4-Dichlorobenzene	0.01	BQL
1,2-Dichloroethane	0.01	BQL
1,1-Dichloroethylene	0.01	BQL
2,4-Dinitrotoluene	0.013	BQL
Hexachlorobenzene	0.013	BQL



CONSULTING
CHEMISTS

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6602 Windmill Way • Wilmington, North Carolina 28405
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EchemW@aol.com

NC DENR: DWQ CERTIFICATE #94, DLS CERTIFICATE #37729

Customer: Waste Technology Services

Report 2-4547

Page 2 of 2

SLUDGE:

TCLP Organics	Quantitation Limit mg/L	Sump Sludge # 10249
Analyte mg/L		
Hexachloro-1,3-Butadiene	0.05	BQL
Hexachloroethane	0.30	BQL
Methyl Ethyl Ketone	0.05	BQL
Nitrobenzene	0.20	BQL
Pentachlorophenol	10	BQL
Pyridine	0.50	BQL
Tetrachloroethylene	0.01	BQL
Trichloroethylene	0.01	BQL
2,4,5-Trichlorophenol	40	BQL
2,4,6-Trichlorophenol	0.20	BQL
Vinyl Chloride	0.01	BQL
Ignitability		< 0.8 mm/sec
Corrosivity as pH units		7.01
Reactivity	Cyanide, CN ⁻ mg/L	< 0.113
	Sulfide, S ²⁻ mg/L	< 0.23

Comments:

BQL = Below Quantitation Limit

Reviewed by: G. K. Stigland

Jewell Heep

Sample Collection and Chain of Custody

NCBDR DWQ Certificate #94, DLE Certificate #37739

Client: Waste Technology Services 2025 E. Main St, Suite 101, Richmond, VA 23223

Email: EchemW@aol.com

Collected By: James G Moulds

Report No: 2-4547

Sample Type: I = Influent, E = Effluent, W = Well, ST = Stream, SO = Soil, SL = Sludge Other:

Sample Identification	Collection			Sample Type	Composite or Grab	Container (P or G)	Chlorine mg/L	LAB ID NUMBER	PRESERVATION							ANALYSIS REQUESTED	
	DATE	TIME	TEMP						NONE	HCL	H ₂ SO ₄	HNO ₃	NO ₂	THIO	OTHER		
Sump Sludge	8/29/02	15:00		SL	C	P		10249	X								TCLP (Metals, VOA's, Semis)
					G	P											Ignitability
					G	P											Corrosivity (pH)
					G	P											Reactivity
					G	P											
					G	P											
					G	P											
					G	P											
					G	P											
					G	P											
					G	P											
					G	P											
					G	P											

NOTICE - DECHLORINATION : Samples for Ammonia, TKN, Cyanide, Phenol, and Bacteria must be dechlorinated (0.2 ppm or less) in the field at the time of collection. See reverse side for instructions.

Transfer	Relinquished By:	Date/Time	Received By:	Date/Time
1.	James G Moulds	8/30/12:25		
2.				

Temperature when Received: _____ Accepted: _____ Rejected: _____ Resample Requested: _____
 Delivered By: James Moulds Received By: [Signature] Date: 8/30/02 Time: 12:25 PM
 Comments: _____

P.04
910 392 4424
Sep-16-02 04:11P Envirochem

Jan 14 03 10:14
Pressure Chemical Co.
910-371-9351
P.7

CT Specialties Corp. Analytical Request Form

6683

TO BE FILLED OUT BY PLANT OPERATOR

Date: <i>9/17/02</i>	Time: <i>9:00</i>	Lot #:	Job #: <i>WTS</i>
-------------------------	----------------------	--------	----------------------

Product Name: <i>Sump Sludge From Warehouse</i>	Product Step: <i>N/A</i>	Operator: <i>JGM</i>
--	-----------------------------	-------------------------

Source:
Composite of 21 drums

URGENT A.S.A.P. DATE NEEDED BY:

RAW MATERIAL IN PROCESS CRUDE OR WET FINAL LOT

Comments: *Needed for disposal determination*

Instructions: *Rin flash pt. to ~150°F.*

TO BE FILLED OUT BY QUALITY CONTROL

TEST PERFORMED	INSTRUMENT #	RESULT	SPECIFICATION
<i>Flash pt.</i>	<i>Closed Cup</i>	<i>No Flash</i>	<i>FYI</i>

ANALYST	<i>C Barnett</i>	NOTEBOOK	<i>Book 24 pg 13</i>
DATE PERFORMED	<i>9/17/02</i>	RETAINED SAMPLE	<i>No</i>
TIME PERFORMED	<i>1000</i>	DECISION	<i>FYI</i>
COMMENT			

Fine Chemical Division

3419 Smallman Street
Pittsburgh, PA 15201-1997
412-682-5882
fax 412-682-5864

Specialty Chemical Division

2271 Andrew Jackson Hwy., NE
PO Box 1956
Leland, NC 28451-1956
910-371-2234
fax 910-371-9351

November 6, 2002

Bobby Nelms
NCDENR
Wilmington Regional Office
127 Cardinal Drive Ext.
Wilmington, NC 28405

Dear Bobby,

As a follow up to your visit of last Wednesday October 30, I want you to know that I have corrected all the deficiencies you noted, and I have implemented all the suggestions you made. I have reinforced training for our supervisors and operators regarding the labeling of containers and maintaining sealed bungs at satellite accumulation areas. Our emergency response services will receive copies of our Emergency Action Plan this week. We welcome every opportunity to receive assistance in operating as a responsible steward of our environment and in complying with all regulatory requirements.

I would welcome a follow up visit to demonstrate our firm commitment to total compliance. Please let me know if you need any further information or if I can be of any assistance. Thank you.

Sincerely,



Tim Williams

Fine Chemical Division
3419 Smallman Street
Pittsburgh, PA 15201-1997
412-682-5882
fax 412-632-5864

Specialty Chemical Division
2271 Andrew Jackson Hwy., NE
PO Box 1956
Leland, NC 28451-1956
910-371-2234
fax 910-371-9351

December 6, 2002

Bobby Nelms
NCDENR
Wilmington Regional Office
127 Cardinal Drive Ext.
Wilmington, NC 28405

Dear Mr. Nelms,

Subsequent to your recent inspection of our facility, it has become clear to me that my understanding of the business processes here at the Pressure Chemical Leland facility is incomplete and that the gaps in my knowledge may have contributed to a misunderstanding by you of those processes and procedures for handling wastes.

We are a custom chemical manufacturer and toll processor of customer owned materials. We also manufacture a very limited number of chemicals for inventory and sale to any and all who wish to purchase. The bulk of our business, however, derives from the custom and toll processing work. The arrangements for work in these areas typically provide either that the customer owns all products, intermediates and byproducts or, in the alternative, that the customer bears the financial responsibility for disposal of any or all of these materials. We assume the legal responsibility for compliance with the laws, rules and regulations governing the various materials we handle for our customers.

These relationships, and the contractual terms by which they are governed, sometimes confuse the issues with regard to the identification of wastes. Though Pressure Chemical Co. personnel may believe that a side stream is of little or no value and is destined to be wasted, it generally requires assent from a customer representative before action is taken formally to designate a particular material as waste. It is then, and only then, that a waste label may be applied to the container. Disposal of the particular waste may have been prearranged but, particularly where the byproduct stream was unanticipated, the container may still need to be assayed and/or profiled in order that disposal options be determined and presented to the customer who owns the material or bears the financial responsibility for its proper disposal.

In respect to the findings of your inspection on October 30, 2002, I wanted to respond with specificity to the discrepancies noted and let you know the actions taken to correct deficiencies in our procedures.

1. Failure to close 2 totes containing hazardous waste located in the hazardous waste storage area.

You observed and photographed a tote with the lid cocked, exposing threads on the tote opening. It has been our practice to allow totes containing mixtures with high vapor pressures to vent in order to avoid destructive deformation due to temperature fluctuations. We have also experienced difficulty refitting lids onto the totes because of damage caused by the lances used to fill them. Though this had been an ongoing problem, we have identified appropriate venting devices for this use and have designed threaded lance stabilizing devices in order to prevent continued deformation of the openings. Once these devices have been delivered and put into use, the current practice shall be discontinued.

2. Failure to document weekly inspections of three of the hazardous waste storage areas.

We have only one recognized hazardous waste storage area, the signed area on the north side of the Blend Room. The material in the other three areas had not been identified by appropriate on-site personnel or by customers as waste. Therefore, it had not been profiled to determine if it had hazardous characteristics.

3. Failure to inspect areas where containers are stored at least weekly (every 7 days).

The hazardous waste storage area inspections have been conducted every week, but not necessarily within 7 days. The "every 7 days" policy is not defined specifically as such in 265.174. The term used in the regulation is "weekly". I had interpreted this to mean "Once a week". In the future, this inspection will be performed not less frequently than every seven days as you have indicated is required.

4. Failure to label or mark 27 totes with the words "Hazardous Waste".

Eight of these totes were located in the hazardous waste storage area with no Hazardous Waste labels on them. They had been identified and noted on the waste inspection of 25 October, but the labels had not yet been applied, a clear failure to adhere to the regulations. The labeling requirement has been reemphasized to all personnel and the waste manager will include this requirement on his checklist for the weekly inspection.

Of the remaining 19 totes, 6 had been identified by the authorized individuals as hazardous waste five days earlier but they had not yet been removed to the hazardous waste storage area. This is the responsibility of each shift supervisor.

The regulations in this regard have been reviewed and each supervisor will have received training in this regard before the end of the month.

The remaining totes either had not yet been identified by the authorized persons as waste or, if previously so identified as waste, had not been characterized as hazardous.

5. Failure to maintain the facility in a manner to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment. Hazardous waste was observed leaking from two of the opened tote containers in the hazardous waste storage area.

You had observed stains on two containers and had concluded that these were leaking. The stains resulted from contained product, diaminocyclohexane, which got on the totes when they were filled. This material will permanently and deeply stain virtually any organic material. There was no liquid on the totes, and there was no evidence of a leak on the pad beneath the totes. Both totes were stored on the hazardous waste pad inside a diked containment area.

6. Failure to provide personnel immediate access to an internal alarm or emergency communication device whenever hazardous waste is being handled.

The phone in the production office about 100 feet from the waste pad has an intercom capability and has been considered our emergency communication device. Upon your recommendation, we have since installed an air horn at the waste pad.

7. Failure to maintain aisle space between containers in the storage areas to the right of the blend room and near the HR-28 vacuum pump.

These two areas had not previously been considered hazardous waste storage areas. They were so designated during the inspection because the totes in the area had not been removed to the designated storage area for 5 days. All of these totes were removed from this area immediately following the inspection and it is not certain whether any of the material in these containers had yet been profiled or officially declared hazardous waste.

8. Failure to describe in the contingency plan the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37

I was unaware that the Contingency Plan required more specific reference to the assignments of responsibility than the designations and phone numbers made by our plan. We had revised the Plan just this past May and had felt it to be

compliant at that time with all regulatory requirements. We are currently awaiting responses from the appropriate agencies so the required additional detail can be added to our contingency plan.

9. Failure to provide annual (365 day) review of the initial training required in 265.16(a)

The annual review training had lapsed for some employees in July. There had been a miscommunication internally with respect to responsibility for training. This oversight was corrected as soon as discovered and annual review training for all employees was completed by October 11.

10. Failure to keep five 55 gallon accumulation drums closed. These drums were located at the WWTP, blend room, HR-28 vacuum pump, vacuum pump #2, and the DCH filter pad container near vacuum pump #2.

These drums contain either hazardous or non-hazardous waste. Training concerning the requirement to keep all drums containing hazardous material closed has been reinforced for operators and supervisors. Appropriate venting devices will be employed where vapor pressure of the content is a concern.

I want you to know that I was personally embarrassed by the results of this inspection. I had believed that I was on top of the regulations and that we were in compliance. The corporate philosophy is clear! Pressure Chemical Co. is committed to responsible environmental stewardship and strict regulatory compliance.

Though this is my last day at the Leland Facility, I am available to be of any assistance in this matter, as required.

Sincerely,
Pressure Chemical Co.



Tim Williams

cc: Randy Newman
Alan Stout
Jason Aull

Roberta Proctor <roberta.proctor@ncmail.net>

Inspection 30 October 2002

- Previous Inspection 24 Oct 2001 (No Violations)

Accumulation - WWTP

HR 28 Vacuum Pump (Waste Vac. Pump Oil) D001, F003, F005

Vacuum Pump #2 (Waste Vac. Pump Oil)

Near Pump #2 (DCH Filter Pads) D002

Blender Room (PTAC) D001

Storage - Left of Blender Room

Right of Blender Room

HR-28 Pump Area - 6 containers

Flammables Area

Hwy 74/76

Info-meal Meeting

looking at storage area,

1st Row

Storage Area left of blender room

2 Unlabeled / Open containers / leaking containers
1 - Boil out DCM (cyclohexane)
1 - Unlabeled. Dicyclohexane?

- Unlabeled. - Boil out from DCM
Unlabeled - water cut from CBHA 9/29/02

9/26/02 - oldest tote accumulation date

1 tote - completely unlabeled -

Unlabeled 3rd row - DCM + H₂O from clean-up
10/26/02 vacuum lines

1-55 gal - anti foam + dirt / water
no waste determination

Blender Room

to right of
(looking @
building)

13 - totes - waste not labeled -

Inadequate Aisle Space

~~Storage~~

To left of blender Rm -
"empty totes"

SAC #1

Blender Room -

1 x 55^{drum} PTAC - - open - ^{waste} label
~~not labeled~~

HR-28 Vacuum Pump.

✓ Waste Oil - "open" - no closed.
1 x 55 gal. "Waste Vac. pump oil"

~~not labeled~~ -
not closed

✓ Vac. pump #2 - 1-55 gal. drum
of waste vac.
pump oil.

possible ✓
3 x 55 gal drum.

across from vac pump #2

→ not labeled
haz waste

Sat.
area?

1 - DCM catalyst filter pads - haz: - open

1 - DBHA salts from BS-22? ~~not~~

1 - unlabeled. - unknown?

needs to determine if it is haz.

{ 5 gallon bucket (labeled w/ HW label)
centrifugate sample - open -
near NT 11

✓ WWTP -
Waste Sludge -

§ Not "closed"

Not sure if it is
haz. waste.

Had shipped as Haz
waste previously

* TCLP - results?

Not currently
labeled as haz waste.

(w/ Pretreatment Permit)

In WWTP near filter press

~~Shirley Williams~~
Stage Coach Trail

Biennial Report for 2000-2001

~~D002~~ Corrosive ~~liquors~~ from polymer treatment
(caustics + sulfur-containing)

Monitoring Wells - for National Starch.

Storage Area

Flammable waste containment

2 x 55 gal. Haz. Waste

{ 10-23-02 1x55 Oil Dry / Diisobutylene
dated & closed labeled
1x55 - DIB

(NOT in contingency plan)

Used oil container in garbage -
taken out +

outside lab

→ Empty - container will be disposed.
COD - Waste Hazardous Waste
(5 gal. corroded at bottom
(Chemical Oxygen Demand waste))

*

lab. - (under fume hood.)
SAC - Lab Solvents in
5 gal(?) ^{flame proof} flammable containers
closed & labeled.
+ 5 gallon? bucket (plastic) of COD waste.

Inspections
performed by Jim Williams.

performed "weekly" but not every seven days (on a consistent basis).

copy
made. *

Noted on 10/25/02 that DCM waste needed labelling & not corrected to date.

Inspection records - oldest records are from - 10/8/01 - some records were ~~acc~~ inadvertently disposed when Jim Williams started (Jan 1, 2002).

Waste minimization - in place
Recycling of ~~so~~ products.

min. of products - to reduce cost of end product to consumer.

Training -

~~Ed Eustace is on~~ All Emergency Contacts are trained.

copies
made.

July 2001, Dec. 2001 } more than ~~365~~
Sept 2002 } 1 year

16 people were late on training for 2002

26 employees

Storage Area

8 Drums labeled/dated

10 Drums

BTMA Salt Cake

20 totes / 8 unlabeled

3 open Release from 2

1 Mystery drum

|||||

Blender Room

13 totes unlabeled

- Aisle Space

- Satellite Drum

- Open PTAC

Blender Room

- Vacuum Plant Oil

- Open

HR-28

- Evidence of attempt to make arrangements w/ local authorities?
- Copy of Annual Report

- 6 totes of Cyclics - Unlabeled

- Open Containers 262.34(a)(3)

- Releases

- Unlabeled Containers 262.34(a)(3)

- Aisle Space 265.35

- Inspection > 7 day lapse

- Open Satellite Containers

Ties in together - 755 gallons in Accumulation (Totes)

- Failure to inspect areas

- Access to Alarm System 265.34

- Contingency Plan must describe arrangements made with local authorities

- Training late. 16 people

Trans

Freehold Cartage NJD054126164

Tri-State Motor Transit MOD 095038998

TSD

Giant Cement Co

Harleyville, SC

SCD003351699

DuPont

Chambers Works/WTP

Deepwater NJ

NJD054126164

Easco

~~El~~ El Dorado, AR

ARD069748192

Michigan Disposl WWT

Belleville, MI

MID000724831

Pressure Chemical Co.

2271 Andrew Jackson Hwy

Leland, NC 28451

(910) 371-2234

Alan Stout EC

40 CFR 262.34(a)(4) - 265.52(a) Failure to describe in the contingency plan the actions facility personnel must take in response to fires, explosions, or any planned or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

40 CFR 262.34(a)(4) - 265.16(c) Failure to provide annual (365 days) ~~training~~ review of the initial training required in ~~262.34(a)~~ 265.16(a).

40 CFR 262.34(c)(1) - 265.173(a) Failure to keep five 55 gallon accumulation drums closed. These drums were located in the WWTP, the blender room, at the HR-28 vacuum pump, ~~the~~ vacuum pump #2, and at the DCH filter pad container near vacuum pump #2.

Flemestle - Storage DIB ~~Dicyclopentadiene~~ Diisobutylene 2 Drums
ODCB/Parthyard - 6 Totes near HR-28 Vacuum Pump Ortho Dichlorobenzene
Totes - Scatter cleanout solution - Right of Blender Room. F002
DCH 2 Leakers Diamino Cyclo Hexane (DCH)

~~262.34(a)(4) - 265.52(c)
Failure to describe arrangements with local authorities~~

Failure to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local ~~authorities~~ emergency response teams to coordinate emergency services, pursuant to Section 265.37.

My Computer
- Pressure Chemical

13
6
8

6 containers in area near
HR 28 - Vacuum Pump

40 CFR 262.34(a)(1)(i) - 265.173(a) Failure to close two totes containing hazardous waste located in the hazardous waste storage area. (DCH, Diaminocyclohexane)

40 CFR 262.34(a)(1)(i) 15 ANAC 13A rule .0110(i) Failure to document weekly inspections ~~for~~ three of the hazardous waste storage areas.

40 CFR 262.34(a)(1)(i) - 265.174 Failure to inspect areas where containers are stored at least weekly (every 7 days)

40 CFR 262.34(a)(3) Failure to label or mark ~~56~~ totes with the words "Hazardous Waste". These containers were located on both sides of the blender room door (Scrubber decont solution) and near the HR-28 Vacuum Pump. (Orthodichlorobenzene) 27

40 CFR 262.34(a)(4) - 265.31 Failure to maintain the facility in a manner to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment. Hazardous waste was observed leaking from two of the opened tote containers in the hazardous waste storage area to the left of the blender room door.
which contained DCH, Diaminocyclohexane

40 CFR 262.34(a)(4) - 265.34(a) Failure to provide personnel with immediate access to an internal alarm system or emergency communication device whenever hazardous waste is being handled.

40 CFR 262.34(a)(4) - 265.35 Failure to maintain adequate aisle space between containers in the storage areas to the right of the blender room door and near the HR-28 vacuum pump.

Oct. 3, 2002

~~What did~~

Actually spoke to T. Williams and I backtracked to the annual report

* - Chemical name as well as waste codes. Lebeard

3 totes

- 2 in storage area — Totes
→ 1 - tote is located where? ←

Waste ad location

- ~~it~~ referred to 3 totes in the inspector's report

* ~~36~~ - 27 - why the variation of number of totes or Totes → waste totes. ←

Training

Job descriptions (Jason Hull) only

* All HW workers trained in 2001 and still employed. — Training records.

Spent vacuum pump oil + entrapped ignitable solvent
0001, F002, F003, F005, 0041

- Blender Room (PTAC) Ignitable spent solvent
- DCH Filter Pad - Dimino Cyclohexane - Not waste For recycling -
- Vacuum Pump Oil
- WWTP Sludge - ODBC

- All HW handlers training records for 2001
 - Jason Hull - Job Description

- What is ODCB Ortho Dichlorobenzene
- What is DCH

259-1210

- 262.34(a)(1)(i) - 265.173(a) Open containers in storage.
- 262.34(a)(1)(i) 15A NCAC 13A rule .0110(i) Weekly Inspections
- 262.34(a)(1)(i) - 265.174 Must perform weekly inspections
- ? ~~262.34(a)(2) Failure to mark containers with ^{accumulation} inspection date.~~
- 262.34(a)(3) Storage containers must be marked with "Haz Waste"
- 262.34(a)(4) - 265.31 Facility must be maintained to minimize release of Haz Waste.
- 262.34(a)(4) - 265.34 (a) or (b) Access to alarm system.
- 262.34(a)(4) - 265.35 Required Aisle Space.
- ~~262.34(a)(4) - 265.37(a) Arrangements with local authorities.~~
- 262.34(a)(4) - 265.52 (a) Contingency plan must ~~be~~ contain a description of the actions to be taken
- 262.34(a)(4) - 265.16(c) Facility personnel must review training annually
- 262.34(c)(1) - 265.173(a) Open satellite container

D001, D002, D007, D038

F005 F003 F002 U041

40 CFR 262.34(a)(1)(i) - 265.173(a) Failure to close two totes containing hazardous waste located in the hazardous waste storage area.

40 CFR 262.34(a)(1)(i) 15 ARKAC 13A rule .0110(i) Failure to document weekly inspections of three of the hazardous waste storage areas.

40 CFR 262.34(a)(1)(i) - 265.174 Failure to inspect areas where containers are stored at least weekly (every 7 days.)

40 CFR 262.34(a)(3) Failure to label or mark 36 totes with the words "Hazardous Waste". These containers were located on both sides of the blender room and near the HR-28 Vacuum Pump.

40 CFR 262.34(a)(4) - 265.31 Failure to maintain the facility in a manner to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment. Hazardous waste was observed leaking from two of the opened tote containers in the hazardous waste storage area.

40 CFR 262.34(a)(4) - 265.34(a) Failure to provide personnel ~~with~~ immediate access to an internal alarm system or emergency communication device whenever hazardous waste is being handled.

40 CFR 262.34(a)(4) - 265.35 Failure to maintain aisle space between containers in the storage areas to the right of the blender room and near the HR-28 vacuum pump.

12 CFR 262.34 (c)(4) - 265.52 (c) Failure to describe in the contingency plan the actions facility personnel must take to respond to fires, explosions, or any planned or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

40 CFR 262.34 (a)(4) - 265.16 (c) Failure to provide annual (365 days ~~training~~) review of the initial training required in ~~262.34 (a)~~ 265.16 (a).

40 CFR 262.34 (c)(1) - 265.173 (a) Failure to keep five 55 gallon accumulation drums closed. These drums were located in the WWTP, the blender room, at the HR-28 vacuum pump, ~~the~~ vacuum pump #2, and at the DCH filter pad container near vacuum pump #2.

Pressure Chemical
NCD 091572073
30 Oct. 2002



- Storage area to the right of blender room. (D002, DCH Scrubber Cleanout Solution)
- 262.34(a)(1)(i) 15A NCAC 13A rule.0110(i)
 - 262.34(a)(1)(i) - 265.174
 - 262.34(a)(4) - 265.35
 - ~~262.34(a)(1)(i) - 264.174 RKN~~
 - 262.34(a)(3)



- Storage area near HR-28 vacuum pump. Six totes of A (F002, ODCB)
- 262.34(a)(1)(i) 15A NCAC 13A rule.0110(i)
 - 262.34(a)(1)(i) - 265.174
 - 262.34(a)(4) - 265.35
 - 262.34(a)(3)

Pressure Chemical
NCD 091572073
30 Oct. 2002



3

Storage area to the left of blander room. (D002, DCH Scrubber Cleanout Solution)

- 262.34(a)(1)(i) - 265.174

262.34(a)(4) - 265.34(a)

- 262.34(a)(3)

262.34(a)(1)(i) - 265.173(a)

- 262.34(a)(4) - 265.31



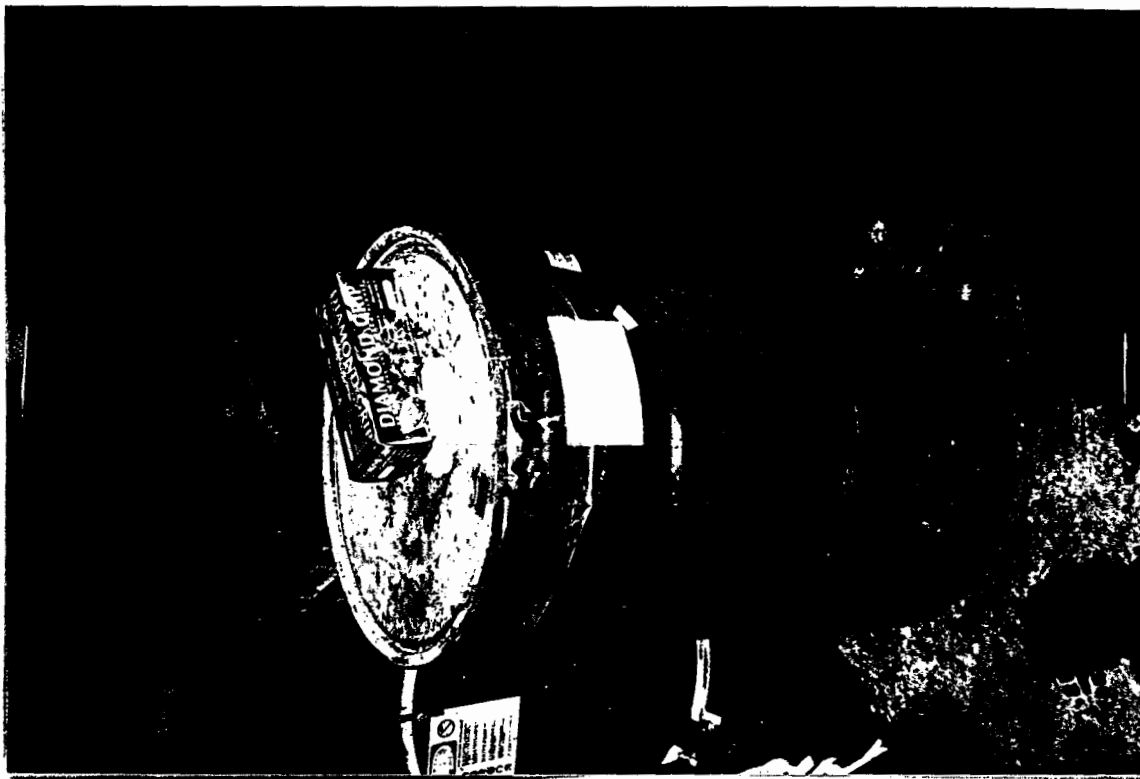
4

Closeup of above photo

262.34(a)(1)(i) - 265.173(a)

262.34(a)(4) - 265.31

Pressure Chemical
NCD 091572073
30 Oct. 2002



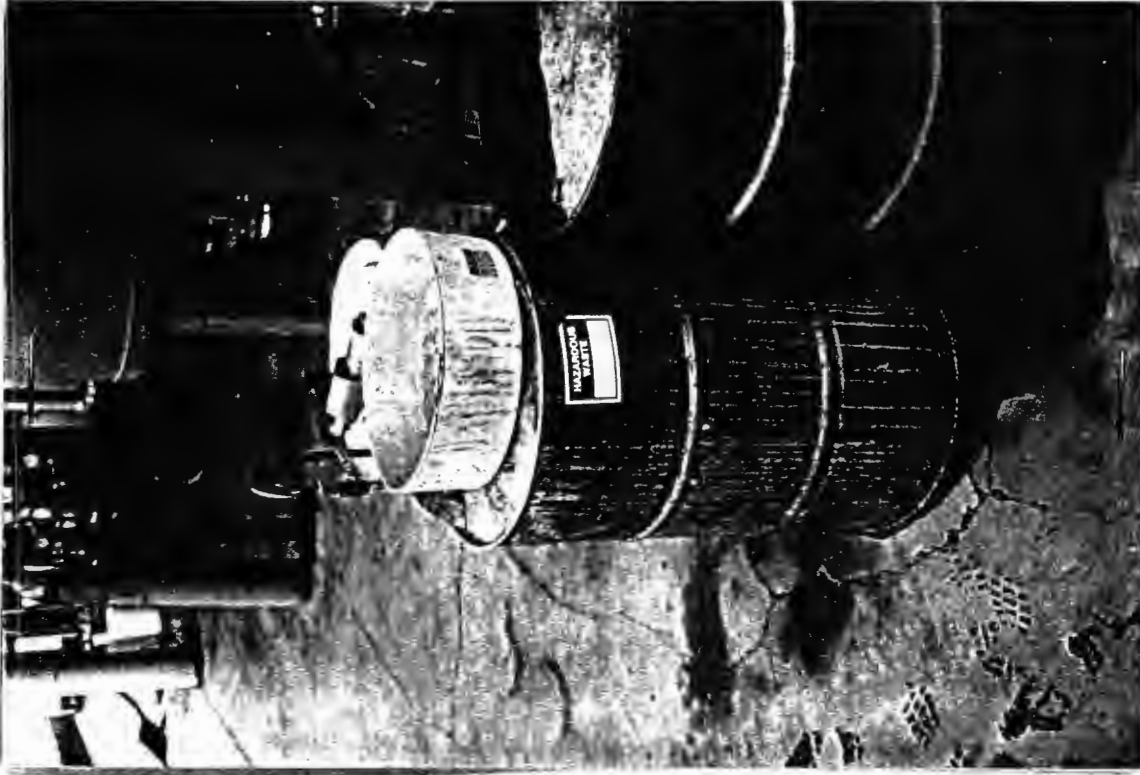
Accumulation drum in WWT
262.34 (c)(1) - 265.173(a)



Storage area - Same containers
262.34 (a)(1)(i) - 265.173(a)
262.34 (a)(4) - 265.31

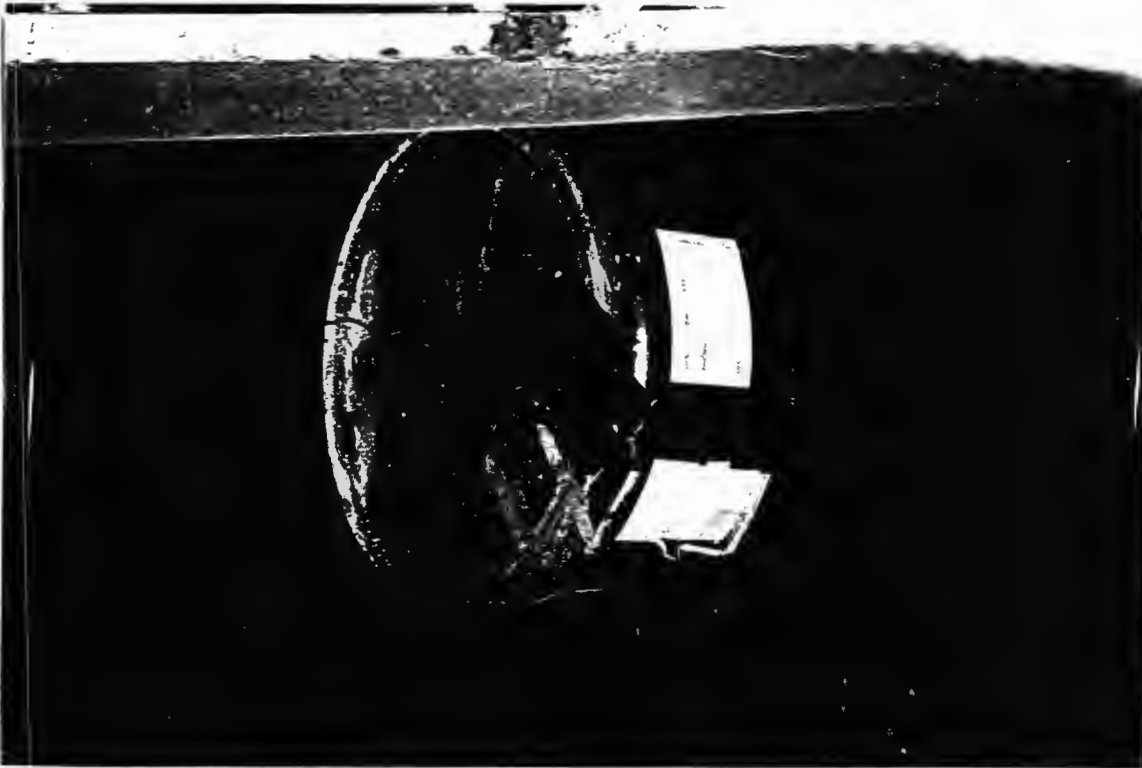
Pressure Chemical
NCD 091572073
30 Oct. 2002

8



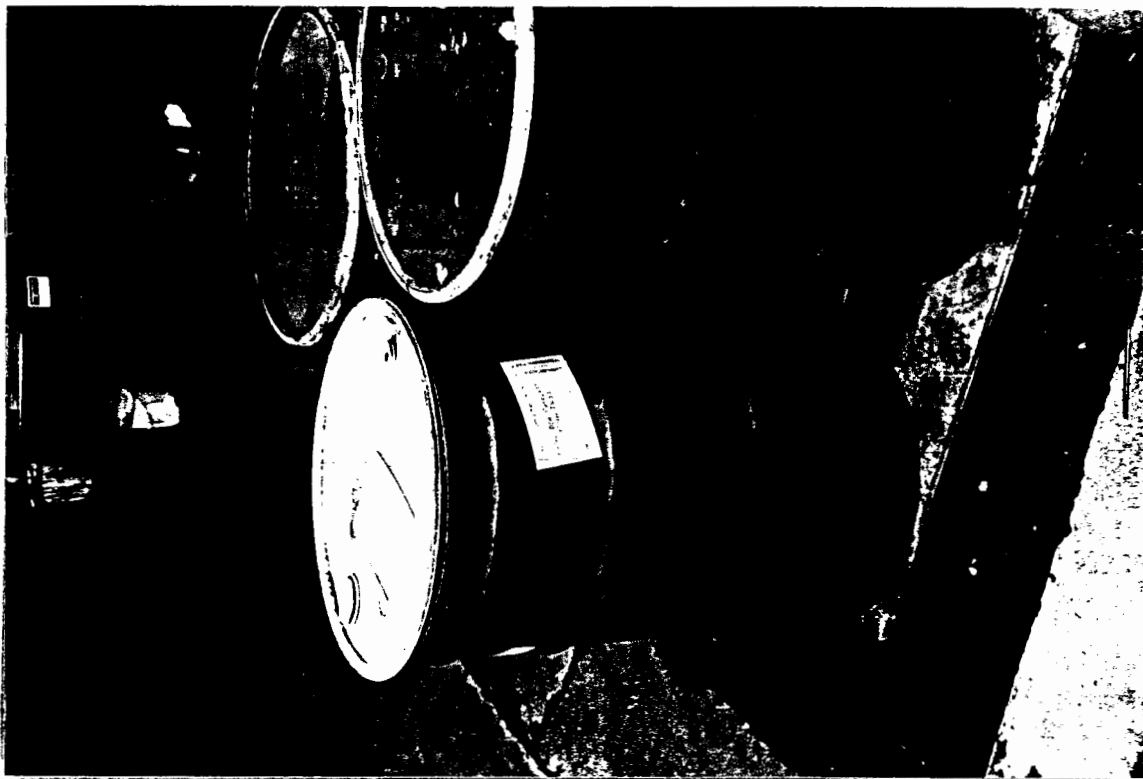
Waste vacuum pump oil D001, F003, F005
at HR-28 vacuum pump.
262.34 (c)(1) - 265.173(a)

7

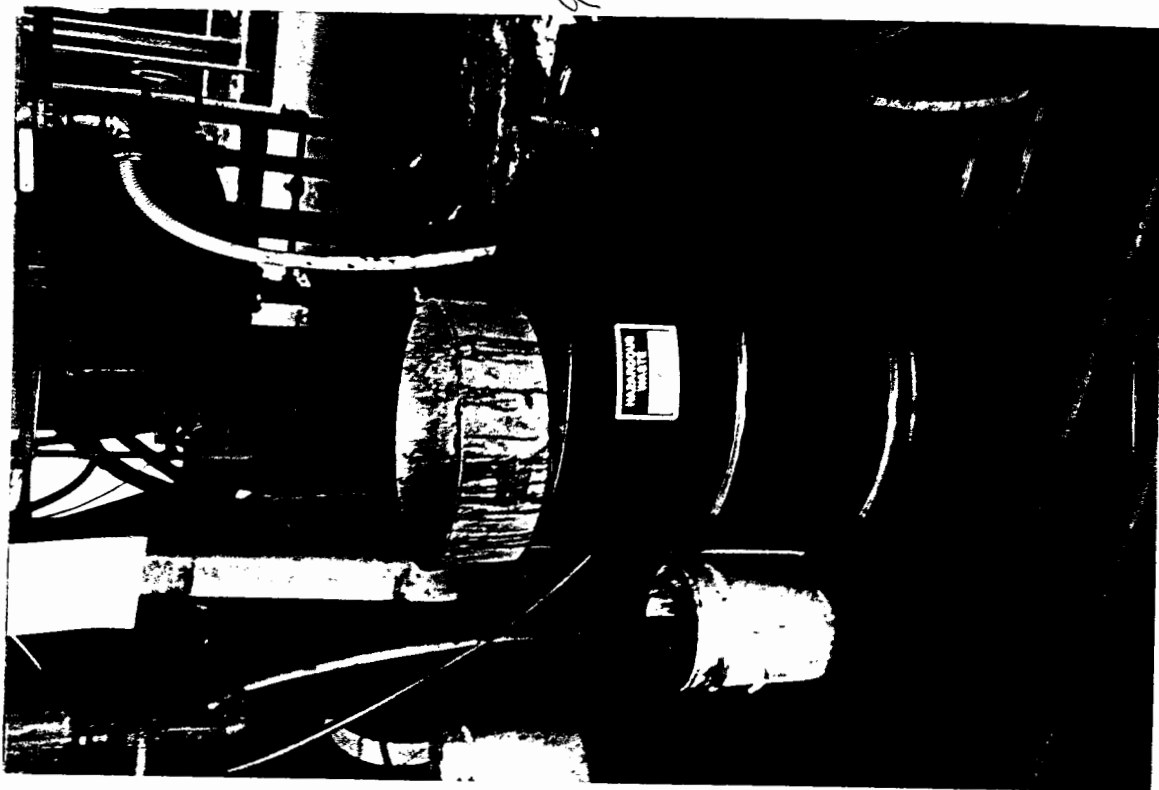


Accumulation drum in blender room.
262.34 (c)(1) - 265.173(a)

10



DCH Filter pad container. Note drum
pictured to left in background.
202.34 (c)(1) - 265.173 (a)



Waste Vacuum Pump Oil 0001, F003, F005
at vacuum pump #2.
202.34 (c)(1) - 265.173 (a)



STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT, AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

JAMES B. HUNT JR.
GOVERNOR

COMPLIANCE INSPECTION

Facility Name: CT Specialties Corp. SIC# 2869

WAYNE MCDEVITT
SECRETARY

EPA ID: NCD 091 572 073

Contact: Melvin Miller plant manager 910 371 2234

WILLIAM L. MEYER
DIRECTOR

Address: 2271 Anderson Jackson Highway
Leland N.C. 28451

Status: LQ6

Ownership: Stock owned by three stockholders M. Miller owning 45%

Facility Description: CT Specialties Corp. is located south side of Hwy 74/76
Leland, N.C. Many of chemicals, pharma intermediates for their
customers needs. Syn. organic chemicals - Series of different reactions
No. Recl products - different products depending on customer's needs

Waste Generation Processes:
USDOT Non-Regulated Waste Water Dupont - Phenol
Waste Perchloroethylene Hydrochloric Acid Sodium Chloride Phenol
heptane and methanol waste
Waste maleic anhydride
Acetophenone / Sodium dithionite mixtures
methylaniline, aqueous solution

Waste Types: D039 , F003 , D001
U147 , V004 , D003

Facility Name: CT Specialties Corp ID# NCD 091 572 023 Pg 2

Transporters: S.J. Transportation Co NJD 016 299 976
Giant Cement Company SCD 003 351 699
Freehold Cartage Inc MSD 054 126 164
TRI STATE MOBILE TRM MOD 095 038 998 Phyllman Chemical Corp &

TSDF: DuPont NJD 602 385 230
Giant Cement Company SCD 003 351 699
Johnson Matthey - Precious Metal Div. NJD 980 755 367
North East Chemical Corp. OAD 980 681 571
Phyllman Chemical Corp. VAD 003 111 416

Accumulation Areas: - Process Areas

Storage Areas: outside process area

Waste Minimization: yes.

Deficiencies: 265.16(c) Annual Review & training
265.16(d) job descriptions Not on file
(2)

Recommendations:

Waste Management Specialist: L.F. Worcester

Facility Contact: Melvin Miller

Date: 8-24-98

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

To: MELVIN MILLER - CT SPECIALTIES CORP.
Address: 2271 ANDREW JACKSON HIGHWAY
LELAND, N.C. 28451
EPA ID# NC D 091 572 073

Docket # 98-246
Inspection Date 08-24-98
Facility Type LOG

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 08-24, 1998, L.F. WORRELL representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Citation	Specifics
<u>40 CFR 262.34</u>	<u>265.16(c) Facility personnel must take part in an annual review of the initial training required in paragraph (c) of this section.</u>
	<u>265.16(d) (1) documentation of the job title for each position at the facility related to hazardous waste management ...</u>
	<u>(2) A written job description for each position under paragraph (d) (1) of this section. ...</u> <u>see attachment</u>

You are hereby required to comply with the noted violation(s) by Sept. 9, 1998, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

8-28-98 (Date) L.F. WORRELL
N.C. Hazardous Waste Section

I, A.L. Wood, hereby certify that I have personally served a copy of this Notice on:

CT SPECIALTIES CORP at 2271 ANDREW JACKSON HIGHWAY, LELAND, N.C.
(Name) (Location)

on _____, 19____ (Recipient Signature)

copies to: field files
central files
Regional Manager

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>Norbert Banetta</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery <i>2/26</i></p>
<p>1. Article Addressed to:</p> <p><i>Mr. Alan Stout Pressure Chemical Co. 2271 Andrew Jackson Hwy NE Leland, NC 28451</i></p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7002 2410 0006 9368 0972</p>
<p>PS Form 3811, August 2001</p>	<p>Domestic Return Receipt 102595-02-M-1540</p>


7002 2410 0006 9368 0972

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OFFICIAL USE

Postage	\$	<i>37</i>
Certified Fee		<i>2.30</i>
Return Receipt Fee (Endorsement Required)		<i>1.75</i>
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	<i>4.42</i>



Sent To *Mr. Alan Stout - Pressure Chemical Co.*

Street, Apt. No., or PO Box No. *2271 Andrew Jackson Hwy NE*

City, State, ZIP+4 *Leland, NC 28451*

PS Form 3800, June 2002 See Reverse for Instructions

State of North Carolina
Department of Environment
and Natural Resources
Wilmington Regional Office

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Waste Management
Hazardous Waste Section



February 24, 2003

CERTIFIED MAIL 7002 2410 0006 9368 0972

Mr. Alan Stout
Pressure Chemical Company
2271 Andrew Jackson Highway NE
Leland, NC 28451

Dear Mr. Stout:

Please find enclosed, a copy of the inspection form written for my inspection of your facility on October 30, 2002.

If you have any questions regarding this inspection, please feel free to contact me at (910) 395-3900, ext. 350.

Sincerely,

A handwritten signature in black ink, which appears to read 'Robert K. Nelms', is written over a yellow rectangular highlight.

Robert K. Nelms
Waste Management Specialist

RKN:bfr
enclosure

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

COMPREHENSIVE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Name: Pressure Chemical Co.
EPA ID Number: NCD 091 572 073
Type of Facility: Large Quantity Generator
Facility Location: 2271 Andrew Jackson Hwy NE
Leland, NC 28451
Telephone Number: (910) 371-2234

OWNERSHIP: Pressure Chemical Corporation

2. FACILITY CONTACT: Tim Williams, Project Coordinator

3. SURVEY PARTICIPANTS: Tim Williams, Jenny Rankin
Robert K. Nelms - NCDENR

4. DATE OF INSPECTION: 30 October 2002

5. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268 and 279.

6. FACILITY DESCRIPTION:

Pressure Chemical Company, located on Hwy 74 West of
Wilmington, NC, manufactures specialty chemicals and provides
custom manufacturing of chemicals for others.
The company has POTW pretreatment and stormwater permits.
An active groundwater remediation system is on the site, however
it is maintained by National Starch and Chemical Corp.

7. HAZARDOUS WASTE STREAMS INCLUDE:

Solvent solvents and by products of distillation.
D001, D002, D007, D038, F002, F003, F005, U041
* See annual report *

8. AREAS OF REVIEW AND INSPECTION :

- ▶ Emergency Preparedness Contingency Plan
- ▶ Inspection Records (storage) Manifests / LDR
- ▶ Training Records Biennial Report
- ▶ Transporters:
 - Freehold Cartage NJD 054 126 164
 - Tri-State Motor Transit MOD 095 038 998
- ▶ TSD's:

<u>Giant Cement Co.</u>	<u>DuPont</u>	<u>Enasco</u>	<u>Michigan Disposal/WWT</u>
<u>SCD 003 351 699</u>	<u>NJD 054 126 164</u>	<u>ARD 069 748 192</u>	<u>MID 000 724 831</u>
- ▶ Accumulation Areas:
 - Lab - Closed + labeled containers, Blender Room - Open 55 gal Drum,
 - HR-28 Vacuum Pump - Open 55 gal. Drum, Across From
 - Vacuum Pump #2 - Open 55 gal. Drum, Vacuum Pump #2 - Open 55 gal Dr
- ▶ Storage Areas:
 - Left of Blender Room - 18/55 gal drums - 20 totes, 8 unlabeled, 3 open
 - Right of Blender Room - 13 totes unlabeled, inadequate aisle space, no inspections
 - Near HR-28 Pump - 15 totes unlabeled, inadequate aisle space, no inspections
- ▶ ~~External Condition of Facility:~~ Flammable Storage Bldg. - Two 55 gal. drums no insp.

9. WASTE MINIMIZATION: Recycling + minimization of products

10. SITE DEFICIENCIES:

262.34(a)(1)(i) - 265.173(a)262.34(a)(1)(i) 15A NCAC 13A rule .0110(i)262.34(a)(1)(i) - 265.174262.34(a)(3)262.34(a)(4) - 265.31262.34(a)(4) - 265.34(a)

11. RECOMMENDATIONS:-

262.34(a)(4) - 265.35262.34(a)(4) - 265.52(c)262.34(a)(4) - 265.16(c)262.34(c)(1) - 265.173(a)Robert K. Nelms

DATE: _____

DATE: _____

Robert K. Nelms

Facility Representative

Waste Management Specialist, NCDENR

Pressure Chemical

40 CFR 262.34 (a)(1)(i) – 265.173 (a) Failure to close two totes containing hazardous waste (DCH [Diaminocyclohexane] Scrubber Cleanout Solution, D002) located in the hazardous waste storage area.

40 CFR 262.34 (a)(1)(i) 15A NCAC 13A rule .0110(i) Failure to document weekly inspections for three of the hazardous waste storage areas.

40 CFR 262.34 (a)(1)(i) – 265.174 Failure to inspect areas where containers are stored at least weekly (every 7 days).

40 CFR 262.34 (a)(3) Failure to label or mark 27 totes with the words “Hazardous Waste.” These containers were located on both sides of the blender room door (DCH [Diaminocyclohexane] Scrubber Cleanout Solution, D002) and near the HR-28 vacuum pump (ODCB [Orthodichlorbenzene] F002).

40 CFR 262.34 (a)(4) – 265.16 (c) Failure to provide annual (365 days) review of the initial training required in 265.16 (a).

40 CFR 262.34 (a)(4) – 265.31 Failure to maintain the facility in a manner to minimize the possibility of a fire, explosion, or any unplanned sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment. Hazardous waste was observed leaking from two of the opened tote containers which contained DCH Scrubber Cleanout Solution, D002. These containers were located in the hazardous waste storage area to the left of the blender room.

40 CFR 262.34 (a)(4) – 265.34 (a) Failure to provide personnel with immediate access to an internal alarm or emergency communication device whenever hazardous waste is being handled.

40 CFR 262.34 (a)(4) – 265.35 Failure to maintain adequate aisle space for emergency response and inspections between the containers located in the storage areas to the right of the blender room door and near the HR-28 vacuum pump.

40 CFR 262.34 (a)(4) – 265.52 (c) Failure to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.

40 CFR 262.34 (c)(1) – 265.173 (a) Failure to keep five 55 gallon accumulation drums closed. These drums were located in the WWTP, the blender room, at the HR-28 vacuum pump (waste vacuum pump oil D001, F003, F005) vacuum pump #2 (waste vacuum pump oil D001, F003, F005), and at the DCH filter pad container near vacuum pump #2.



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

June 4, 2003

William G. Ross Jr., Secretary

Jim Tarr
Bobby Nelms

MEMORANDUM

To: Jim Gulick
Senior Deputy Attorney General

From: Dan Oakley *DO*
General Counsel

Re: Petition for Contested Case Hearing;
Pressure Chemical Company vs. DENR, Division of Waste Management



Attached please find a Petition for Contested Case Hearing filed by Pressure Chemical Company against the Division of Waste Management. Please assign an attorney to represent the Division. Thanks.

cc: Dexter Matthews (with attachment)

Attachment

STATE OF NORTH CAROLINA
COUNTY OF NEW HANOVER

IN THE OFFICE OF
ADMINISTRATIVE HEARINGS
FILE NO. 03-EHR-

PRESSURE CHEMICAL CO.)
)
Petitioner,)
)
v.)
)
N.C. DIVISION OF WASTE)
MANAGEMENT, N.C. DEPT.)
OF ENVIRONMENT AND)
NATURAL RESOURCES,)
)
Respondent.)

RECEIVED
OFFICE OF GENERAL COUNSEL

MAY 30 2003

PETITION FOR CONTESTED ENVIRONMENT &
CASE HEARING NATURAL RESOURCES

003269

NOW COMES PETITIONER, by and through counsel, pursuant to N.C.G.S. 150B-23, N.C.G.S. 130A-22, 15A N.C.A.C. 13B-0704, and 26 N.C.A.C. 3.0103(a), and commences this contested case by the filing of this Petition For Contested Case Hearing. In support, Petitioner says as follows:

1. On April 30, 2003, the Hazardous Waste Section (HWS), within the Department of Environment and Natural Resources (DENR), Division of Waste Management (DWM), issued a "Compliance Order With Administrative Penalty" (Order) against Petitioner Pressure Chemical Co.
2. The act of issuing the Order is a final agency decision ripe for administrative appeal in accordance with the provisions of Article 3 of Chapter 150B of the North Carolina General Statutes.
3. The contents of the Order addressed certain matters arising out of an October 30, 2002 inspection of Petitioner's Leland, North Carolina facilities.
4. The conclusions of the Order (which are disputed by Petitioner in many respects) were that Petitioner had committed a number of "major" violations and should be assessed a total of \$47,500 in civil penalties.
5. Prior to receipt of this Order, Petitioner had never been assessed any civil penalties at the Leland, NC facility.
6. Prior to receipt of this Order, Petitioner's Pennsylvania facility had never been cited for any major RCRA or state solid/hazardous waste law violations in almost 40 years of operation.

7. The primary contact person for Petitioner's Leland, NC facility was not present on the date of Respondent's (unannounced) October 30, 2002 inspection. As a result, the person who accompanied Respondent's inspector was not in a position to properly and fully address many of the questions and issues raised by Respondent during the inspection, including critical issues such as whether materials were, in fact, solid wastes or hazardous wastes under applicable state and federal law.

8. None of the alleged violations asserted by Respondent as contained in the Order involved any discharges, spills or releases of hazardous waste.

9. None of the alleged violations asserted by Respondent as contained in the Order involved any damage to public or private property.

10. As to the assessment of a \$2,500 civil penalty for missing an annual training requirement by approximately two months, Petitioner respectfully disagrees with Respondent's characterization of such violation as a major deviation from the annual training requirement. Upon information and belief, this deviation properly should be characterized as a minor deviation, with minor nature and degree of harm, thus resulting in an appropriate civil penalty assessment of \$220-\$500.

11. As to the assessment of a \$22,500 civil penalty for alleged failure to close and inspect containers, and document inspections in generator and satellite accumulation areas, Petitioner respectfully disagrees with Respondent's characterization of the deviation from requirements and nature and degree of harm as "major." When all of the circumstances are properly considered, Petitioner respectfully asserts that the degree and nature of harm should be characterized as minor or moderate, and the degree of deviation from applicable requirements should be characterized as minor or moderate, thus resulting in an appropriate civil penalty somewhere between \$250 and \$8,000.

12. As to the assessment of a \$22,500 civil penalty for alleged failure to properly label totes, maintain appropriate aisle space and document local police and fire arrangements, Petitioner respectfully disagrees with Respondent's characterization of the deviation from requirements and nature and degree of harm as "major." When all of the circumstances are properly considered, Petitioner respectfully asserts that the degree and nature of harm should be characterized as minor or moderate, and the degree of deviation from applicable requirements should be characterized as minor or moderate, thus resulting in an appropriate civil penalty somewhere between \$250 and \$8,000.

13. Respondent's factual and legal conclusion that hazardous wastes were spilled as stated in either the Order or other supporting documents are erroneous as a matter of fact and law.

14. Respondent's conclusions and determinations as to which containers contained solid or hazardous wastes, as to whether certain locations within the Leland facility were satellite accumulation areas, as to whether inspections were properly made

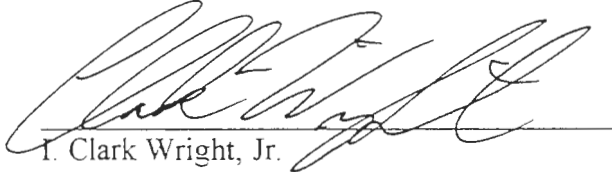
on a weekly basis, and as to whether inspection logs were in compliance were erroneous as a matter of law and fact.

15. Upon information and belief, some of the verbal responses made to Respondent by Mr. Tim Williams, a former employee of Petitioner, were either factually incorrect or were made without proper authorization from Petitioner.

16. Based upon the above, and upon further information obtained as a result of discovery in this matter, and as stated in any subsequent prehearing statements or other filings, Petitioner respectfully contends that Respondent's actions: (a) in whole or in part unlawfully ordered Petitioner to pay a civil penalty; (b) in whole or in part substantially prejudiced Petitioner's rights; (c) in whole or in part exceeded Respondent's authority or jurisdiction; (d) in whole or in part were erroneous; (e) in whole or in part failed to use proper procedure; (f) in whole or in part constituted arbitrary and capricious agency action; and (g) in whole or in part constituted a failure to act as required by law or rule.

17. Petitioner files this petition to preserve fully all of its legal rights. However, Petitioner would like to request that Respondent's counsel immediately contact Petitioner's counsel to discuss the potential for informal settlement discussions designed to resolve this matter in full.

This the 29th day of May, 2003.



I. Clark Wright, Jr.
N.C. Bar No. 011163
Ward and Davis, LLP.
409 Pollock Street
New Bern, NC 28560
252-633-1101
252-633-9400 (fax)
Attorneys for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the forgoing PETITION FOR CONTESTED CASE HEARING has been served on the State Agencies and persons listed below by depositing a copy of the same in the care of the United States Post Service, postage prepaid, addressed as follows:

Daniel C. Oakley, Esq.
DENR General Counsel
1601 Mail Service Center
Raleigh, NC 27699-1601

Kathleen Waylett, Esq.
N.C. Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629

This the 29th day of May, 2003.



I. Clark Wright, Jr.
N.C. Bar No. 011163
Ward and Davis, LLP.
409 Pollock Street
New Bern, NC 28560
252-633-1101
252-633-9400 (fax)
Attorneys for Petitioner

MAIL THE COMPLETED FORM TO: The appropriate EPA Regional or State Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
1. Reason for Submittal (see instructions on page 10) CHECK CORRECT BOXES	A. Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste or used oil activities). <input checked="" type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #) <input checked="" type="checkbox"/> As a component of Hazardous Waste Report.	
2. Site EPA ID Number (see instructions on page 11)	EPA ID Number: NCD091572073	
3. Site Name (see instructions on page 11)	Site Name: Pressure Chemical Co. Leland facility	
4. Site Location Information (see instructions on page 11)	Street Address: 2271 Andrew Jackson Highway	
	City, Town or Village: Leland	State: NC
	County Name: BRUNSWICK	Zip Code: 28451
5. Site Land Type (see instructions on page 11)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
6. North American Industry Classification System (NAICS) Code(s) for the Site (see instructions on page 11)	A. 325998	B. 325211
	C.	D.
7. Site Mailing Address (see instructions on page 12)	Street or P.O. Box: PO Box 1956	
	City, Town or Village: Leland	
	State: NC	
	Country: UNITED STATES	Zip Code: 28451
8. Site Contact Person (see instructions on page 12)	First Name: Edward	MI: J Last Name: Eustace
	Phone Number: 9103712234	Phone Number Extension: 28
9. Legal Owner and Operator of the Site (see instructions on page 12 and 13)	Name of Site's Legal Owner: Pressure Chemical Co.	
	Date Became Owner (mm/dd/yyyy): 01/01/2002	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
	Name of Site's Operator: Pressure Chemical Co.	
Date Became Operator (mm/dd/yyyy): 01/01/2002		
Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 13, 14, 15 and 16)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste
(choose one of the following three categories)

a. LQG: Greater than 1000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or

b. SQG: 100 to 1000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or

c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

d. United States Importer of Hazardous Waste

e. Mixed Waste (hazardous and radioactive) Generator

For items 2 through 6, check all that apply:

2. Transporter of Hazardous Waste

3. Treater, Storer or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.

4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.

5. Exempt Boiler and/or Industrial Furnace

a. Small Quantity On-Site Burner Exemption

b. Smelting, Melting, Refining Furnace Exemption

6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (refer to your State regulations to determine what is regulated). Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>

2. Destination Facility for Universal Waste
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. Used Oil Transporter - Indicate type(s) of activity (ies)

a. Transporter

b. Transfer Facility

2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity (ies)

a. Processor

b. Re-refiner

3. Off-Specification Used Oil Burner

4. Used Oil Fuel Marketer - Indicate Type(s) of Activity (ies)

a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (see instructions on page 16)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D007	D038	F002	F003	F005
U041						

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if needed for more waste codes.

12. Comments (see instructions on page 17)

Prior site ownership was listed as CT Specialties Corporation. This was a wholly-owned subsidiary of Pressure Chemical Co. of Pittsburgh, PA

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (see instructions on page 17)

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
<i>Alan C. Stout</i>	Alan C Stout, General Manager	03/28/2002

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

ITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Corrosive liquors from polymer treatment; contain caustics and sulfur-containing			
B. EPA Hazardous Waste Codes (page 22)		D002	NA	C. State Hazardous Waste Codes (page 22)	
		NA	NA		
D. Source Code (page 23)	G07	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	
Management Method Code for Source Code G25					
				G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
				4,737.000000	5
					Density
					9.60
				<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)	
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)
		Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	NJD002385730	H081	6,237.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 8 process liquors

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Corrosive aqueous liquors from condensation; contain glyoxal, urea and trace				
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)			
D. Source Code (page 23)		E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G08 Management Method Code for Source Code G25				4,080.000000	5 Density 8.75
		<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

Sec. 2	Was any of this waste managed on-site? (page 24)			
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)				
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)		On-site Management Method Code (page 24)		
Quantity treated, disposed or recycled on-site in 2001 (page 25)		Quantity treated, disposed or recycled on-site in 2001 (page 25)		

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	NJD002385730	H081	8,080.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments: Mother liquors and process washes Job 10

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvents from alkylation; contains Toluene and Methanol			
B. EPA Hazardous Waste Codes (page 22)		D001	F005	C. State Hazardous Waste Codes (page 22)	
NA		NA	NA		
D. Source Code (page 23)	G24	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	<input type="checkbox"/> Yes
Management Method Code for Source Code G25				G. Quantity Generated in 2001 (page 22)	4,515.000000
				H. UOM (page 23)	5
				Density	7.50
				<input checked="" type="checkbox"/> lbs/gal	<input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)			
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	SCD003351699	H050	3,650.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	SCD036275626	H050	200.000000	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	WVD981107600	H061	455.000000	

Comments: Job 10 still bottoms

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvent from quaternization; contains aliphatic alcohol and	
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)	
D001 NA NA NA NA			
D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)
G24			
Management Method Code for Source Code G25		<input type="checkbox"/> Yes	H. UOM (page 23) Density 5 7.50
			<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)	
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)
		Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	3,090.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD036275626	H050	650.000000
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 16 still bottoms

PTAC - Trimethyl phenyl ammonium chloride

CN(C)(C)c1ccccc1.[Cl-]

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

TE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Ignitable spent solvent from quaternary anion exchange; contains hydrocarbon and				
B. EPA Hazardous Waste Codes (page 22)	D001	F003	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G24	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
				1,810.000000	5
Management Method Code for Source Code G25			<input type="checkbox"/> Yes		Density 6.00
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1	ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	On-site Management Method Code (page 24)
Quantity treated, disposed or recycled on-site in 2001 (page 25)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	1,080.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	WVD981107600	H061	45.000000
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Distillate from Job 25

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

FORM GM

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvent from distillation of aliphatic amine			
B. EPA Hazardous Waste Codes (page 22)		D001	NA	C. State Hazardous Waste Codes (page 22)	
		NA	NA		
D. Source Code (page 23)	G24	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	
Management Method Code for Source Code G25					
				G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
				900.000000	5
					Density
					7.82
				<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)	
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)
		Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	900.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Distillate from Job 29

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1 A. Waste Description (page 22) Aqueous liquors from recrystallization of aliphatic nitrile					
B. EPA Hazardous Waste Codes (page 22) D007 NA NA NA NA		C. State Hazardous Waste Codes (page 22)			
D. Source Code (page 23) G08 Management Method Code for Source Code G25	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23) <input type="checkbox"/> Yes	G. Quantity Generated in 2001 (page 22) 10,900.000000	H. UOM (page 23) 5 Density 8.34 <input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

Sec. 2 Was any of this waste managed on-site? (page 24) <input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3 A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26) <input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) NJD002385730	C. Off-site Management Method Code Shipped to (page 26) H081	D. Total quantity shipped in 2001 (page 26) 10,900.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 30 mother liquors

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

TE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1					
A. Waste Description (page 22) Spent solvent from vessel cleanout; contains aliphatic alcohol					
B. EPA Hazardous Waste Codes (page 22)		D001 F003		C. State Hazardous Waste Codes (page 22)	
NA NA NA					
D. Source Code (page 23)		E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
G13				2,902.000000	5
Management Method Code for Source Code G25			<input type="checkbox"/> Yes		Density 6.60
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	
Was any of this waste managed on-site? (page 24)	
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)	
<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3			
A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	1,737.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	WVD981107600	H061	1,165.000000
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Cleanouts from Job34

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



**FORM
GM**

**U.S. ENVIRONMENTAL
PROTECTION AGENCY**

2001 Hazardous Waste Report

**WASTE GENERATION
AND MANAGEMENT**

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Aqueous process liquors from polymer precipitation; contain Pyridine and				
B. EPA Hazardous Waste Codes (page 22)	D038	NA	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G08	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	43,466.000000	Density 5
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg 8.35

Sec. 2	Was any of this waste managed on-site? (page 24)			
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	NJD002385730	H081	43,466.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments: Job 38 mother liquors and 1st wash

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvent from vessel cleanout; contains aliphatic alcohol			
B. EPA Hazardous Waste Codes (page 22)		D001	F005	C. State Hazardous Waste Codes (page 22)	
NA		NA	NA		
D. Source Code (page 23)	G13	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	
Management Method Code for Source Code G25				<input type="checkbox"/> Yes	
			G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)	
			3,914.000000	5	
				Density	
				6.60	
				<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

Sec. 2	Was any of this waste managed on-site? (page 24)
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	3,914.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Cleanouts from Job 38

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:
 TE NAME: Pressure Chemical Co. Leland
 EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvent from polymerization; contains an olefin			
B. EPA Hazardous Waste Codes (page 22)		D001	NA	C. State Hazardous Waste Codes (page 22)	
NA		NA	NA		
D. Source Code (page 23)	G24	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)
Management Method Code for Source Code G25				<input type="checkbox"/> Yes	H. UOM (page 23) 5 Density 6.19 <input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24) <input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)
---------------	--

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26) <input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) SCD003351699	C. Off-site Management Method Code Shipped to (page 26) H050	D. Total quantity shipped in 2001 (page 26) 1,475.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26) WVD981107600	C. Off-site Management Method Code Shipped to (page 26) H061	D. Total quantity shipped in 2001 (page 26) 20.000000
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Distillate from Job 47. Process ran in 2000

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



FORM
GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Ignitable spent solvent from process cleanout; contains aliphatic alcohol				
B. EPA Hazardous Waste Codes (page 22)	D001	F003	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G13	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes		5
					Density 6.60
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)			
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	SCD003351699	H050	750.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments: Cleanout from Job 47; project cancelled in 2001

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

ITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvent from process distillation; contains aromatic hydrocarbon					
B. EPA Hazardous Waste Codes (page 22)		D001	F005	C. State Hazardous Waste Codes (page 22)			
NA		NA	NA				
D. Source Code (page 23)	G24	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)	
Management Method Code for Source Code G25					165.000000	5	
				<input type="checkbox"/> Yes	Density 7.25		
					<input checked="" type="checkbox"/> lbs/gal	<input type="checkbox"/> sg	

Sec. 2 Was any of this waste managed on-site? (page 24)

Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3 A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

Yes (CONTINUE TO BOX B) No (FORM IS COMPLETE)

Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) SCD003351699	C. Off-site Management Method Code Shipped to (page 26) H050	D. Total quantity shipped in 2001 (page 26) 165.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Process distillate from Job 48

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U.S. ENVIRONMENTAL PROTECTION AGENCY

TE NAME: Pressure Chemical Co. Leland

2001 Hazardous Waste Report

EPA ID NO: NCD091572073

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Ignitable spent solvent from polymer precipitation; contains hydrocarbons and				
B. EPA Hazardous Waste Codes (page 22)	D001	NA	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G07	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23) Density
Management Method Code for Source Code G25			<input type="checkbox"/> Yes		<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)			
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) SCD003351699	C. Off-site Management Method Code Shipped to (page 26) H050	D. Total quantity shipped in 2001 (page 26) 330.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments: Job 49-1 solvents from polymer precipitation

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

TE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Ignitable spent solvent and by-product from depolymerization process; contains				
B. EPA Hazardous Waste Codes (page 22)	F002	NA	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G07	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	28,128.000000	1 Density
					<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)	
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)
		Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	ARD069748192	H040	27,853.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

TE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvent from vessel cleanout; contains alcohols and hydrocarbons			
B. EPA Hazardous Waste Codes (page 22)		D001	F003	C. State Hazardous Waste Codes (page 22)	
NA		NA	NA		
D. Source Code (page 23)	G13	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	1,480.000000	5
					Density 5.99
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)			
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)				
<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)				
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	SCD003351699	H050	1,480.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments: Job 49 clean outs

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

FORM GM

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Ignitable solvent from catalyst process; contains aromatic chlorinated solvent				
B. EPA Hazardous Waste Codes (page 22)	F002	NA	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G11	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	150.000000	5
					Density 11.20
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2 Was any of this waste managed on-site? (page 24)

Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1	ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	On-site Management Method Code (page 24)
Quantity treated, disposed or recycled on-site in 2001 (page 25)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3 A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

Yes (CONTINUE TO BOX B) No (FORM IS COMPLETE)

Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 49-4 Off-spec catalyst solution

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

FORM GM

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable raw material unused; contains an olefin			
B. EPA Hazardous Waste Codes (page 22)		D001	NA	C. State Hazardous Waste Codes (page 22)	
		NA	NA		
D. Source Code (page 23)	G11	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	
Management Method Code for Source Code G25					
				G. Quantity Generated in 2001 (page 22)	H. UOM (page 23) Density
				10,400.000000	1
			<input type="checkbox"/> Yes		<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2		Was any of this waste managed on-site? (page 24)			
		<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
		<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2			
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)		

Sec. 3		A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
		<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)		
	OHD000816629	H050	10,400.000000		
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)		
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)		

Comments: Job 50 unused raw material. Project never run

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Aqueous layer from polymer solution washing; contains chlorinated solvent				
B. EPA Hazardous Waste Codes (page 22)	F002	NA	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G07	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	7,729.000000	5
					Density 8.35
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)			
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	NJD002385730	H081	7,629.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	SCD003351699	H050	100.000000	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments: Job 51 aqueous washes. also has zinc salts

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



**FORM
GM**

**U.S. ENVIRONMENTAL
PROTECTION AGENCY**

2001 Hazardous Waste Report

**WASTE GENERATION
AND MANAGEMENT**

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Spent Ignitable solvent from polymer preparation; contains chlorinated solvent			
B. EPA Hazardous Waste Codes (page 22)		F002	F003	C. State Hazardous Waste Codes (page 22)	
NA		NA	NA		
D. Source Code (page 23)	G08	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	3,578.000000	5
					Density 11.06
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2 Was any of this waste managed on-site? (page 24)

Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3 A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

Yes (CONTINUE TO BOX B) No (FORM IS COMPLETE)

Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) ARD069748192	C. Off-site Management Method Code Shipped to (page 26) H040	D. Total quantity shipped in 2001 (page 26) 3,578.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 51-2 Spent process liquors

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



**FORM
GM**

**U.S. ENVIRONMENTAL
PROTECTION AGENCY**

2001 Hazardous Waste Report

**WASTE GENERATION
AND MANAGEMENT**

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Ignitable spent solvent from vessel cleanout; contains alcohols and ketones				
B. EPA Hazardous Waste Codes (page 22)	D001	F003	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G13	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	1,470.000000	5
					Density 6.60
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1	ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	On-site Management Method Code (page 24)
Quantity treated, disposed or recycled on-site in 2001 (page 25)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	1,470.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 51-3 Cleaning solvents

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

ITE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Spent ignitable solvent from vessel cleaning; containing alcohol and amine				
B. EPA Hazardous Waste Codes (page 22)	D001	F003	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G13	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
				2,250.000000	5
Management Method Code for Source Code G25			<input type="checkbox"/> Yes		Density 6.60
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1	ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	On-site Management Method Code (page 24)
Quantity treated, disposed or recycled on-site in 2001 (page 25)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	2,250.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 53-1 cleaning solvent

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

TE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Spent ignitable solvent from product distillation; contains hydrocarbon				
B. EPA Hazardous Waste Codes (page 22)	D001	NA	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G24	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	1,300.000000	5
					Density 6.50
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2 Was any of this waste managed on-site? (page 24)

Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1	ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	On-site Management Method Code (page 24)
Quantity treated, disposed or recycled on-site in 2001 (page 25)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3 A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)

Yes (CONTINUE TO BOX B) No (FORM IS COMPLETE)

Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) SCD003351699	C. Off-site Management Method Code Shipped to (page 26) H050	D. Total quantity shipped in 2001 (page 26) 1,300.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 53-2 distillate

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

TE NAME: Pressure Chemical Co. Leland

FORM GM

EPA ID NO: NCD091572073

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Spent ignitable solvent from cellulose modification; contains hydrocarbons			
B. EPA Hazardous Waste Codes (page 22)		D001	NA	C. State Hazardous Waste Codes (page 22)	
NA		NA	NA		
D. Source Code (page 23)	G24	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	
Management Method Code for Source Code G25					
				G. Quantity Generated in 2001 (page 22)	100.000000
				H. UOM (page 23)	5
				Density	5.50
				<input type="checkbox"/> lbs/gal	<input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)	
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)
		Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	100.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 54 1st step still bottoms

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

Facility Name: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Spent ignitable solvents from clean out from pre-polymer filtration; contains				
B. EPA Hazardous Waste Codes (page 22)	D001	F003	C. State Hazardous Waste Codes (page 22)		
	NA	NA			
D. Source Code (page 23)	G13	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
				1,315.000000	5
Management Method Code for Source Code G25			<input type="checkbox"/> Yes		Density 6.60
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)	
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD003351699	H050	1,265.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	SCD036275626	H050	50.000000
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 55 Clean out solvents from pre-polymer mixture

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

TE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1		A. Waste Description (page 22) Ignitable spent solvent from purification of flavor; contains hydrocarbon and			
B. EPA Hazardous Waste Codes (page 22)		D001	NA	C. State Hazardous Waste Codes (page 22)	
NA		NA	NA		
D. Source Code (page 23)	G08	E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)	
Management Method Code for Source Code G25					
				G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
				1,035.000000	5
					Density
					7.30
			<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)			
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	SCD003351699	H050	350.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	WVD981107600	H141	555.000000	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments: Job 57 Process liquors

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

TE NAME: Pressure Chemical Co. Leland

EPA ID NO: NCD091572073



U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Spent ignitable solvent emulsion; contains aromatic solvent and epi-Chlorohydrin				
B. EPA Hazardous Waste Codes (page 22)	D001	F005	C. State Hazardous Waste Codes (page 22)		
	U041	NA	NA		
D. Source Code (page 23)	G07	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
				300.000000	5
Management Method Code for Source Code G25			<input type="checkbox"/> Yes		Density 7.20
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1	ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	On-site Management Method Code (page 24)
Quantity treated, disposed or recycled on-site in 2001 (page 25)	Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
	<input type="checkbox"/> Yes (CONTINUE TO BOX B) <input checked="" type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Job 60 solvent epichlorohydrin emulsion layers

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:



U.S. ENVIRONMENTAL PROTECTION AGENCY

TE NAME: Pressure Chemical Co. Leland

2001 Hazardous Waste Report

EPA ID NO: NCD091572073

FORM GM

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Spent vacuum pump oil and entrapped ignitable solvents				
B. EPA Hazardous Waste Codes (page 22)	D001	F002	C. State Hazardous Waste Codes (page 22)		
	F003	F005	U041		
D. Source Code (page 23)	G09	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25			<input type="checkbox"/> Yes	5,953.000000	5
					Density 8.00
					<input checked="" type="checkbox"/> lbs/gal <input type="checkbox"/> sg

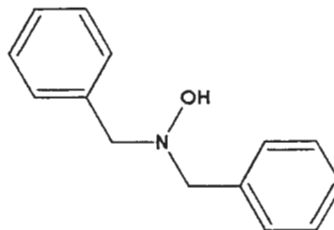
Sec. 2	Was any of this waste managed on-site? (page 24)			
	<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
	<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
	<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
	SCD003351699	H050	4,853.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

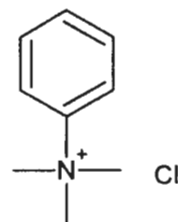
Comments: This is the vacuum pump generated and shipped during 2001. Sored as non-hazardous, then shipped under waste codes coming from the active processes.

**Chemicals Manufactured at Pressure Chemical Co.
Specialty Chemical Division**

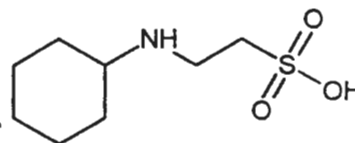
Name: Dibenzylhydroxylamine (DBHA)
Structure: $(C_6H_5CH_2)_2NOH$
CAS#: 621-07-8



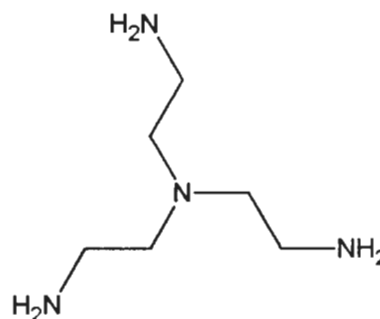
Name: Phenyltrimethylammonium chloride (PTAC)
Structure: $C_6H_5N(CH_3)_3Cl$
CAS#: 138-24-9



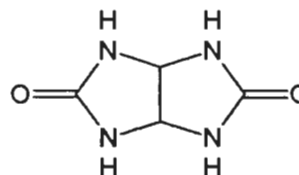
Name: Sodium cyclohexyltaurate (SCT)
Structure: $C_6H_{11}NHCH_2CH_2SO_3H$
CAS#: 3076-05-9

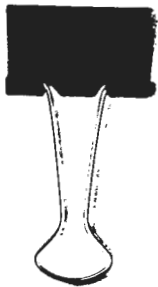


Name: Tris(2-aminoethyl)amine
Structure: $N(CH_2CH_2NH_2)_3$
CAS#: 4097-89-6



Name: Acetylenediureine (R-220)
Structure: $C_4H_6N_4O_2$
CAS#: 496-46-8





ORDER ROUTING - ENFORCEMENT

Company Name: Pressure Chemical Company

EPA ID #: NCD091572073 Site Location: Belmont

Action Type: Standard Order w/ Penalty

Inspector: Betty Helms Order Developed by: _____

Date Sent to Programs Branch: 12-11-02 Date Received: _____

INSPECTION DATE	TARGET DATE
<u>10-30-02</u>	<u>4-30-03</u>

ORDER REVIEW

Name	Date Sent	Date Due	Date Returned

Attachments: Inspection Report Penalty Comp. Worksheet
 EPA Inspection Report Analyses
 Investigation Report Photos
 Penalty Checklist Disk

Comments: History notes / Reports

cc: E/W/RI Supervisor Shita Wiliford WMS Betty Helms

Subject: Waste Codes

Date: Mon, 25 Nov 2002 09:19:23 +0000

From: Robert Nelms <Robert.Nelms@NCmail.net>

To: twilliams@presschem.com

CC: mikewilliford <mike.williford@ncmail.net>

Tim,

Thank you so much for getting the waste codes to me. I know it was a bit of additional aggravation on top of all of your other duties.

Do you have any waste analysis for the filter pads and the WWTP sludge? Because we said it was waste during the inspection, I will write the report to reflect that it is waste. During the meetings we will have after the compliance order comes out you may present the analysis that you have supporting that these items are not waste.

Once again thank you for your time and please call me if you have any questions.

Bobby Nelms
Waste Management Specialist
Hazardous Waste Section

Subject: Waste Codes

Date: Mon, 25 Nov 2002 09:19:23 +0000

From: Robert Nelms <Robert.Nelms@NCmail.net>

To: twilliams@presschem.com

CC: mikewilliford <mike.williford@ncmail.net>



Tim,

Thank you so much for getting the waste codes to me. I know it was a bit of additional aggravation on top of all of your other duties.

Do you have any waste analysis for the filter pads and the WWTP sludge? Because we said it was waste during the inspection, I will write the report to reflect that it is waste. During the meetings we will have after the compliance order comes out you may present the analysis that you have supporting that these items are not waste.

Once again thank you for your time and please call me if you have any questions.

Bobby Nelms
Waste Management Specialist
Hazardous Waste Section

Hazardous Waste
NOTICE OF VIOLATION

To: CT SPECIALTIES CORP.
Address: P.O. Box 130
LELAND, N.C. 28451
EPA ID# NCD 091 572 073

Docket # 95-614
Inspection Date 08-08-95
Facility Type LQ6

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 8/8, 1995, L.F. WORRELL representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

- | Citation | Specifics |
|-------------------------|--|
| <u>262.34(a)(1)(ii)</u> | <u>Subpart J of 40 CFR 265.190 - 265.201</u>
<u>CT Specialties has started using a materials storage tank for a hazardous waste storage tank. C Spent non-halogenated solvents including methanol and ethanol.</u>
<u>CT Specialties must comply with Subpart J.</u> |
| <u>262.34(a)(2)</u> | <u>hazardous waste containers must be marked with dates of accumulation.</u> |
| <u>262.34(a)(3)</u> | <u>hazardous waste containers must be marked "hazardous waste" or similar marking.</u> |
| <u>262.34(a)(4)</u> | <u>265.16(c) - employees in the hazardous waste program must have an annual training update.</u> |

You are hereby required to comply with the noted violation(s) by September 30th, 1995, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

8-18-95
(Date)

L.F. WORRELL WMS
N.C. Hazardous Waste Section

I, L.F. Worrell, hereby certify that I have personally ^{mailed} served a copy of this Notice on:

CT SPECIALTIES CORP.

at P.O. Box 130 Leland N.C. 28451

on 8-18-95, 1995.

(Location)

(Recipient Signature)

copies to: field files
central files
Regional Manager

RCRA INSPECTION REPORT

X = violation noted; NA = not applicable

Facility Name: C.T. Specialties Corporation formerly NATIONAL STARCH & CHEMICAL CORP.
Location: Hwy 74/76 East of Wilmington
Mailing Address: P.O. Box 130 Leland N.C. 28451
ID #: NCD 091 572 073. Phone number: 910-371-2234
Contact/Title: Melvin E. Miller
Inspection Date: 8-8-95 Last Inspection: 1994
Status: LOG Type of Inspection: CEI
Inspector(s): L.F. WOLKOFF Waste mgmt Specialist
Present at Inspection: Melvin E. Miller
Type of business: Chemical manufact.
Wastes Generated: Spent non-halogenated solvent including Methanol and Ethanol

Manifests:

Approved transporters? Approved TSD's?
Signed Copies? Filled out correctly?
LDR notification attached?
Olefin Corp. NCD0007 73655 TT 6500g. Dual Fee 3 fees

Waste Minimization: NO written plan follows National's old plan

Inspection Records:

Evidence that inspections are conducted *LANK inspections Not done

Contingency Plan:

On site?
Any changes to facility/processes or Emergency coordinator since last review? yes
Contingency plan implemented? (if yes, was it adequate?)
yes

Training Records:

Certified training documents available? _____
Any new employees since last review? _____
Evidence of improper/inadequate training?
no annual update

Facility Name: C.T. Specialties formerly National Starch
ID #: NC 091 572 073 0 Inspection Date: 8-8-95

Employee interviews:

Name(s) Dropped after new ownership. Trained? X Training Program

Annual Report submitted? /

Emergency preparedness:

- *Facility maintained and operated to prevent releases? ✓
- Internal communications or alarm present? ✓
- Device in area of operation to summon outside aid? ✓
- Portable fire extinguishers and/or fire control equipment? ✓
- Spill control equipment? ✓
- Adequate water volume, foam equipment, or auto sprinklers? ✓
- All equipment/alarms tested and maintained? ✓
- All personnel handling HW have access to alarm/device? ✓
- *Aisle space in areas of facility operation? ✓

Agreements with Emergency Responders? New ownership submit needs to update contingency plans and submit to four agencies - see violations

Satellite Accumulation Area(s): Location(s): potential of each process areas @ Storage Tanks

Containers: closed? ✓
labeled? X
< 55 gallons? ✓

Storage Areas: Description: Lane farm Area across

Containers: closed? ✓ aisle space? ✓
labeled? X evidence of release? ✓
dated? X < 90 days? ✓
good condition? X

Other HW units: (applicable regulations)
Description of unit: X None, two hazardous waste tanks Non Compliance with Subpart T.

External facility condition: Shut down due to a cleanup due to a fire.

Site Deficiencies:

262.34 (a) (1)(i) Subpart J of 40 CFR 265.190, - 265.201
CT Specialties has started using a product tank for a hazardous waste storage tank. (Spent non-halogenated solvents including methanol and ethanol.)

262.34(a)(2)
CT Specialties had containers of hazardous waste with out dates of accumulation from their file

262.34(a)(3)
CTS containers without identification

262.34(a)(4) - 265.16(c)
annual Review of hazardous waste training

A.P. Woodell
Inspector/Reviewer

8-8-95
Date

MELVIN MILLER
Facility Contact

COMPLAINT INVESTIGATION (cont.)

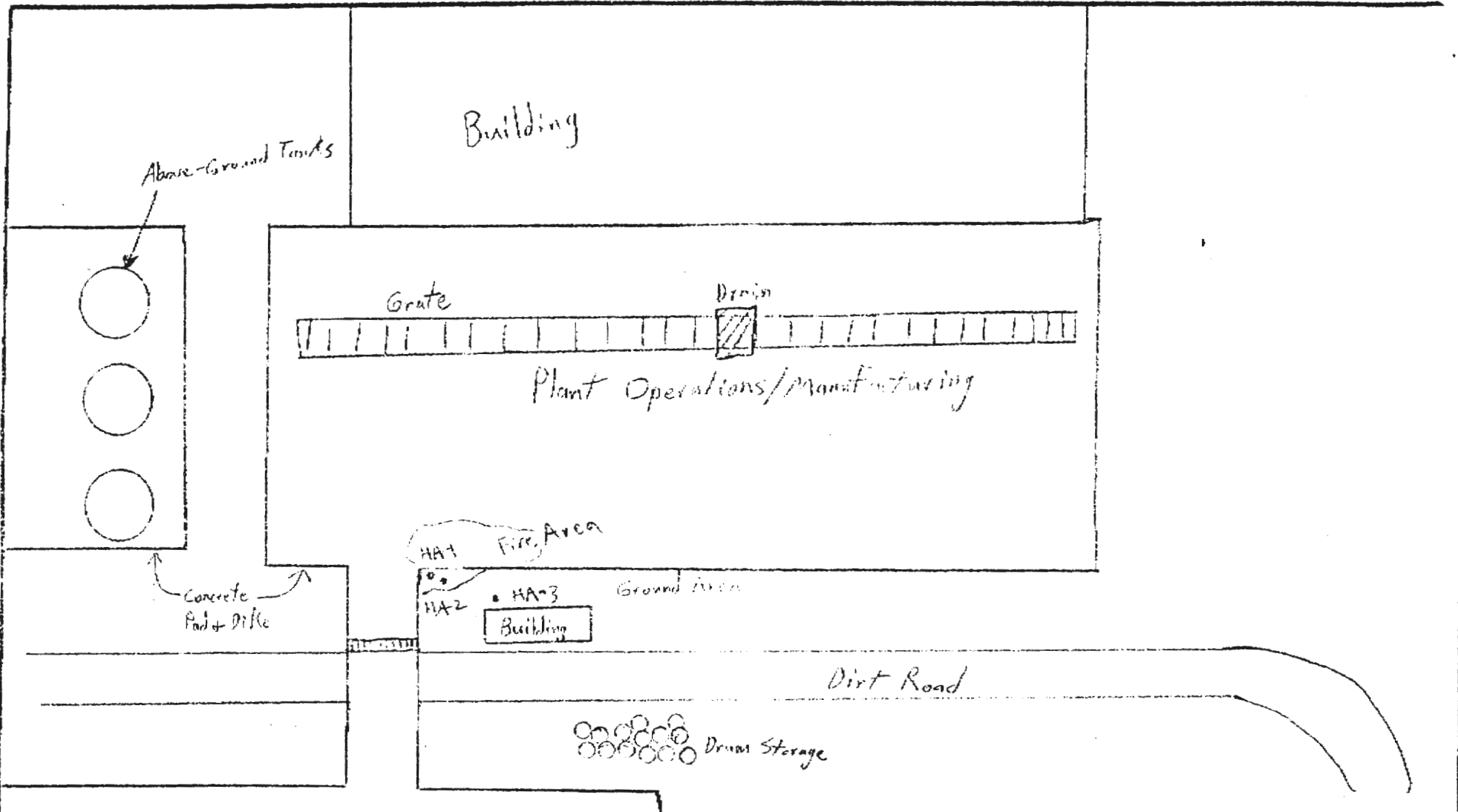
Sheet 1 of 1

PROJECT: C.T. Specialties, Inc. - Chemical Fire

DATE: 8/4/95

after the fire, their water was affected from the fire area up to the office. He is uncertain how the contamination got into the line. He suggested that perhaps during the fire fighting, a water hose was left in the spill area and due to back suction after pumping was completed, it may have sucked some of the contaminated water back into the line. However, he is uncertain how it actually occurred. I asked if he had tested the drinking water at the office. Mr. Miller said that their lab had run a sample for a qualitative analysis and found that the water has tetradecanol in it. They are flushing the lines to the treatment system. He said that no one is drinking the water at the plant.

Due to the amount of drummed chemical storage, I am referring this incident to Bobby Nelms of Solid and Hazardous Waste. I am also referring the incident to Eric Inhoff of Public Water due to the apparent impact to their water line. Mr. Miller stated that he expects to be hooked up to the county industrial park water and sewer service as it is completed in late 1995.



C.T. Specialties - Chemical Fire (8-1-95)

SCALE: NTS	APPROVED BY	DRAWN BY BRP
DATE: 8-4-95		
		DRAWING NUMBER
		950807-01-MBRP

Region IV CMC Form - Side A

EPA ID: MC D 091572073

DATA ENTRY PERSONNEL
Submitted by: _____ Date: _____
Entered by: _____ Date: _____

CSE

Facility Name: C.T. Specialties Corp. City: Leland

EVALUATION DATA: New: _____ Change: _____ Delete: _____ (_____ : Required)

Agency: 6 Date: Mo 10, Day 04, Year 95 Type: _____
Person: 009 BRANCH HW REASON _____
Control Number Data Entry Personnel

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applicable D: Del.)

Generators		Transporters		TSD's					
GBF	<input checked="" type="checkbox"/>	TGR	<input type="checkbox"/>	DFF	<input type="checkbox"/>	DLD	<input type="checkbox"/>	DPS	<input type="checkbox"/>
GER	<input checked="" type="checkbox"/>	TMR	<input type="checkbox"/>	DCH	<input type="checkbox"/>	DLE	<input type="checkbox"/>	DPI	<input type="checkbox"/>
GCR	<input type="checkbox"/>	TOR	<input type="checkbox"/>	DCL	<input type="checkbox"/>	DLC	<input type="checkbox"/>	DRI	<input type="checkbox"/>
GLB	<input type="checkbox"/>	TWR	<input type="checkbox"/>	DCE	<input type="checkbox"/>	DHC	<input type="checkbox"/>	DTT	<input type="checkbox"/>
GMR	<input type="checkbox"/>	TWD	<input type="checkbox"/>	DCR	<input type="checkbox"/>	DHR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
GOR	<input type="checkbox"/>			DGS	<input type="checkbox"/>	DOR	<input type="checkbox"/>		
GPT	<input type="checkbox"/>			DGH	<input type="checkbox"/>	DOT	<input type="checkbox"/>		
GRR	<input type="checkbox"/>			DIN	<input type="checkbox"/>				
GSC	<input type="checkbox"/>								
GSO	<input type="checkbox"/>								

COMPLIANCE SCHEDULE (TSD, GEN, TRANS.)
FEA CAS

Evaluation Comment: (72) 1
2

VIOLATION DATA: New: _____ Change: _____ Delete: _____

- Agency: Type: Date (dd/mm/yy): / / Class:
Priority: Branch: Person: Reg. Number (Data Entry):
Return to Compliance: Scheduled Actual
Reg. Type: Reg. Description (30): _____
Comment (72): _____
- Agency: Type: Date (dd/mm/yy): / / Class:
Priority: Branch: Person: Reg. Number (Data Entry):
Return to Compliance: Scheduled Actual
Reg. Type: Reg. Description (30): _____
Comment (72): _____
- Agency: Type: Date (dd/mm/yy): / / Class:
Priority: Branch: Person: Reg. Number (Data Entry):
Return to Compliance: Scheduled Actual
Reg. Type: Reg. Description (30): _____
Comment (72): _____

Continue violation data if necessary -

NOTICE OF VIOLATION

CT SPECIALTIES CORP.
Address: P.O. Box 130
LELAND, N.C. 28451
ID# NCD 091 572 073

Docket # 95-614
Inspection Date 08-08-95
Facility Type LQ6

December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 130 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

8/8, 1995, L.F. WORRELL representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

- | <u>Citation</u> | <u>Specifics</u> |
|---|--|
| <u>62.34(a)(1)(ii)</u> | <u>Subpart J of 40 CFR 265.190 - 265.201</u> |
| <u>Assessment (?)</u> | <u>CT Specialties has started using a materials storage tank for a hazardous waste storage tank. (Spent non-halogenated solvents including methanol and ethanol.</u> |
| <u>Not used for tanks until they can comply</u> | <u>CT Specialties must comply with Subpart J.</u> |
| <u>262.34(a)(2)</u> | <u>hazardous waste containers must be marked with dates of accumulation.</u> |
| <u>262.34(a)(3)</u> | <u>hazardous waste containers must be marked "hazardous waste" or similar marking.</u> |
| <u>262.34(a)(4)</u> | <u>265.16(c) - employees in the hazardous waste program must have an annual training update.</u> |

You are hereby required to comply with the noted violation(s) by September 30th, 1995, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

8-18-95
(Date)
I, L.F. Worrell, hereby certify that I have personally mailed served a copy of this Notice on:
CT SPECIALTIES CORP. at P.O. Box 130 Leland N.C. 28451
(Name) (Location)
on 8-18-95, 1995.
(Recipient Signature)

copies to: field files
central files
Regional Manager
CSE done 10/04/95

Hazardous Waste Operations and Emergency Response (HAZWOPER) Training

Date Conducted: 8/24/95

Trainer: Peter H. Thompson

Trainees: See Attached List

Training Materials Used: JJ Keller Training Program:

- In Plant Emergency Response
- Personal Protective Equipment
- Decontamination Procedures
- Hazardous Waste

Summary of Training: This training was conducted in partial fulfillment of the requirements of HAZWOPER (29 CFR 1910.120). Training was based upon the JJ Keller Videos which were shown and discussed. Production employees of CT Specialties act as *First Responders* to spills of hazardous substances. Based upon this training, the employees are trained to the *First Responder Awareness Level* as defined by OSHA. Following further training, including table top spill drills and hands on exercises, the employees will be rated at the *First Responder Operations Level* as defined by OSHA. CT Specialties relies upon the Local Fire Department for all other HAZWOPER-covered response.

Attached is a summary of each training section. The actual training materials are available at the administrative offices of CT Specialties.

RCRA INSPECTION REPORT

FACILITY NAME: CT Specialties Corp. formerly Natural Spaech

ID Number: NCD 091 572 073

Type of facility: LQG

Ownership: CT Specialties Corp. Inc.

Contact: Marvin Miller

Phone number: 910 / 371-2234

Facility location (address): 2271 Andrew Jackson Highway

City, State, Zip: Leland, N.C. 28451

SURVEY PARTICIPANTS:

Marvin Miller

LF Worrell

Bill Coyle - keeps insp. Records

DATE OF INSPECTION:

7-8-97

PURPOSE OF INSPECTION:

CET

FACILITY DESCRIPTION:

HMB - body builders

Processes:

Simple distillation
sterilization
hydrogenation

blending tanks

WWT System Spray irrigation to POTW

Type Waste:

D039 Perchloroethylene

D001, F003, F005 Solvent Methanol

D001, Waste heptane

D001/D022 Diacetone Alcohol

Transporters:

S.J. Transportation Co. NJD 071 629 976

OMNI Transp. SCR 006 002 964

TSD's:

E.I. DuPont De Nemours Co.

NJD 002385730

Southeastern Chemicals SCD 036 275 620

Prelawson Chemical Co VAD 003 111 416

MEM Chemical & Equipment

ALD 070 513 767

Facility Name: CT Specialties

ID#: NCD 091 572073

Accumulation Areas:

at process tanks

Storage Areas:

tanks & containers

WASTE MINIMIZATION:

Not documented

SITE DEFICIENCIES:

RECOMMENDATIONS:


Inspector/Reviewer


Facility Contact

7-8-97
Date

COMPLIANCE Y/N

Date: 7-8-97

Inspector# 009

GENERATOR SURVEY

Name: CT Specialties Corp.
Address: 2271 Andrew Jackson Highway
Leland N.C. 28451
EPA ID# NCD 091 572 073

Type: LOG/SQG.
Sector: Chemical Manufact.
New-Notifier Y/N
SIC 2869

Inspected Before? Y/N

Received Compliance Assistance? Y/N

Compliance Assistance in the form of? HWS Course ✓ When _____ How many _____
or, Contractor, On-site, Phone, Other FRO

How was information /assistance used:

Notification: Y/N (i.e., did they notify as result of this CA?)
Regulatory: Y/N (i.e., waste management changes due to CA?)
Emissions/Discharges: Y/N (i.e., actual reduction, elimination or proper management of waste as the result of CA?)
If yes, list type of waste and volume(s) _____ / _____
_____ / _____
_____ / _____

Have you ever requested Compliance Assistance from this agency under the "Policy on Compliance Assistance for Small Business? Y/N

If not in Compliance, why? _____

Top management commitment to compliance/waste minimization? Y/N

Any community based outreach efforts conducted? Y/N If yes, what? Responsible Care program - local concerns

State of North Carolina
 Department of Environment, Health and Natural Resources
 Division of Waste Management
 Hazardous Waste Section

SITE SAFETY PLAN
 (HWS-SSP)

Facility Name: CT Specialties Corp. EPA#: NCD 091 572 073
 Address: 2271 Andrew Jackson Highway Phone# 910/371-2234
Iceland, N.C. 28451
 Client Name: CT Specialties Phone# 910/371-2234
 Facility Contact: Marvin Miller Phone# _____
 Health/Safety Contact: M. Miller Phone# _____
 SSP Prepared/Reviewed By: F. Worek Date(s): 7-8-97

B. PROJECT DESCRIPTION

X	TYPE	DATE	X	ACTIVITY	DATE
	C M E			INSPECTION	
X	C E I			DRUM/SLUDGE SAMPLING	
	C D I			SOIL/SEDIMENT SAMPLING	
	R F I			GROUNDWATER SAMPLING	
	R F A			SURFACE WATER SAMPLING	
	O & M			AIR SAMPLING	
	SITE INVESTIGATION/ VISIT			OTHER:	
	TECHNICAL ASSISTANCE				

Project Activity Summary: Record Review
visit -> 1 accumulation areas
2 storage areas
3 tank farm

(C) EMERGENCY INFORMATION

Ambulance: Brunswick Co. EMS Telephone# 911
 Hospital: Cape Fear Regional Telephone# 911
 Police: Iceland PD Telephone# 911
 Fire Department: Iceland VFD Telephone# 911
 Fire and Emergency Signals reviewed: ✓
 Site Evacuation plan reviewed: YES ✓

(D) FACILITY DESCRIPTION

Manufacturing Process Description: Chemical manuf. Company
manuf HMB - body building protein's
Publ - Suntanning lotion

Site Topography:

Mountains ___ Rivers ___ Valley ___ Level ___ Slopes ___ Urban ___ Facility ___ Other ___
 Special Access Requirements: None

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

To: MELVIN MILLER - CT SPECIALTIES CORP.
Address: 2271 ANDREW JACKSON HIGHWAY
LELAND, N.C. 28451
EPA ID# NCD 091 572 073

Docket # 98-246
Inspection Date 08-24-98
Facility Type LOG

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 08-24, 1998, L.F. WORRELL representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Citation	Specifics
<u>40 CFR 262.34</u>	<u>265.16(c) Facility personnel must take part in an annual review of the initial training required in paragraph (c) of this section.</u>
	<u>265.16(d) (1) documentation of the job title for each position at the facility related to hazardous waste management...</u>
	<u>(2) A written job description for each position under paragraph (d) (1) of this section. ... see attachment</u>

You are hereby required to comply with the noted violation(s) by Sept. 9, 1998, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

8-28-98 (Date) L.F. WORRELL N.C. Hazardous Waste Section

I, A.L. Wanda, hereby certify that I have personally served a copy of this Notice on: CT SPECIALTIES CORP at 2271 ANDREW JACKSON HIGHWAY, LELAND, N.C. on _____, 19____. (Recipient Signature)

copies to: field files
central files
Regional Manager

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

To: MELVIN MILLER - CT SPECIALTIES CORP.
Address: 2271 ANDREW JACKSON HIGHWAY
LELAND, N.C. 28451
EPA ID# NCD 091 572 073

Docket # 98-246
Inspection Date 08-24-98
Facility Type LQG

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

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	<u>265.16(d) (1) documentation of the job title for each position at the facility related to hazardous waste management...</u>
	<u>(2) A written job description for each position under paragraph(d)(1) of this section. ... see attachment</u>

You are hereby required to comply with the noted violation(s) by Sept. 9, 1998, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

8-28-98
(Date)

L.F. WORRELL
N.C. Hazardous Waste Section

I, A.G. Wanda,
CT SPECIALTIES CORP
(Name)

at 2271 ANDREW JACKSON HIGHWAY, LELAND, N.C.
(Location)

on _____, 19__.

(Recipient Signature)

copies to: field files
central files
Regional Manager

FACILITY INFORMATION:	Submittal Information	Initial Date -	Corrected Date -
	By-	Date -	By- Date -
EPA ID Number: <u>MCD091572073</u>	RCRA Comp. Section:	___/___/___	___/___/___
	Received:	___/___/___	___/___/___
	Entered/Returned:	___/___/___	___/___/___

Facility Name: CT SPECIALTIES CORP. City: _____

EVALUATION DATA: New: ___ Change: ___ Delete: ___ (___ : Required)

Agency: S Date: 09/28/98 Type: CSIE Control Number Data Entry Personnel: _____

Person: 009 Reason: 011

Evaluation Comments:
 (74) 1 : _____
 2 : _____

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) Date of determination:
 - a SNC (SNY evaluation) _____
 or - no longer a SNC (SNN eval.) Same as above eval.: ___/___/___

VIOLATION DATA: New: ___ Change: ___ Delete: ___

1 Agency: S Type: 1210 Date (mdy) Determined: 08/24/98 Class: 4
 Priority: 2 Branch: HW Person: 009 Seq. Number (Data Entry): _____
 Return to Compliance: 09/09/98 --- Scheduled --- --- Actual ---
 Reg. Type: SIR Reg. Description (30): 265.16(c) 09/28/98
 Comment (72): _____

2 Agency: S Type: 1210 Date (mdy) Determined: 08/24/98 Class:
 Priority: 2 Branch: HW Person: 009 Seq. Number (Data Entry): _____
 Return to Compliance: 09/09/98 --- Scheduled --- --- Actual ---
 Reg. Type: SIR Reg. Description (30): 265.16(a)(1) 09/28/98
 Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry): _____
 Return to Compliance: / / --- Scheduled --- --- Actual ---
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: Change: Delete: (: Required)

Agency: Type: Date: / / Month Day Year Seq.# (Data Entry)

Person: Branch: Poll. Prev. Measures:

Penalty Data Proposed: \$ / / 1) Payments: \$ / / Date Paid: / /

Settled/Final: \$ / / 2) \$ / /

Enforcement Comments: 1: _____ (74)

2: _____

Cite violations addressed by this action below -

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class: Seq. (Data Entry) Number

Priority: Branch: Person:

Return to Compliance: / / -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class: Seq. (Data Entry) Number

Priority: Branch: Person:

Return to Compliance: / / -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class: Seq. (Data Entry) Number

Priority: Branch: Person:

Return to Compliance: / / -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class: Seq. (Data Entry) Number

Priority: Branch: Person:

Return to Compliance: / / -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

More violations for this enforcement action on other side ? Yes No


```

*****
*                               RCRIS: CM & E Evaluation Add/Update Screen 2                               *
*****
* Handler ID: NCD091572073   Name: CT SPECIALTIES CORP                                           *
* Location St: 2271 ANDREW JACKSON HWY NE   City: LELAND                                         *
*****
* Evaluation Control Number: 19980824014                                                         *
* Responsible Agency: S                                                                 *
* Date of Evaluation(MMDDYY): 082498                                                         *
*
* Please Enter The Following Evaluation Information:                                             *
* Resp. Branch: 07                                                                 *
* Resp. Person: NC 009                                                                 *
* Type of Evaluation: CEI                                                                 *
* Reason of Evaluation:                                                                 *
*
* Evaluation Comment:                                                                 *
* NOV 98-246                                                                 *
*
*****
* ENTER-Save           F2-Cancel           F3-Exit           F4-ID Screen           *
* F5-Cov. Areas        F8-Help            F11-Viol           F12-Link              *
*****

```

Flint
NEED A Follow up ON THIS

CSE

Jim

*I personally did not
 send in CSE cover sheet.
 Jm*

RE
 NOV 10 1998
 DEPT. OF CORRECTIONS
 WASHINGTON, D.C. 20004

Solid Waste Management Division
Hazardous Waste Section

SEP 02 1998

DIVISION OF WASTE MANAGEMENT
FAYETTEVILLE REGIONAL OFFICE

NOTICE OF VIOLATION

To: MELVIN MILLER - CT SPECIALTIES CORP.
Address: 2271 ANDREW JACKSON HIGHWAY /
LELAND, N.C. 28451
EPA ID# NCD 091 572 073

Docket # 98-246
Inspection Date 08-24-98
Facility Type LQG

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 08-24, 1998, L.F. WORRELL representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Citation	Specifics
<u>40 CFR 262.34</u>	<u>265.16(c) Facility personnel must take part in an annual review of the initial training required in paragraph (c) of this section.</u>
	✓
	<u>265.16(d) (1) documentation of the job title for each position at the facility related to hazardous waste management ...</u>
	✓
	<u>(2) A written job description for each position under paragraph (d) (1) of this section. ... see attachment</u>
	✓
	<u>9-28-98 Incompliance JW</u>

You are hereby required to comply with the noted violation(s) by Sept. 9, 1998, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

8-28-98
(Date)

L.F. WORRELL
N.C. Hazardous Waste Section

I, A.L. Wanda, hereby certify that I have personally served a copy of this Notice on:

CT SPECIALTIES CORP at 2271 ANDREW JACKSON HIGHWAY, LELAND, N.C.
(Name) (Location)

on _____, 19__.

[Signature]
(Recipient Signature)

copies to: field files
central files
Regional Manager



STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT, AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

COMPLIANCE INSPECTION

05.23.00
CEI
LQG
BRUNSWICK CO.

Facility Name: C.T. SPECIALTIES CORP.

EPA ID: NCD 091 572 073

Contact: ALAN C. STOUT PLANT MGR 910.371.2234
BILL COYLE - OPERATOR

Address: 2271 ANDREW JACKSON HWY NE HWY 74/76
LELAND NC 28451

Status: LQG

Ownership: CT SPEC. CORP INC.

Facility Description: CTS IS A SPECIALTY CHEMICAL MANUFACTURING
THEY MANUF. CHEMICALS FOR EXXON, DUPONT & WALCO
including Chem for SCRUBBER & Sulfox-compound, plastic-
for DUPONT and DBHA antioxidant to keep sprays materials
white. CTS IS NOW ON THE POTW fee for THE INDUS. PARK
NO LONGER USES THEIR NPDES.

Waste Generation Processes: Non Regulated Waste Water -
D001 WASTE ISOPROPANOL
D001/F003 WASTE METHANOL
D001/F003 WASTE METH. TOLUENE
D038 WASTE WATER
D022 Sodium Hydroxide
D022/024/026 Nickel Oxide

Waste Types: D001, F003, D038, D022, _____
_____, _____, _____, _____

Facility Name: CT SPECIALTIES CORP ID# NCD 091 572 073 Pg. 2

Transporters: HAZMAT ENVIRONMENTAL GROUP NYD 980 769 947

TSD#: TRI-STATE MURR. MDD 095 038 998

GIANT CEMENT CO. SCU 003 351 649

MICHIGAN DISPOSAL MID 007072 831

TSDF: E I DUPONT NJD 002 385 730

TRANSPORTERS: ENSCO INC. ABD 069 748 192

FREEHOLD CARTAGE NJD 054-125 164

Accumulation Areas: @ END OF LINE PROCESS - WHEN EMPTYING TANKS

Storage Areas: @ STORAGE PAD
in CONTAINERS

Waste Minimization: YES - REUSE DISTILLATE
DEPENDS ON CUSTOMERS - NEEDS AND CONDITIONS OF WASTE WHAT
TO DO WITH WASTE.

Deficiencies: NONE OBSERVED

Recommendations:

Waste Management Specialist: FLETT WURRELL

Facility Contact: BILL COYLE

Date: 05.23.00

FACILITY INFORMATION: EPA ID Number: <u>MCID0911572073</u>	Submittal Information	Initial By- _____ Date - ____/____/____	Corrected By- _____ Date - ____/____/____
	RCRA Comp. Section:	_____	_____
	Received:	_____	_____
	Entered/Returned:	_____	_____

Facility Name: CT SPECIALTIES CORP. City: LELAND, NC 28451

EVALUATION DATA: New: _____ Change: _____ Delete: _____ (_____ : Required)

Agency: 5 Date: 110/24/01 Type: CIEI Control Number _____
Data Entry Personnel _____

Person: 0109 Reason:

Evaluation Comments:
(74) 1 : _____
2 : _____

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) Date of determination:
- a SNC (SNY evaluation) _____
or - no longer a SNC (SNN eval.) Same as above eval.: - or - _____/_____/____

VIOLATION DATA: New: _____ Change: _____ Delete: _____

_____ Agency: Type: Date (mdy) Determined: /_____/____ Class:
Priority: Branch: Person: Seq. Number (Data Entry) _____
Return to Compliance: /_____/____ --- Scheduled --- --- Actual ---
Reg. Type: Reg. Description (30): _____

Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: /_____/____ Class:
Priority: Branch: Person: Seq. Number (Data Entry) _____
Return to Compliance: /_____/____ --- Scheduled --- --- Actual ---
Reg. Type: Reg. Description (30): _____

Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: /_____/____ Class:
Priority: Branch: Person: Seq. Number (Data Entry) _____
Return to Compliance: /_____/____ --- Scheduled --- --- Actual ---
Reg. Type: Reg. Description (30): _____

Comment (72): _____

DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

COMPLIANCE INSPECTION

Facility Name: CT SPECIALTIES CORP. BRUNSWICK CC.
EPA ID: NCD 091 572 073 FORMERLY NATIONAL STARCH AND CHEMICAL COMPANY/
Contact: TOM KUNTZ - PROJECT MGR
Address: 2271 ANDREW JACKSON HWY NE
LELAND, N.C. 28451
Status: LQG
Ownership: CT SPECIALTIES CORP
Facility Description: CT Specialties Corp formerly National Starch and Chemical Corp- is located on Highway 7A West of Wilmington N.C. The company manufactures bulk pharmaceuticals, PABA, Benzocaine and specialty chemicals and provides custom manufacturing of chemicals for others. POTW pretreatment and Stormwater permits
LAST CEI 05.23.00
Waste Generation Processes: _____
Waste Isopropanol
Waste methanol, fulmer
Waste Waxes DC38
Waste Sodium hydroxide
Nickel oxide
Waste Types: D001, F003, D038, D022, _____
_____, _____, _____, _____, _____

Facility Name: CT SPECIALTIES CORP. ID#: NCD 091 572 073

Transporters: METROPOLITAN ENV. INT 190 010 397 VANWALTERS
FREEMAN CARTAGE INC NJD 054 126 160 6AD 980 845 677
ENSCO ARP 069 748 192 TRI STATE MLD 095 630 998

TSDF: DUPONT NJD 002 385 730 SOUTHEASTERN CHEM
ENSCO ARP 069 748 192 SCD 036 275 626
GIANT CEMENT SCD 003 351 649
SPRING CR OHIO 000 916 626

Accumulation Areas: @ 90 DAY STORAGE PAD

Storage Areas: CONCRETE PAD WITH CURBING TO DRAIN
NO ROOF

Waste Minimization: NO ALARM USES RADIOS, PHONES and TWO MAN RULE
WHEN INSPECTING OR MOVING WASTE @ S. PAD

Waste Minimization: WRITTEN PLAN
RE USES CHEMICALS, RERUNS

Deficiencies: NONE OBSERVED

Recommendations: REMOVE LABELS FROM EMPTY CONTAINERS
CHANGES NAMES OUT IN CONTINGENCY PLAN - STILL LIST FORMER
EMPLOYEES.
IN 90 DAYS STORAGE, LABELS SHOULD HAVE ASILES

Waste Management Specialist: LF WIRELL

Facility Contact: TOM KUNTZ

Date: 10.24.01