





RCRA REPORT

1) Facility Name: ARDEN SERVICES Inc

ID Number: NA

Type of facility:

Ownership: ~~Private~~ Corporate

Contact: Tim Dover

Phone Number: 687 9393

Facility Location (address): 345 Airport Rd

City, State, Zip: Arden NC 28704

2) Survey Participants:

R Puettell  
Mike Torrey  
William Graham

3) Date of Inspection: 3-20-95

4) Purpose of Inspection:

To split samples to determine if H.W generated,  
Treated or stored.

Samples collected:

7 mil film

4 mil film

settling

filter media

bag house dust

(See log book for details @ sampling)

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

EPA ID: NCR000000109

Facility Name: Arden Service Inc City: Arden

EVALUATION DATA: New:  Change:  Delete:  (  : Required)

Agency:  Date: Mo 01 / Day 10 / Year 95

TYPE:  CDI

Control Number Data Entry Personnel: 012

Person: 063 BRANCH 02 REASON

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applicable D: Del.)

Generators

|     |  |
|-----|--|
| GBF |  |
| GER |  |
| GGR |  |
| GLB |  |
| GMR |  |
| GOR |  |
| GPT |  |
| GRR |  |
| GSC |  |
| GSO |  |

Transporters

|     |  |
|-----|--|
| TGR |  |
| TMR |  |
| TOR |  |
| TRR |  |
| TWD |  |

USED OIL

|     |  |
|-----|--|
| TUO |  |
| TFO |  |
| BUO |  |
| MUO |  |
| FUO |  |
| RUO |  |

DBF

|     |  |
|-----|--|
| DCH |  |
| DCL |  |
| DCP |  |
| DFR |  |
| DGS |  |
| DGW |  |
| DIN |  |

TSD's

|     |  |
|-----|--|
| DLB |  |
| DLF |  |
| DLT |  |
| DHC |  |
| DHR |  |
| DOR |  |
| DOT |  |

|     |  |
|-----|--|
| DEB |  |
| DPP |  |
| OSI |  |
| DIR |  |
| DTS |  |
| DWF |  |

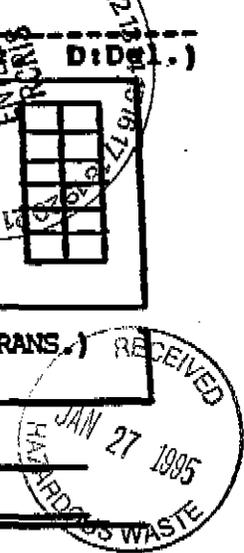
COMPLIANCE SCHEDULE (TSD, GEN, TRANS.)

FEA  CAS

Evaluation Comments: (72) 1:

2:

NOV Drafted 95-  
CDI



VIOLATION DATA: New:  Change:  Delete:

Agency:  Type:  GGR Date (ndy) Determined: 01 / 10 / 95 Class: 2

Priority:  Branch: 01 Person: 063 Seg. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Type:  SR Reg. Description (30): 262.11

Comment (72):

Agency:  Type:  Date (ndy) Determined:  /  /  Class:

Priority:  Branch:  Person:  Seg. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Type:  Reg. Description (30):

Comment (72):

Agency:  Type:  Date (ndy) Determined:  /  /  Class:

Priority:  Branch:  Person:  Seg. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Type:  Reg. Description (30):

Comment (72):

Continue violation data if necessary -

Handwritten mark



RCRA INSPECTION REPORT

1) Facility Name: ARDEN SERVICES INC

ID Number: NA

Type of facility:

Ownership: facility owned by DuPont and Process operated by contract w/ the CCA group - Greensboro NC.

Contact: MIKE TORRENCE - Safety Coordinator

Phone Number: 704 684 3926

Facility Location (address): 22 Old Shonts Rd

City, State, Zip: ARDEN NC 28704

2) Survey Participants:

R POWELL M. TORRENCE  
K MASLER

3) Date of Inspection: 1-10-94

4) Purpose of Inspection: ~~EST~~ CES

5) Facility Description:

This facility accepts unexposed x-ray and photographic film and chemically separates the silver containing gel from the polyester film. The gel is dried and sent to a facility in S.C. where the silver is reclaimed. DuPont is the 1<sup>o</sup> customer. Off-spec waste emulsion (used to coat the film) is also accepted at the site. No material is manifested to or from the facility. Film is either 4 mil or 7 mil and comes in rolls or sheets. Some uncoated polyester film



PROCESS:

Coated film is chopped into small pieces then ground into flakes. The flakes are taken to the "wash" area. Air filter dust from this grinder is sent to PGP in Coalfield TN where it is burned to reclaim silver.

[uncoated film is ground and set for recycling into polyester fibers (This is in a separate grinding machine & filter)]

The flakes in the wash area are placed into 3500 gal vats where they react w/ caustic, heated then rinsed w/ acid to neutralize. Then rinsed at high temperature. The emulsion (separated from goes to tank farm for settling water is decanted off and goes to the sewer. (permitted by MSD - check for Zn, Cr, and Silver every batch using A.A.) The "settlings" are centrifuged and are shipped to United Resource Recovery Center in Duram SC. where silver is recovered by "roasting". The polyester film

Facility name and ID #: Arden Services Inc.

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- is dried and sent for recycling.
- filter media from decanting and centrifuging that can not be sent to S.C. due to low silver content is sent to PGP in Coalfield, Tenn.

7) Site Deficiencies:

- 262.11 - NO waste determination has been made on materials shipped off-site (settling, filter media, bag dust)
- no waste determination made on materials accepted for their process (film, emulsion)

Signed:

Robert Brown  
Inspector/Reviewer

\_\_\_\_\_  
Facility Contact

1-10-95  
Date

Arden Services Inc.  
Regulatory Status Determination

To determine the RCRA status of Arden Services Inc., the status of their process must first be assessed.

The facility accepts on-site waste/off-spec, undeveloped, photographic and x-ray films and waste emulsion that is used to coat film. Both of these materials contain silver. The purpose of Arden Services process is to separate the silver containing gel from the polyester film. The gel is then dried and sent to a facility in South Carolina for the recovery of the silver.

261.1(c)(4) defines reclaiming.

.. a material is reclaimed if it is processed to recover a useable product, or if it is regenerated.

G.S. 130A-290 defines treatment

...means any method, technique or process, including neutralization, designed to change the physical, chemical or biological characteristic or composition of any hazardous waste so as to neutralize such waste or so as to render such waste non-hazardous, safer for transport, amenable for recovery, amenable for storage or reduced in volume...

The process could be defined as reclaiming if the settlings are classified as a product. The only use for this product is to reclaim silver from it at the facility in South Carolina, there is no other use. The material is not being regenerated, ie. it can not be used as a coating on film for photographic or x-ray uses.

The other way the process can be called reclamation is if EPA has granted an exemption for recovery at two separate locations (states) and two separate processes. In this case the facility would not have to have a permit per 264.1(g)(2).

The process must therefore be classified as treatment as its sole purpose is to make the waste emulsion and films more amenable for recovery (silver).

If the process is declared to be reclamation, the facility must comply with 266.70 including: notification as a recycler, comply with subpart B of 262 (manifesting), and keep records that document that speculative accumulation has not occurred.

If the process is declared to be treatment the facility must obtain a RCRA permit.

The status of the materials sent off-site and accepted for processing will depend, of course, on TCLP testing. Assuming that all waste streams extract at greater than 5.0 ppm silver, their regulatory status is discussed below.

## FILM

The film is unexposed film so it does not meet the definition of spent materials. It is a solid waste and a discarded material under the definitions of 261.2(a)(1) and 261.2(a)(2) as it can not be used for its intended purpose and it is being abandoned (or recycled if the process is defined as recycling/reclamation). Under 261.2(b) the film would be a solid waste if the process is not classified as reclamation/recycling as the material is being abandoned by being accumulated and treated before, or in lieu of, being abandoned [261.2(b)(3)].

So either way the process is classified the film would be a solid waste.

As the film is undeveloped, it does not meet any of the definitions under 261.1(c) (spent material, sludge, by-product, commercial chemical product or scrap metal) and therefore none of the solid waste exemptions in 261.2(c) (table 1) for reclamation or speculative accumulation apply, even if the process is defined as being reclamation.

261.2(e) gives exemptions for materials being solid wastes if they are being recycled as long as they are being either: used or reused as ingredients, substituted for products or, returned to the original process with out reprocessing. None of these exemptions apply so the material is definitely a solid waste no matter what the process is defined as.

There are no exceptions under 261.3 through 261.5 that would cause the film not to be defined as a hazardous waste and there fore be manifested to Arden Services no matter what the designation of the process. However, the film may be classified as a recycleable material under 261.6(a)(1) if the process is defined as reprocessing/recycling. If this is the case the film must still be manifested to Arden Industries, and Arden Industries must notify as a recycler (the Designated Facility per 260.10(20)(3)) [261.6(a)(2)(iii) referenced 266 subpart F and 265.71 and 265.72] and document that speculative accumulation is not occurring.

## EMULSION

The status of the waste emulsion will be the same as the film if it is categorized as discarded material or a spent material (if it can no longer be used due to contamination).

If it is categorized as a by-product (261.1(c)(3)), and Arden Service's process is defined as reclaiming, then it will not have to be manifested to the facility as it is not a solid waste per 261.2(c)(3). It will, however, have to be manifested if Arden Service's process is defined as treatment.

## Bag House Dust and Filter Media

This material is defined as a sludge (261.1(c)(2) and 260.10). As it is being shipped by Arden Services directly to a silver reclaimer, it will not be classified as a solid waste (261.2(c)(3)) and therefore does not have to be manifested.

### Settlings

This is the dried emulsion that Arden Services sends to the facility in South Carolina for recovery. Following the same procedure as above, this material will be classified as a hazardous waste but also a recyclable material going for recovery so it will be regulated under 261.6(b) and 266 subpart F. This means that Arden Services must notify as a generator of recyclable materials, comply with the applicable sections of 262 and manifest the settlings to the Duncan, SC plant.

### Scenario 1

If all samples exceed TCLP, or any one of the incoming waste streams exceed TCLP and the process is defined as reclaiming/recycling:

- Arden Services must notify as a recycler (designated facility) and a generator of recyclable materials.
- Film must be manifested to facility.
- Generator of films must count them as hazardous waste.
- Emulsion does not have to be manifested (if classifies as a by-product).
- Bag house dust and filter media do not have to be manifested.
- Comply with 262 and document that speculative accumulation not occurring.

### Scenario 2

If materials coming into the plant are < TCLP. Settlings are > TCLP.

- Arden Services only has to notify as a generator of recyclable material.
- Manifest settlings to South Carolina.
- Comply with 262 and document that speculative accumulation not occurring.
- baghouse dust, filters and emulsion the same as above.

### Scenario 3

Process is defined as treatment.

- Facility must apply for a permit and comply with all of above.