



State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Solid Waste Management

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
William L. Meyer, Director



GEN

January 31, 1995

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

NCR 000000109

Mr. Tim Dover  
Arden Services Inc.  
22 Old Shoals Road  
Asheville, North Carolina 28704

Dear Mr. Dover:

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. Section 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

The North Carolina Hazardous Waste Section is reviewing your facility to determine the applicability of the Resource Conservation and Recovery Act (RCRA) regulations to your process per 40 CFR 262.11. We are concerned that your facility is engaged in the treatment and/or the generation of hazardous wastes. To make an adequate determination, samples of the materials coming into your facility for processing and the material shipped from your facility for silver recovery must be collected. The Section will be present when the samples are collected for the purpose of collecting split samples for analysis in the State laboratory.

The samples that we request are as follow:

- 1) A representative sample of the emulsion that is sent to your facility from Dupont.
- 2) Representative samples of the film that is sent to your facility consisting of separate samples for each type of film that is processed, eg. 4 mil and 7 mil, and others as applicable.
- 3) A representative sample of the "settlings" that are sent off-site for silver recovery.

- 4) A representative sample of the bag-house dust from the grinding of the coated polyester.
  
- 5) A representative sample of the filter media sent to PPG Inc.

The samples must be collected in accordance with SW-846 standards including adequate decontamination between sampling, handling methods and chain-of-custody protocols. You may use any qualified laboratory of your choosing to analyze the samples.

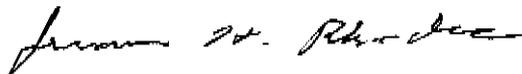
The analysis that should be performed are at least TCLP metals. If there are any other characteristics of the films that may cause them to be hazardous wastes, you must analyze for those constituents as well (eg. volatile or semi-volatile organics).

We would appreciate if you could give Roberta Pursell at least one week notice prior to the sampling event to allow time to schedule.

If you have any questions on this matter, please call Roberta Pursell at (704) 251-6208.

If the requirements above are not met, pursuant to N.C.G.S. Section 130A-22(a) and 15A NCAC 13B .0701-.0707, further enforcement action may be taken.

Sincerely,



Jerome H. Rhodes, Chief  
Hazardous Waste Section

JHR/jsp/ardenser

cc: Keith Masters  
Roberta Pursell  
Nann Gutherie  
Central Files