

N.C. DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES  
DIVISION OF SOLID WASTE  
HAZARDOUS WASTE SECTION

Circle one:  
G, **I**, P, GW, C, E

FILE DOCKET

DATE

ITEM

①  
②

10-11-95

Evaluation data

11.27.95

CSE report

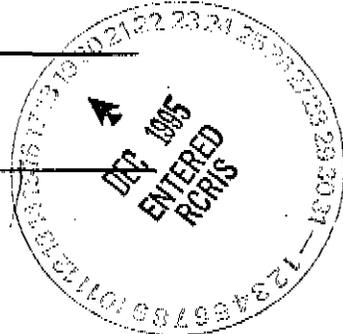
2

RCRIS

EPA ID#: NCR000001537  
Facility name: Dai Nippon (DNP) City: Concord

Evaluation data:  
New:  Change: Delete:

Person: 025 Branch: 01  
Agency: State Reason:



Supervisor NOV Tracking Info  
Type: ~~CEI~~ CSE 11-27-95  
Initial Inspection Date: 10/11/95  
Docket Number: 96-003  
Reinsptdate:  
COMMENTS: Small Generator Inspection

GENERATORS

GER: GRR: GLB: GMR: GOR: GPT: GSQ:

Facility Determined to be in compliance - 11/27/95

VIOLATION DATA: New:  Change: Delete:

1. Agency: State Type: GPT Date Determined: 10/11/95  
Class: Priority: Seq.#  
Return to Compliance: 11/11/95  
Actual Date: 11/27/95  
Reg Description: 40 CFR 262.34(d)(2) ref 265.174  
Comment:
2. Agency: State Type: GPT Date Determined: 10/11/95  
Class: Priority: Seq.#  
Return to Compliance: 10/11/95  
Actual Date: 10/11/95  
Reg Description: 40 CFR 262.34(d)(4) ref 262.34(a)(2) & (a)(3)  
Comment:
3. Agency: State Type: GPT Date Determined: 10/11/95  
Class: Priority: Seq.#  
Return to Compliance: 11/11/95  
Actual Date: 11/27/95  
Reg Description: 40 CFR 262.34(d)(5)(ii)  
Comment:
4. Agency: State Type: GPT Date Determined: 10/11/95  
Class: Priority: Seq.#  
Return to Compliance: 11/11/95  
Actual Date: 11/27/95  
Reg Description: 40 CFR 262.34(d)(5)(iii)  
Comment:

*Handwritten signature*

# Small Quantity Generator Inspection Report

c = copies made; \* = violation; P = photo taken

Facility Name: Dai Nippon IMS American Corp - Operation 7/95 (4 employees)  
Address: 4524 Enterprise Drive Concord, N.C. 28027  
EPA ID #: NCEP000001537  
Inspection Date: Oct. 11, 1995 Last Inspection: N/A  
Contact: Mr. Darshan Pandya Type of Inspection: CEI  
Present at Inspection: Darshan Pandya, Masato Koike

Type of Business: Manufacture / Cut Ribbon for Fax Machines, Marking Silver  
Processes: Apply Ink to Fax Ribbon Roll  
Waste Generated: Doc. Cleaning & Printing on Fax Ribbon  
Ethyl Acetate 5-10% no other listed Solvents Cleaning ink jets

Transporters: FAM Seasons Env. NCD 991277732 TEDs Laidlaw Env. NCD 000648451

Manifests:  
Signed Copies?  Filled out correctly?   
Treatment Standards?

\* Inspection Records: No Records - 15A NCAC 13A .0010(i) (W) 10/13/95

Emergency Contacts:  
Emergency Coordinator? Contingency Plan not fully developed  
\* Info by Phones:  
\* Emergency Coordinator phone? Fire Department phone?  
\* Location of fire/spill equipment?  
\* Personnel Trained: No training

Annual Report: N/A

Waste Analysis:  
Accumulation Areas: Description: 3 areas - machines are cleaned each weekend. Est. 2/3 Gallons generated during clean up

Closed/Labeled/Dated/<55 Gallons?  
Storage Area: Description: Fire Cabinet 5/5 Gallon Containers  
One 5G/Container not dated/labeled Dated 6/1/95 on all drums

Closed/Labeled/Dated/< 180 Days/Good Condition  
Less Than 6000 kg on Site? Communication Device? Telephones -

Recommendation(s) 1. Arrangements have been made w/ Fire Marshall  
2. Two persons participate in waste generation

Signature: Grace T. Ullis Facility Contact: Darshan Pandya  
Date: October 11, 1995

Facility determined to be in compliance  
G. Ullis 11/27/95

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Mooresville Regional Office

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary



Division of Solid Waste Management  
Hazardous Waste Section

November 27, 1995

Mr. Darshan Pandya  
Dai Nippon IMS (America) Corp.  
4524 Enterprise Drive N.W.  
Concord, N.C. 28027

Dear Mr. Pandya:

The information that you submitted has been reviewed by this Office and was found to address the item(s) noted in the Notice of Violation Docket # 96-003 issued to Dai Nippon on October 11, 1995. This correspondence is to inform you of compliance with the Notice.

If you have any questions or require further assistance concerning this matter do not hesitate to contact me at (704) 663-1699.

Sincerely,

Jesse W. Wells  
Waste Management Specialist  
Hazardous Waste Section

cc: Keith Masters

# DNP

## Dai Nippon IMS (America) Corp.

(The Dai Nippon Printing Group)

4524 Enterprise Drive N.W.  
Concord, NC 28027 U.S.A.

Tel: (704) 784-8100  
Fax: (704) 784-7190

November 21, 1995

Mr. Jesse W. Wells  
Hazardous Waste Section  
Solid Waste Management Division  
North Carolina Department of Environmental,  
Health and Natural Resources  
919 North Main Street  
Mooresville, NC 28115

Re: Items Cited and Specified in notice of Violation

Dear Mr. Wells:

This letter is to affirm that Dai Nippon IMS (America) Corp. ("Dai Nippon") has addressed the items cited and specified in the Notice of Violation dated October 11, 1995 (attached). Dai Nippon retained the environmental consulting firm of ENSR Consulting and Engineering ("ENSR") to help Dai Nippon address these items. With the aid of ENSR, Dai Nippon has appropriately posted telephone numbers of emergency contacts and coordinators; has conducted weekly hazardous waste inspections (as documented in the attached Weekly Hazardous Waste Inspection Log); has prepared a RCRA Contingency Plan, including a list of emergency contacts and coordinators (attached); and has conducted employee training (as documented in the attached employee training log).

Please let me know if you require any additional information.

Very truly yours,  
*Darshan Pandya*  
Darshan Pandya

# **RCRA CONTINGENCY PLAN**

**DAI NIPPON IMS (AMERICA) CORPORATION  
4524 ENTERPRISE DRIVE  
CONCORD, NORTH CAROLINA 28027**

# RCRA CONTINGENCY PLAN FOR DAI NIPPON IMS (AMERICA) CORP.

4524 ENTERPRISE DRIVE  
CONCORD, NORTH CAROLINA

## INTRODUCTION

The Dai Nippon facility in Concord, NC is a production facility with processes which use inks and solvents which are classified as hazardous materials. Due to process constraints and cleanup procedures, waste materials accumulate at the site. These wastes are required by government regulation to be handled in a specified manner. Some waste is classified as hazardous waste and must be managed as required by the North Carolina Department of Environment, Health and Natural Resources (DEHNR) as such.

The Resource Conservation and Recovery Act (RCRA) is Federal law addressing hazardous waste and its management from generation to final disposition. Delegation of authority has been given to DEHNR to manage hazardous waste in North Carolina. Subsequent State regulations have been enacted to give guidance to generators of hazardous waste in North Carolina and require accountability for management of this waste from "Cradle to Grave".

Specific requirements of DEHNR include the maintenance of a plan and education of all employees that are part of the hazardous waste program at which these wastes are generated, transported, treated, stored, and disposed of (including any part or combination of these activities). The employees participating in hazardous waste activities must be trained as to the specific duties associated with conducting their function. This training must be given to an employee within a certain time period of hire, and also given refresher training annually. Part of this training is the review of this document and how to utilize it as an effective tool in the hazardous waste management program for this site.

The provisions of this plan must be carried out immediately whenever there is a fire, explosion and/or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

The EPA ID NUMBER for this location is **NCR000001537**.

**IF HAZARDOUS WASTE HANDLERS AT THIS FACILITY ENCOUNTER AN EMERGENCY SITUATION INVOLVING AN INCIPIENT STAGE FIRE THEY MAY ATTEMPT TO USE A FIRE EXTINGUISHER TO PUT IT OUT. IF THIS CANNOT BE DONE SAFELY OR THE FIRE GETS LARGE, BACK OUT AND EVACUATE ALL PERSONNEL.**

**IN ALL CASES CALL THE FIRE DEPARTMENT.**

**PERSONNEL AT THIS FACILITY WHO ARE CURRENTLY CERTIFIED IN CPR AND FIRST AID MAY ASSIST IN SITUATIONS REQUIRING THESE SKILLS.**

**WASTE GENERATION**

Part of the process at this facility requires application of a marking ink near the end of each roll of finished product as an indicator of the roll running out. Marking Ink is applied at a point in the process and the viscosity of the ink supply solution is used as a control for the indication that the ink solution is not at a quality for further use. At that point the process is stopped and the waste ink solution is put into 5 gallon containers to be held for disposal. The 5 gallon containers in which the ink solution originally came are reused as these waste containers. Also at times, the ink application equipment is cleaned with solvent. The waste produced from this process is also put into the same 5 gallon containers for disposal. Other equipment in the production area is also cleaned routinely with solvent and collected as waste. The characteristics of these similar wastes indicate the problem to be flash point, and since no other listed waste is correct to describe it, a D001 waste classification has been assigned to it. In preparing to have this hazardous waste transported by a licensed transporter, a proper DOT shipping name for it would include:

"(D001) INK AND SOLVENT MIXTURE, FLAMMABLE LIQUID, N.O.S., 3, UN1993, PG III

"

## **HAZARDOUS WASTE STORAGE**

When waste ink solutions and cleanup wastes are generated, the resulting hazardous waste must be stored properly. The 5 gallon containers in which the ink and solvent were received may be used for waste storage if these containers are in good condition and suitable for shipment under DOT regulations. The "Hazardous Waste" labels available from the Emergency Coordinator must be filled out completely with the exception of the manifest number which should be filled in when shipments are scheduled and a number is assigned. Smaller containers which once contained these materials and have been emptied are accumulated as nonhazardous waste, but they are disposed of by the same vendors that handle disposal of the hazardous waste and normally are part of the same shipments.

The present storage area for the hazardous waste includes two fire cabinets with containment shelving that is constructed to hold 5 gallon and lesser volume containers. The use of pans placed under the cabinets which can hold a volume of at least 50 gallons each will provide secondary containment. For full inspection of the containers it is required that each container be lifted and rotated completely to afford a full view to determine the integrity of each one. All hazardous waste will be placed inside the cabinets and the doors will remain closed when no handling activity requires them to be opened.

## **SATELLITE WASTE STORAGE**

At the Barcode Slitting Machine, a container will be maintained for waste solvent used for cleanups. This container will be labeled with a "Hazardous Waste" label as the stored hazardous waste is labeled. The accumulation date will stay blank until the container is full. At that time it will be dated and moved to the Hazardous Waste Storage Area.

## **HAZARDOUS WASTE WORK TITLES**

The following are the work titles and duties for employees handling hazardous waste at this facility:

### **Emergency Coordinator**

- 1) Coordinate the day-to-day functions of RCRA related activities at this facility and be responsible to coordinate all routine and emergency activities or delegate the responsibility to an Alternate Emergency Coordinator if unavailable.
- 2) Receive annual RCRA training for yourself from an outside source, conduct annual refresher training for previously trained RCRA employees, and conduct initial RCRA training for new hires.
- 3) Maintain files of all RCRA records including manifests, waste characterizations, agency and DNP correspondence, training records, spill documentation, and any other related paperwork. Keep this Contingency Plan up to date and be very familiar with its contents.
- 4) Be site contact for regulatory agency representatives during inspections and for required information.
- 5) Ensure compliance with all RCRA requirements including waste management from generation to final disposal.
- 6) Ensure that the Alternate Emergency Coordinators are familiar with the duties of the Emergency Coordinator.

### **Alternate Emergency Coordinator**

- 1) Become familiar with the duties of the Emergency Coordinator.
- 2) Assume delegation of the Emergency Coordinator's duties in his absence or assume role of Hazardous Waste Worker when on-site and another coordinator is in charge.
- 3) Attend annual RCRA Training.

### **Hazardous Waste Worker**

- 1) Be familiar with the basic requirements of RCRA.
- 2) If hazardous waste or waste which might be hazardous is generated or if an emergency involving hazardous waste or materials which may result in the generation of hazardous waste occurs, implement this contingency plan.

## EMERGENCY CONTACTS

### EMERGENCY COORDINATOR

Darshan Pandya (704) 599-0978

Lisa Hencherick (704) 782-6372

### ALTERNATE EMERGENCY COORDINATORS

Russ Carr (704) 782-9893

Jane Rigano (704) 528-0060

Alan Biles (704) 782-2603

Clarence Carithers (704) 536-0052

John Steel (704) 786-4348

Tim Stancill (704) 788-9603

### ***IF AN EMERGENCY OCCURS WHICH REQUIRES REPORTING CALL:***

**NATIONAL RESPONSE CENTER 1-800-424-8802**

- 1) name, address, and EPA ID No. for this location [ NCR000001537]
- 2) date, time, and type of incident;
- 3) quantity and type of hazardous waste involved;
- 4) extent of injuries, if any; and
- 5) estimated quantity and condition of removed materials, if any.

### ***IN ADDITION TO THE NRC, NOTIFY THE STATE OF NORTH CAROLINA DEHNR AT:***

**(919) 733-5291 (during working hours) OR (800) 662-7956 (24 hours)**

**ALSO CALL DEM - MOORESVILLE REGIONAL OFFICE AT: (704) 663-1699**

Refer to the Emergency Phone Contact sheet posted at plant telephones for other emergency numbers which may be used.

**HAZARDOUS WASTE WORKERS INCLUDE THE FOLLOWING DNP EMPLOYEES:**

Russ Carr  
Ray Tilley  
John D. Davis  
Frances Wood

Vickie C. Hileman  
Sheral Hartsell  
Sarah Jane Rigano  
Kay Jones  
Wilma Whittaker  
Ryuichiro Hirano  
Jeff Bivens  
Bobby Meeks  
Ed Barringer  
Kumiko Yamakawa  
Joseph Weeks  
Darshan Pandya  
Lisa Hencherick  
Alan Biles  
Irving Mills  
Lisa Edwards  
Peggy Brendle  
Ava Daniels  
Linda Kimble  
Clarence Carithers  
Ronald E. Jones  
Felix E. Hayes  
Hiroshi Yuri  
Clark Cook  
Timothy D. Stancill  
Teresa R. Allman  
Jane E. Tarlton  
John C. Steel  
David G. Elliott  
G.A. Martin

## **EQUIPMENT**

The following equipment is maintained for use during emergencies:

- 1) Spill kit
- 2) Absorbent Material
- 3) Container
- 4) Gloves
- 5) Respirators
- 6) Tyvek Suits
- 7) Goggles

8) Broom/Dust Pan

Fire Extinguishers are located on each wall of the Manufacturing Area. Annual Fire Extinguisher Training will be conducted for the proper use of these.

A First Aid Kit is located on the Technical Office Wall.

**TRAINING**

Annual training will include review of this contingency plan and a discussion or video presentation of RCRA, in general.

**SPILL RESPONSE CONTRACTOR**

Four Seasons has been placed on retainer as the contractor to be contacted in the event of a large, emergency cleanup.



THE FOLLOWING DNP EMPLOYEES HAVE RECEIVED INITIAL RCRA TRAINING FOR THEIR DUTIES AT THE DNP FACILITY LOCATED IN CONCORD, NC:

PRINTED NAME (AS IT SHOULD APPEAR ON A CERTIFICATE)	EMPLOYEE SIGNATURE (ATTENDANCE CONFIRMATION)
1) John D. Davis	1) John D. Davis
2) Frances Wood	2) Frances Wood
3) Vickie C. Hileman	3) Vickie C. Hileman
4) GERALD HARTSELL	4) Gerald Hartsell
5) Russell D. Carr	5) Russell D. Carr
6) RAY TILLEY	6) Ray Tilley
7) Sarah Jane Rigano	7) Sarah Jane Rigano
8) Ray Jones	8) Ray Jones
9) Wilma Whittaker	9) Wilma Whittaker
10) Ryuichiro Hirano	10) Ryuichiro Hirano
11) JEFF BIVENS	11) Jeff Bivens
12) Bobby Meeks	12) Bobby Meeks
13) Ed BARRINGER	13) Ed L. Barringer
14) Kumiko Yamakawa	14) Kumiko Yamakawa
15)	15)
16)	16)
17)	17)
18)	18)
19)	19)
20)	20)

TRAINER: William L. Lynch, Jr.  
PRINTED NAME

William L. Lynch, Jr.  
SIGNATURE

THE FOLLOWING DNP EMPLOYEES HAVE RECEIVED INITIAL RCRA TRAINING FOR THEIR DUTIES AT THE DNP FACILITY LOCATED IN CONCORD, NC:

PRINTED NAME (AS IT SHOULD APPEAR ON A CERTIFICATE)	EMPLOYEE SIGNATURE (ATTENDANCE CONFIRMATION)
1) Joseph Weeks	1) Joseph Weeks
2) Darshan Pandya	2) Darshan Pandya
3) Lisa Henkerick	3) Lisa Henkerick
4) Alan Biles	4) Alan Biles
5) Irving Mills	5) Irving Mills
6) Lisa Edwards	6) Lisa Edwards
7) Peggy Brendle	7) Peggy Brendle
8) Ava Daniels	8) Ava Daniels
9) Linda Kinble	9) Linda Kinble
10) CLARENCE CARITHERS	10) Clarence Carithers
11) Ronald E. Jones	11) Ronald E. Jones
12) Felix E. Hayes	12) Felix E. Hayes
13) Hiroshi Yuri	13) Hiroshi Yuri
14) CLARK COOK	14) Clark Cook
15)	15)
16)	16)
17)	17)
18)	18)
19)	19)
20)	20)

TRAINER: William L. Lynch, Jr.  
PRINTED NAME

William L. Lynch, Jr.  
SIGNATURE

**THE FOLLOWING DNP EMPLOYEES HAVE RECEIVED INITIAL RCRA TRAINING  
FOR THEIR DUTIES AT THE DNP FACILITY LOCATED IN CONCORD, NC:**

PRINTED NAME (AS IT SHOULD APPEAR ON A CERTIFICATE)	EMPLOYEE SIGNATURE (ATTENDANCE CONFIRMATION)
1) TIMOTHY D. STANWELL	1) Timothy D. Stanwell
2) Teresa R. Allman	2) Teresa R. Allman
3) JANE E. TARTON	3) Jane E. Tarton
4) John C. Steel	4) John C. Steel
5) DAVID G. ELLIOTT	5) David G. Elliott
6) G.A. MARTIN Jr.	6) G.A. Martin Jr.
7)	7)
8)	8)
9)	9)
10)	10)
11)	11)
12)	12)
13)	13)
14)	14)
15)	15)
16)	16)
17)	17)
18)	18)
19)	19)
20)	20)

RAINER: William L. Lynch, Jr.  
PRINTED NAME

William L. Lynch, Jr.  
SIGNATURE

RCRIS

EPA ID#: NCR000001537  
Facility name: Dai Nippon (DNE) City: Concord

Evaluation data:  
New:  Change: Delete:

Person: 025 Branch: 01  
Agency: State Reason:

*slow  
Violations*

Supervisor NOV Tracking Info

Type: CEI  
Initial Inspection Date: 10/11/95  
Docket Number: 96-003  
Reinsptdate:  
COMMENTS: Small Generator Inspection



GENERATORS

GER: GRR: GLB: GMR: GOR: GPT: GSQ:

VIOLATION DATA: New:  Change: Delete:

- Agency: State Type: GPT Date Determined: 10/11/95  
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Return to Compliance: 11/11/95  
Actual Date:  
Reg Description: 40 CFR 262.34(d)(5)(iii)  
Comment:

Solid Waste Management Division  
Hazardous Waste Section

NOTICE OF VIOLATION

To: Dai Nippon IMS (American Corp)  
Address: 4524 Enterprise Drive  
Concord, N.C. 28027  
EPA ID# NCR 00001537

Docket # 96-003  
Inspection Date October 11, 1995  
Facility Type Small Generator

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 October 11, 1995, Jesse W. Wells 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>40 CFR 262.34(d)(2)</u> <u>ref 265.174</u>	<u>No weekly inspections was being maintained for hazardous waste in storage. (15A NCAC 13A.001(d))</u>
<u>40 CFR 262.34(f)(4)</u> <u>ref 262.34(e)(2) &amp; (3)</u>	<u>Accumulation Start Date of "Hazardous Waste" was not clearly marked on one container in storage. (Concluded at time of inspection)</u>
<u>40 CFR 262.34(d)(5)(ii)</u>	<u>Develop emergency response information &amp; post next to phone (example emergency plan provided.)</u>
<u>40 CFR 262.34(d)(5)(iii)</u>	<u>All employees must be familiar with proper hazardous waste handling &amp; emergency procedures relevant to their responsibilities</u>

You are hereby required to comply with the noted violation(s) by November 11, 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.

October 11, 1995  
(Date)

Jesse W. Wells  
N.C. Hazardous Waste Section

I, Jesse W. Wells, hereby certify that I have personally served a copy of this Notice on:

Mr. Darshan Pandya  
(Name)

at Dai Nippon  
(Location)

on October 11, 1995.

Darshan Pandya  
(Recipient Signature)

copies to: field files  
central files  
Regional Manager

# Small Quantity Generator Inspection Report

c = copies made; \* = violation; P = photo taken

Facility Name: Dai Nippon IMS American Corp - Operation 7/95 (4 employees)  
Address: 4524 Enterprise Drive Concord, N.C. 28027  
EPA ID #: NCDPR000001537  
Inspection Date: Oct. 11, 1995 Last Inspection: N/A  
Contact: Mr. Darshan Pandya Type of Inspection: CEI  
Present at Inspection: Darshan Pandya, Masato Koike

Type of Business: Manufacture / Cut Ribbon for Fax Machines. (Dyeing, Silver)  
Processes: Apply Ink to Fax Ribbon Roll  
Waste Generated: Ink - Cleaning & Printing on Fax Ribbon  
Ethyl Acetate 5-10% no other listed solvents. Cleaning ink jets.

Transporters: Fall Seasons Env. NCD 991277 732 TSDs: Laidlaw Env. NCD 000648451

Manifests:  
Signed Copies?  Filled out correctly?   
Treatment Standards?

\*Inspection Records: No Records - 15A NCAC 13A . 0010(i) Q/W 10/13/95

Emergency Contacts:  
Emergency Coordinator? Contingency Plan not fully developed

\*Info by Phones:  
\*Emergency Coordinator phone? Fire Department phone?  
\* Location of fire/spill equipment?

\*Personnel Trained: No training.

Annual Report: N/A

Waste Analysis:

Accumulation Areas: Description: 3 areas - machines are cleaned each weekend. Est. 2/3 Gallons generated during clean up

Closed/Labeled/Dated/<55 Gallons?

Storage Area: Description: Fire Cabinet 5/5 Gallon Containers  
One 5G/Container not dated/labeled Dated 6/1/95 on all drums.

Closed/Labeled/Dated/< 180 Days/Good Condition

Less Than 6000 kg on Site? Communication Device? Telephones -

Recommendation(s) 1. Arrangements have been made w/ Fire Marshall  
2. Two persons participate in waste generation.

Signature: James W. Wells  
Date: October 11, 1995

Facility Contact: Darshan Pandya