

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

- 19. 4-1-97 Letter regarding fuel holding tanks a treatment system
- 20. 4-2-97 TO: Wayne Gainous Fr: Daniel Bius Re: Solid Waste Variance
- 21. 8-7-97 Letterman requesting a solid waste variance
- 22. 7-8-97 Solid Waste Variance
- 23. 6-30-97 Solid Waste Variance
- 24. 12-17-97 Meeting attendance Record
- 25. 12-31-97 Letter requesting the variance issue
- 26. 12-3-97 Solid Waste Variance

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

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
William L. Meyer, Director



24

December 3, 1997

Andy Simmons
American Distillation, Inc. ✓
1690 N.E. Royster Road
Post Office Box 400
Leland, North Carolina 28451

S

RE: Solid Waste Variance
Distillation of Alcohols
EPA Id # NCR 000 001 651

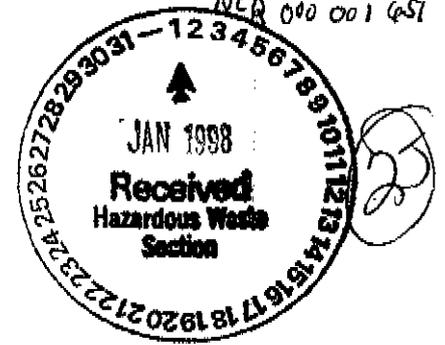
Dear Mr. Simmons:

Effective immediately, the Hazardous Waste Section (Section) is hereby revoking the current solid waste variance issued June 20, 1997 based on information the Section has received during recent investigations at American Distillation, Inc. (ADI) and High Rise Service, Inc. The still bottom management practices recently determined do not follow the management standards described by ADI during the reviews of the solid waste variance, and they do not conform to conditions stipulated by the Hazardous Waste Section in its approval letters.

By January 2, 1998 ADI shall submit to the Section the following information regarding the management of material under the solid waste variance provisions of 40 CFR 260.30(b), codified at 15A NCAC 13A .0103:

- 1) A detailed inventory describing the volume, location and type of
 - material currently on-site awaiting processing,
 - material in the distillation system itself, and
 - residues on-site/off-site from ADI's management of the material.
- 2) A list of clients who have sent material to ADI under the solid waste variance since September 14, 1995, and the corresponding documentation between ADI and its clients indicating that clients were consulted as to where the clients' waste would be sent prior to the waste leaving ADI.
- 3) A workplan describing how ADI intends to manage the current material and waste on-site including: description of storage vessels and associated volumes; waste analysis plan; method(s) to clean equipment used to manage materials and waste; and confirmatory sampling to indicate material has not been released to the environment.

AMERICAN DISTILLATION, INC.
P.O. BOX 400
1690 NE ROYSTER ROAD
LELAND, NORTH CAROLINA 28451
(910) 371-0993 FAX (910) 371-2971



December 31, 1997

James A. Carter
Chief
Hazardous Waste Section
NCDENR

Reference: Information requested in your letter to Mr. Simmons dated 12-3-97 concerning the variance issued to ADI on 6-20-97

Index for the included response to your letter

1. Main response letter dated 12-30-97; two pages.
2. Witco product status dated 12-17-97; one page.
3. Letters between myself and Mr. Don Stahlberg of Witco. Three letters:
 - a) Three pages dated 7-24-96
 - b) One page dated 8-26-96
 - c) One page dated 12-30-97
4. ADI objectives and status; two pages dated 12-16-97

Will Oliver
Will Oliver - ADI

AMERICAN DISTILLATION, INC.
1690 NE ROYSTER ROAD
P.O. BOX 400
LELAND, NORTH CAROLINA 28451
(910) 371-0993 FAX (910) 371-2971

December 30, 1997

James A. Carter
Chief
Hazardous Waste Section
NCDENR

Reference: Information requested in your letter to Mr. Simmons dated December 3, 1997 concerning the variance issued to ADI on June 20, 1997.

Dear Mr. Carter,

Following is the information you requested in your letter.

- 1) "A detailed inventory describing the volume, location and type of ..."
 - a) Material currently on-site awaiting processing. The only material processed utilizing the variance has been isopropyl alcohol in a water and quaternary ammonium salt solution. There is presently no material directly in the ADI site; it is in storage at the railroad siding on the High Rise Construction property about 300 feet from the site. The stored material is either "in process" (single pass distillation) or crude waiting to be distilled. The "in process" material contains between 15 - 25% alcohol and will undergo one final distillation before returning the spent bottoms to Witco for disposal if necessary. This will be non hazardous hydrous material. The remaining crude has not been processed or handled. The attached list entitled "Witco Product Status" outlines the storage vessels and approximate volumes. The in process material contains a top layer of "foamy" type material. Quaternary ammonium salts are the bulk of many fabric softeners and show strong foaming tendencies in water, particularly as the per cent alcohol decreases. This foaming reduces the accuracy of the inventory. Water for washing the processing equipment and lines has been retained with the material.
 - b) Material in the distillation system itself -- None.
 - c) Residues -- There is no residue yet; only "in process" and crude is in ADI's custody at the rail road siding mentioned in (a) above.
- 2) List of clients who have sent material to ADI under the solid waste variance & documents. Only Witco has sent material in under the variance. They have agreed to take back the residue if necessary. See included three letters between Will Oliver and Don Stahlberg. One of the letters (dated December 30, 1997) discusses a current customer of Witco's that will probably take the "in process" material as a product with out futher processing.

3) A work plan describing how ADI intends to manage the current material ...

There is presently no waste to handle. The plan is to transfer the "in process" material back to the site for final distillation to recover the majority of the remaining alcohol. A steam line is being installed from the plant to the railroad siding so that the "in process" material can be heated & completely liquefied & returned to the plant. This will permit recovery of the remaining alcohol and yield a residue with a flash point above 140° F; this will not be hazardous. The spent material will be reloaded onto Witco's rail cars and returned to them if a buyer is not confirmed.

A high boiling pusher can be used (if required due to thickness) to complete the recovery of the alcohol. This would also yield a non hazardous residue; however, this probably would have to be burned if a buyer is not established.

The spent material would be checked for flash point using a closed cup system in the ADI laboratory. The incoming material is only hazardous because of flash point. Sampling to confirm release of the material to the environment involves visual checks of the storage and process areas. The bottom material is "slimy" in nature and quite insoluble in water; a spill or leak is quite apparent with visual inspection. No spill has been reported.

The "in process" material has had a high degree of interest from a company interested in using the product in a fabric softer formulation. Several samples were prepared and sent to the potential customer for testing. Robert Shory was the account manager with Tradco and on several occasions verbally informed me that the material would be consumed in this product. My most recent confirmation of this was in November 1997. Mr. Shory has left Tradco at this time; his new client intended to supply propylene glycol to ADI for use as a "pusher" in order to reduce the alcohol and water level to facilitate use in his product. Mr. Shory is available to elaborate on this ongoing opportunity.

Marketing of the spent material was the original intent and has remained a high probability option. As time passed, techniques to complete the alcohol recovery with ultimate return of the spent to Witco became the probable worst case option. Mr. Stallburg (of Witco) and myself had many discussions concerning the disposition of the bottom material.

ADI has devoted a tremendous amount of effort in trying to make this an almost completely recovered material. I had no idea that the duration of this effort would be so long and that it would damage our relationship with the NCDENR and cause such concern for ADI. I apologize for the concern and disappointment this has caused your department and would certainly welcome the opportunity to repair the damage to whatever extent possible.

I have included an attachment of the objections and status of ADI.

Sincerely Yours,



Will Oliver
Technical Director -- ADI

c.c. Andy Simmons
Larry Rosotti
Hugh Croom

12-17-97
W.M.O.

WITCO PRODUCT STATUS
IN-PROCESS

	<u>GALLONS*</u>	<u>GALLONS**</u>
GATX-20733	13,000	10,000
GATX-88292	M T	M T
UTLX-68685	M T	M T
UTLX-641757	6,000	4,800
UTLX-75739	12,000	9,600
UTLX-67441	12,000	9,600
Two storage tanks (at rail siding)	16,000	12,800

* This is the maximum level; the material foams excessively

** Water for washing the system is also included. This is my best evaluation using observations from our laboratory work. Adjusted for foam.

NEW CRUDE - UNPROCESSED

UTLX-67327 18,000 gallons (minimal foaming here)

Note: All of the above tanks are Witco rail cars except where the 2 tanks are noted. The 2 tanks were the first loaded and were intended for customers.

American Distillation, Inc.
P.O. Box 400
Leland, N.C. 28451
(910) 371-0993 Fax (910) 371-2971

July 24, 1996

Don Stalburg
Witco

Reference: IPA Recovery Rate and Product Status

Dear Don,

I have attached a balance sheet that should bring the project to current status. Please check this data and inform me of corrections that you are aware of at this time.

The balance is showing a recovery rate of between 40 to 42% of IPA. This takes into account the heels remaining in the returned rail cars and the small amount in the salts. The bottoms will be shipped to a permitted non-hazardous site for disposal since Mr. Wessersmidt has been unable to market the material.

The crude has significantly more color than the developmental samples originally supplied. This is probably due to iron contamination resulting from damaged liners in the rail cars.

An accurate composite sample has been very difficult to obtain as of this date. However, a new pipe rack has been put in service at the plant and a good composite will now be possible as the rail cars are transferred to the plant. Spot analysis of the rail cars to date have indicated very high water levels and, therefore, the low yields are as expected. The low yield to date has certainly strained the economics of the project.

I have several ideas to discuss with you that could improve this situation. One is to return the water and salts to Witco with a price reduction in the processing rate. Also, a price adjustment should be instituted reflecting composition changes. A proposal is attached.

ADI has put forth a great deal of effort on this project and looks forward to continuing the good relationship between our companies. I will call you this week to discuss this matter.

Respectfully,



Will Oliver
Technical Director- ADI

PAGE 1 of 3

Witco IPA Balance as of July 15, 1996

<u>R.R. At Site</u>	<u>Car No.</u>	<u>Status</u>	<u>Date Arrived</u>	<u>Date Depart</u>	<u>Initial Amount</u>	<u>Present Amount</u>
	UTLX 13673	FULL	4/15/96		188,000	188,000 #
	UTLX 68589	2/3	3/1/96		190,000	127,000
	UTLX 75739	FULL			190,000	190,000 ?
	UTLX 67441	E	3/4/96		190,000	- 0 - HEEL
					<hr/>	
					758,000	505,000 *
R.R. Returned	UTLX 641757		12/29/96	3/11/96	139,750	HEEL
	UTLX 641576					HEEL
	UTLX 67444				132,500	HEEL
	GATX 20733				138,950	HEEL
	UTLX 68597					HEEL
					<hr/>	
						80,000 * Approx

Total Shipped As Per Witco = 1,329,950 #
 " Less Heel = 1,250,000 # Approximate

<u>Product Returned</u>	<u>Date</u>	<u>Amount</u>
	12/27/95	41,900 #
	2/16/95	42,640
	3/21/96	42,920
	5/8/96	44,320
	6/21/96	44,060
	7/11/96	43,980
	In Progress	43,000 Approximate
		<hr/>
		302,820 #

Total Received	= 1,250,000
Less Heel	
Crude Remaining	= 505,000

Crude Consumed = 745,000

% Recovery = $\frac{302,820}{745,000} \times 100 = 40.6\%$

Suggested Revised Processing Fees
Effective upon Approval

July 22, 1996
Will Oliver

<u>Per Cent IPA in Crude</u>	<u>Agreement As Is</u>	<u>\$/#</u>	<u>Water and Salts Returned to Witco</u>
60 - 70	.170	.15	.140
50-60	.190	.17	.155
40-50	.210	.22	.170

Less than 40 - Preshipment approval required

American Distillation, Inc.
 P.O. Box 400
 Leland, N.C. 28451
 (910) 371-0993 Fax (910) 371-2971

August 26, 1996

Don Stalburg
 Witco
 Phone: 309-697-6220 Ext. 207
 Fax: 309-697-5463

Reference: IPA Recovery Program

Dear Don,

I discussed the proposed water treatment program with Serin Rao last week. The amount of chemicals required for treatment is between 5,000 to 10,000 pounds per rail car of crude IPA as per Serin. This amount is based on 5% salts in the crude.

ADI prefers to return the salts to Witco for handling. To make this more attractive, ADI is willing to credit Witco's account based on three thousand dollars per fully loaded rail car returned. Also, ADI is willing to reduce the rates and to adjust the fee schedule to encourage Witco to maintain the composition in the range originally agreed to. Following are the proposed rates:

<u>Per cent IPA in crude</u>	<u>\$/ # returned product</u>
60-70	.15 (original agreement was .17)
50-60	.17
40-50	.22
Less than 40	Pre shipment approval required

The water - salt mixture requires between 5 to 10 per cent isopropyl alcohol to keep the material in the liquid state at ambient temperature. The probable composition will be:

8-12 wt % salts
 6-8 % IPA
 80-86 % water

These changes will enable the program to become a routine operation for ADI. I look forward to your comments.

Respectfully,

Will Oliver
 Will Oliver
 Technical Director- ADI

Witco

Witco Corporation
U.S. Route 24
P.O. Box 9
Mapleton, IL 61547
(309) 697-6220
(309) 697-9493 Fax

December 30, 1997

American Distillers Inc.
1690 North East Royster
Leland, NC 28451
Attn: Will Oliver

RE: RECOVERED QUAT

Dear Mr. Oliver:

I believe we have found a customer for the recovered quat you are producing. They will use the quat as a substitute for a product they currently buy from us as a raw material. I would like to confirm this with our sales group before I reveal their name.

Only minor testing should be required before shipments could start from your plant directly to this customer. Any questions, please do not hesitate to call me at (309)697-6220, extension 207.

Sincerely,



E Donald Stahlberg
Assistant Plant Manager
WITCO Corp.

EDS:ear
CC: Serin Rao
g:(w)recquat.eds
ADI (910)871-2971
Fax: (504)442-1619

page 1 of 1



A Company Dedicated To Total Quality

AMERICAN DISTILLATION, INC. OBJECTIVES AND STATUS
Will Oliver - Technical Director

ADI was founded in early 1992 with the idea that success would follow if the following primary objectives were achieved and adhered to:

- 1) Operate a safe and environmentally sound plant as per the requirements of the CFR's
- 2) Provide technical support in the form of process development for problems brought to us by our customers
- 3) Be willing and capable of retro-fitting the plant when necessary to reach the needs of customers
- 4) Maximize the quality and quantity of the recovered product.
- 5) Minimize the amount of spent or waste from the process. The objective is to approach -o- waste where technically feasible

The company has been successful in reaching these objectives and has been moderately successful financially. Todate, the following has been achieved:

- 1) Presently, recovering approximately 12,000,000 pounds of spent hydrocarbons for re-use as prime chemicals; value of about \$3,600,000 to the economy.
- 2) Approximately 4,000,000 pounds of the recovered material would have been incinerated. This would have generated in excess of 7,000,000 pounds of carbon dioxide. The value of the material saved from incineration is about \$1,800,000. When the cost of disposal is added to this, the savings to the economy is approximately \$3,300,000. ADI is presently operating at about 25% of its projected capacity. At full rate a significant improvement to both the environment and the economy will be realized; i.e. approximately a 28,000,000 pounds / year reduction in carbon dioxide emission and a savings of \$13,200,000 / year to the economy.

There are two major projects that have either been completed or are presently in operation that are worthy of discussion:

- First- Witco has been generating about 350,000 pounds / month of spent isopropyl alcohol containing quaternary ammonium salt (ingredient used in fabric softener) and water. This material was brought in under the variance issued by the NCDENR for recovery and returned to the originating plant. This is the only material that ADI has processed or handled using a variance. The first distillation produced a high quality isopropyl alcohol stream that was returned. The % of IPA recovered from the bottoms was not acceptable, so it is in storage waiting additional processing. This material is stored in rail road cars and two tanks. A steam line is being installed to heat the tanks so that the material can be readily pumped back to the plant for redistillation. The remaining bottoms will be either returned to Witco for disposal or sold as an ingredient in fabric softener; on other products; the recovered IPA will be returned as product.
- Second - An agreement was reached between ADI and Ciba Specialty Chemicals (the Additives Division) whereby ADI would separate an Octane-Tertiary Butyl Alcohol stream; the octane is returned to Ciba for reuse as a reactant and the tertiary butyl alcohol is purified for marketing as prime TBOH. Starting in August 1997, a large amount of the TBOH is going to

the company that manufactures catalyst from the TBOH and sells it to the Ciba plant generating the octane-TBOH stream. The balance of the TBOH starting early 1998 will go to another Ciba facility for use. This represents a very unique recycle of the same molecules. The only part of this project that was not accounted for or used productively was extraction water. Originally, this water was to be incinerated at Ciba's cost. ADI evaluated the water and realized that about 3-4 % of the material could be recovered as TBOH with the water being pure enough to ultimately be treated (not by ADI) and returned to ADI as cooling tower make-up. The proper permits were approved and issued by the county and state to allow this (the permit was signed on 12-1-97). As of 12-13-97 this recovery is in process. This will yield a reduction in waste in regards to this octane-TBOH stream in excess of 97%. The project has been ongoing since October, 1996.

The results obtained in the octane-TBOH project represent the objective that we place on all of our projects. We know that in some cases these extremely high recoveries can't be reached.

The material in the warehouse in the drums are part of this concept. ADI has always taken the approach that maximum efforts should be exerted before a material is wasted. Some has already been recovered; the remaining will be. The warehouse material can be broken down as follows:

- 1) Spent carbon - This material was used for color removal. It will be regenerated by steam and / or hot nitrogen stripping and re-used.
- 2) Spent molecular sieve 3A. This material is made up of spheres that have a clay binder. It tends to crumble in use and eventually produces excessive pressure drop. This material will be screened for re-use. The active portion of molecular sieves are aluminum silicate crystals that aggressively holds water; the remainder is clay.
- 3) Intermediate cuts from distillation. This material is fed back with the next incoming crude. Each time an intermediate cut is taken.
- 4) Off color product - This material is carbon treated, flashed or slowly blended off. The technique used depends on conditions existing during each run.
- 5) Column bottoms- This material is accrued until adequate amounts are available to justify final recovery. Sometimes a high boiling liquid (a pusher) might be required to complete the recovery.
- 6) Prime products in storage. These items are:
 - a) calcium sulfate (Dririte)
 - b) HCl
 - c) caustic
 - d) ring packing
 - e) molecular sieve (4A)
 - f) IPA (denaturant for the ethanol)
 - g) KOH (45%)
- 7) Isobutyl acetate / isobutyl alcohol. This is intermediate cuts from ester manufacture. This will be used to make pure isobutyl acetate.
- 8) Drums of dirt- This was from the floor and is not ADI's material
- 9) Ethylene Dichloride and Methanol- This product can be sold as is (if approved) or it will be redistilled to recover the methanol.

ADI strongly believes that our customers and the environment are best served by utilizing every reasonable and approved technique to minimize and (where possible) eliminate waste.

MEETING ATTENDANCE RECORD

SQG

Facility American Distillation Inc.

EPA ID NCR 000 001 651

Date December 17, 1997

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

Attending:	Representing:	Phone Number:
1. Linda Culpepper	NC Hazardous Waste Section	919/733-2178 Ext. 216
2. Doug Hogfield	"	910-771-4608 x 222
3. Larry D. Perry	"	919-733-2178 Ext. 213
4. Andy Simpson	ADI	910 371-0993
5. Larry Rosetti	ADI	910 371-0993
6. Will Olevi	ADI	910-371-0993
7. Bill Miller	NCAG	919-214-6982
8.		
9.		
10.		
11.		
12.		
13.		
14.		

ADI will submit information requested in Dec. 3 1997 correspondence by Jan. 2nd.

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

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

June 20, 1997



Wayne Gainous
Gainous Environmental
116 Town View Trail
Garner, North Carolina 27529

506 (23)

RE: Solid Waste Variance
Distillation of Alcohols
American Distillation
EPA Id # NCR 000 001 651

Dear Mr. Gainous:

This is in response to American Distillation, Inc.'s (ADI) letter requesting a solid waste variance under the provisions of 40 CFR 260.30(b), codified at 15A NCAC 13A .0103, for the distillation of isopropyl alcohol and methyl alcohol water mixtures. These materials are brought on-site for distillation and are sent back to the original generator for direct reuse. Incoming mixtures are tested using gas chromatography for quality control prior to unloading.

A piping system has been constructed to transfer these materials from railcars to ADI property housing the tank farm and distillation process. A vacuum tanker is available to respond to any potential releases. The tanker unloading area has been paved, but the railcar area does not have a paved/sealed surface. Manual release valves are used to drain rain water from the tank farm's cinderblock wall secondary containment to a sump and the water is then released rather than using as makeup water for the boiler. ADI maintains a contingency plan for emergency procedures in conjunction with North Brunswick and New Hanover County local response teams.

The Hazardous Waste Section hereby grants ADI a solid waste variance in accordance with 40 CFR 260.30(b), codified at 15A NCAC 13A .0103, for the time period of June 25, 1997 through June 25, 1998 provided the conditions are maintained as stated in past correspondence, including:

- a. The volume of used material on-site awaiting distillation may not exceed 50,000 gallons at any time;
- b. All materials will be shipped to and from the facility in accordance with the Department of Transportation requirements; and
- c. All materials will be managed on-site in accordance with all local/state/ federal fire codes.

P.O. Box 27687,
Raleigh, North Carolina 27611-7687
Voice 919-733-4996



FAX 919-715-3605
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American Distillation

File

General

~~REC~~
NCR 000 001 651

GAINOUS ENVIRONMENTAL
116 TOWN VIEW TRAIL
GARNER, N.C. 27529
TEL: (919) 662-8829



22

JULY 8, 1997

STATE OF NORTH CAROLINA
DIVISION OF SOLID WASTE MANAGEMENT
DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES
P.O. BOX 29603
RALEIGH, NORTH CAROLINA, 27611-7687
ATT: MR. JAMES A. CARTER

REFERENCE: SOLID WASTE VARIANCE (ISOBUTYL ALCOHOL)

DEAR MR. CARTER,

AMERICAN DISTILLATION, INC., WOULD LIKE TO REQUEST A VARIANCE FOR ISOBUTYL ALCOHOL. THIS IS COVERED UNDER 40 CFR 260.30 (b) AND 260.31. WE WOULD LIKE TO RECYCLE (RECLAIM) THIS MATERIAL AND RETURN IT TO THE ORIGINAL OWNER FOR REUSE.

ADI, NOW HAS A COMPANY THAT WOULD LIKE THEIR PRODUCT (ISOBUTYL ALCOHOL) TO BE RECLAIMED, THEN REUSED IN THEIR ORIGINAL PROCESS, THEREFORE ELIMINATING THE COST OF DESTROYING WHILE REPLACING IT WITH VIRGIN MATERIAL AND SUBSEQUENTLY REDUCING THE IMPACT TO OUR ENVIRONMENT.

YOUR CONSIDERATION AND PROMPT RESPONSE TO THIS REQUEST IS GREATLY APPRECIATED, AND SHOULD YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE DO NOT HESITATE IN CONTACTING ME.

SINCERELY,

H. Wayne Gainous, Sr.

H. WAYNE GAINOUS, SR.
ENVIRONMENTAL MANAGER

cc: ANDY SIMMONS, JR.
WILL OLIVER

I can't
tell what
this says, but
it has shown
in my in-box on
July 21, 1997
a full 10 days
after
stamped
(blurred)
m.

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

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

August 7, 1997



Wayne Gainous
Gainous Environmental
116 Town View Trail
Garner, North Carolina 27529

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RE: Solid Waste Variance
Distillation of Isobutyl Alcohol
American Distillation
EPA Id # NCR 000 001 651

Dear Mr. Gainous:

This is in response to American Distillation, Inc.'s (ADI) letter requesting a solid waste variance under the provisions of 40 CFR 260.30(b), codified at 15A NCAC 13A .0103, for the distillation of isobutyl alcohol. This material is brought on-site for distillation and is sent back to the original generator for reuse.

The Hazardous Waste Section hereby grants ADI a solid waste variance for isobutyl alcohol, in addition to the past variance for isopropyl and methyl alcohols, in accordance with 40 CFR 260.30(b), codified at 15A NCAC 13A .0103, for the time period of June 25, 1997 through June 25, 1998 provided the conditions are maintained as stated in past correspondence, including:

- a. The incoming mixture must be tested for quality control prior to unloading, and the original generator must directly reuse the distilled product;
- b. The volume of used material (including isobutyl, isopropyl and methyl alcohols) on-site awaiting distillation may not exceed 50,000 gallons at any time;
- c. All materials will be shipped to and from the facility in accordance with the Department of Transportation requirements; and
- d. All materials will be managed on-site in accordance with all local/state/ federal fire codes.

In addition, ADI must maintain compliance with all applicable local/state/ federal health and environmental program regulations including those implemented by the Division of Air Quality, Division of Water Quality, Division of Waste Management, Division of Coastal Management, and Occupational Safety and Health Division.

P.O. Box 27687,
Raleigh, North Carolina 27611-7687
Voice 919-733-4996



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Wayne Gainous, Sr.

August 7, 1997

Page 2

The variance will be re-evaluated within sixty (60) days prior to the June 25, 1998 expiration. If you should have any questions, please feel free to contact Linda Culpepper at (919) 733-2178 ext. 216.

Sincerely,

Daniel L. Bius
for

James A. Carter, Chief
Hazardous Waste Section

c: Flint Worrell
Larry Perry
Doug Holyfield
Central Files

rc: Dan Bius
Jill Burton
Linda Culpepper

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

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

April 2, 1997



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Wayne Gainous
Gainous Environmental
116 Town View Trail
Garner, North Carolina 27529

RE: Solid Waste Variance
Distillation of Alcohols
American Distillation
EPA Id # NCR 000 001 651

Dear Mr. Gainous:

We apologize for the delay in responding to your request to continue the solid waste variances issued on March 27, 1996, for the recycling of methyl and isopropyl alcohols. We are still considering the issues involved in the variance requirements, and appreciate your patience in working with us.

In the interim, we are extending the past solid waste variance for the methyl and isopropyl alcohol material an additional ninety (90) days to June 25, 1997. All the terms and conditions described in past correspondence regarding the management of these materials will remain in place during this extension period.

If you should have any questions, please feel free to contact Linda Culpepper at (919) 733-2178 ext. 216.

Sincerely,

James A. Carter, Chief
Hazardous Waste Section

c: Flint Worrell
Larry Perry
Doug Holyfield
Central Files

rc: Dan Bius
Jill Burton
Linda Culpepper

P.O. Box 27687,
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State of North Carolina
Department of Environment,
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Division of Waste Management

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



April 1, 1997

19

Tamara Risch
4th Civil Engineer Squadron/CC
1095 Peterson Avenue
Seymour Johnson AFB, NC 27531

Dear Ms. Risch:

This letter is in response to your January 13, 1997, request for information regarding a project to tie in aviation fuel holding tanks to a new treatment system.

If the entire system were hard-plumbed together, would we require a modification to our Part B Permit? If the holding tanks were not hard-plumbed to the treatment unit, would this require a modification to our permit?

If the system were hard-plumbed together, the aviation fuel and water accumulated in storage tanks due to condensation would not be considered spent materials but rather the mixture more closely fits the description of an off-spec commercial chemical product. Commercial chemical products are excluded from the definition of a solid waste when the contents are reclaimed. Per our conversation on March 10, 1997, you stated that any recovered fuel would be reclaimed and donated to Fort Bragg for use at their heat plant. Therefore, the aviation fuel and water would not be a solid waste and not subject to hazardous waste regulations, including permit modification requirements, since its original purpose was to be used as fuel. If the entire system were hard-plumbed together and no fuel was recovered, the wastewater would not be a solid waste until it leaves the treatment system. At that point, it would not be subject to hazardous waste regulations, but to regulations under the Clean Water Act.

If the entire system were not hard-plumbed together, the aviation fuel and water accumulated in the storage tanks would be stored in two (2) five-thousand gallon tanks. The tanks would be sampled when full and the mixture taken to the treatment system. Any recovered fuel would be reclaimed and donated to Fort Bragg for use at their heat plant. The aviation fuel and water accumulated in storage tanks are not spent materials and more closely fit the description of an off-spec commercial chemical product. They are excluded from the definition of a solid waste when the contents are reclaimed. Therefore, the aviation fuel and water would not be a solid waste and not subject to hazardous waste regulations, including permit modification requirements, since its original purpose was to be used as fuel. However, if the entire system were not hard-plumbed together and no fuel

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Raleigh, North Carolina 27611-7687
Voice 919-733-4996



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Page 2
Tammy Risch
April 1, 1997

was recovered, then the contents are not being reclaimed. Thus, the fuel and water would not be excluded from the definition of a solid waste. The fuel and water would be a solid waste and subject to hazardous waste determination.

Are there any Land Disposal Restriction issues we must manage under this proposed system and if so, what are they?

If the mixture is an off-spec commercial chemical product and reclaimed, then the mixture is not a hazardous waste and not subject to hazardous waste regulations including Land Disposal Restrictions. However, if it is not reclaimed, then it is subject to hazardous waste determination and may be subject to hazardous waste regulations, including Land Disposal Restrictions. Wastes subject to hazardous waste regulations must meet the Land Disposal Restriction Standards before leaving the tank treatment system.

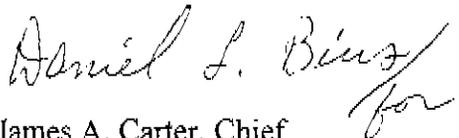
We would like to know if any of this additionally proposed process would require approval (from the State, City, etc.) regarding RCRA, CERCLA, CWA, or CAA.

Approval for discharging the wastewater into the sanitary sewer will be determined by the City of Goldsboro. As stated in the letter, approval for wastewater discharges into the sewer system is currently pending.

The proposed treatment system incorporates an air stripping process that may be subject to guidelines under the CAA. Please refer to your permit and the Air Quality Division at 919-733-3340 to determine any appropriate measures that the system may require.

Linda Raynor, in the Superfund Section, is being forwarded a copy of your request and this response for their consideration. If you have any further questions regarding RCRA regulations, please contact Shelia Askew at (919) 733-2178 ext. 206.

Sincerely,



James A. Carter, Chief
Hazardous Waste Section

cc:	Doug Holyfield	Sharron Rogers	rc:	Dan Bius	Jill Burton
	Dick Denton	Central Files		Kathrine O'Neal	Shelia Askew
	Linda Raynor			Linda Culpepper	

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

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



SOE

December 19, 1996

H. Wayne Gainous, Sr.
Environmental Manager
American Distillation, Inc.
1690 NE Royster Road
Leland, North Carolina 28451

18

RE: Solid Waste Variance (Isobutyl Alcohol)/Variance Modification (Isopropyl Alcohol)
American Distillation, Inc.
EPA Id # NCR 000 001 651

Dear Mr. Gainous, Sr.:

This is in response to your letter dated October 4, 1996, regarding solid waste variances. American Distillation, Inc. is requesting a solid waste variance for distilling isobutyl alcohol under the provisions of 40 CFR 260.30(b), codified at 15A NCAC 13A .0003, and requesting the existing variance for isopropyl alcohol be modified to allow the for marketing of the recovered product.

The existing solid waste variances (granted for the period of 3/27/96 - 3/27/97) for methyl and isopropyl alcohols are based on the arrangement where the generator of the material receives the product back for reuse. American Distillation, Inc. simply provides an off-site distillation service to an otherwise hazardous waste generator. The Hazardous Waste Section does not believe the current solid waste variance provisions are appropriate for commercial activities where the recycler is marketing the product to other customers.

Therefore, the variance for the isobutyl alcohol and the request to modify the existing variance for isopropyl alcohol are denied. We want to encourage recycling opportunities and invite you to discuss appropriate permit requirements with the Permitting Branch. If you have any questions regarding the permitting process, please feel free to contact Ms. Jill Burton, Permitting Branch Head, at (919) 733-2178 ext. 301.

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Voice 919-733-4996



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FILE - 6

AMERICAN DISTILLATION, INC.
1690 NE ROYSTER ROAD
LELAND, NORTH CAROLINA 28451
TEL (910) 371-0993 FAX (910) 371-2971

NCR 000 001 651

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OCTOBER 4, 1996

STATE OF NORTH CAROLINA
DIVISION OF SOLID WASTE MANAGEMENT
DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES
P.O. BOX 27687
RALEIGH, NORTH CAROLINA 27611-7687
ATTENTION: MR. JAMES A. CARTER

REFERENCE: SOLID WASTE VARIANCE (ISOBUTYL ALCOHOL)
VARIANCE MODIFICATION (ISOPROPYL ALCOHOL)

DEAR MR. CARTER,

AMERICAN DISTILLATION, INC., WOULD LIKE TO REQUEST A VARIANCE FOR ISOBUTYL ALCOHOL. THIS IS COVERED UNDER 40 CFR 260.30(B) AND 260.31. WE WOULD LIKE TO RECLAIM THE MATERIAL AND RETURN THE PRODUCT TO MARKET. ADI HAS A LOCAL COMPANY, JLM WITH OPERATIONS IN WILMINGTON, N.C. THAT WILL BE THE PRIMARY MARKET AGENT. SOUTH CHEM, LOCATED IN RALEIGH, N.C. WILL BE THE PRIMARY SUPPLIER OF THE CRUDE PRODUCT (ISOBUTYL ALCOHOL). AMERICAN DISTILLATION, INC. HAS A KNOWN MARKET FOR THIS PRODUCT WHICH IS COVERED UNDER 40 CFR 261.2 (e) (1) AND (f).

AMERICAN DISTILLATION, INC. HAS A VARIANCE FOR ISOPROPYL ALCOHOL WHICH WAS ISSUED BY YOUR DEPARTMENT (NORTH CAROLINA DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES). WE HAVE BEEN DISTILLING (RECLAIMING) ISOPROPYL ALCOHOL FOR OVER A YEAR AND ARE VERY PROUD OF THE QUALITY OF PRODUCT THAT WE RETURN TO OUR CLIENTS. WE ARE VERY THANKFUL TO NCDEHNR FOR IT'S HELP IN THE HANDLING OF OUR REQUEST.

ADI NOW HAS SEVERAL COMPANIES THAT WOULD LIKE AMERICAN DISTILLATION, INC. TO MARKET THEIR PRODUCT (ISOPROPYL ALCOHOL). OUR CURRENT VARIANCE CALL'S FOR THE PRODUCT (ISOPROPYL ALCOHOL) TO BE RETURNED TO IT'S ORIGINAL OWNER. IT IS IN THIS RESPECT THAT WE REQUEST A MODIFICATION TO OUR CURRENT VARIANCE WHICH WOULD ENABLE ADI TO ALSO MARKET ISOPROPYL ALCOHOL.

YOUR CONSIDERATION AND PROMPT RESPONSE TO THIS REQUEST IS GREATLY APPRECIATED. SHOULD YOU HAVE ANY FURTHER QUESTIONS REGARDING THIS MATTER, PLEASE DO NOT HESITATE IN CONTACTING ME.

RESPECTFULLY

H. Wayne Gainous, Sr.

H. WAYNE GAINOUS, SR.
ENVIRONMENTAL MANAGER

GAINOUS ENVIRONMENTAL
116 TOWNE VIEW TRAIL
GARNER, N.C. 27529
H. WAYNE GAINOUS, SR.
TEL: (919) 662-8829

ATTENTION: LINDA CULPEPPER

DEAR LINDA,

I AM FAXING YOU A COPY OF THE REQUEST FOR THE VARIANCE
FOR ISOBUTYL ALCOHOL AND A MODIFICATION FOR OUR VARIANCE
ON ISOPROPYL ALCOHOL. IF YOU SHOULD HAVE ANY QUESTIONS
REGARDING THIS PLEASE CALL ME @ (919) 662-8829.
THANK YOU FOR YOUR HELP IN THIS MATTER.

RESPECTFULLY,

H. Wayne Gainous, Sr.

H. WAYNE GAINOUS, SR.

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

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



SQA

September 18, 1996

John J. Butler
Parker, Poe, Adams & Bernstein
Post Office Box 389
One Exchange Plaza
Raleigh, North Carolina 27602-0389

(S) 16

RE: American Distillation Inc.
Leland, North Carolina
EPA Id # NCR 000 001 651

Dear Mr. Butler:

This is a follow-up to our September 3, 1996 letter regarding the waste determination of a n-octane, t-butyl alcohol (TBOH) wastestream from Ciba-Geigy that American Distillation Inc. is interested in reclaiming at its Leland, North Carolina site. The Hazardous Waste Section has received additional information from Ciba-Geigy on the manner in which the TBOH wastestream is generated, and their confirmation that the waste is characterized as a by-product.

In accordance with 40 CFR 261.2(c)(3), codified at 15A NCAC 13A .0006, by-products that would otherwise be considered hazardous waste due to one or more characteristics are exempt from being solid waste if they are reclaimed and not speculatively accumulated as indicated in 40 CFR 261.1(c)(8), codified at 15A NCAC 13A .0006. The Section agrees that the TBOH wastestream is a by-product, and would be exempt from regulation as a solid waste if it is reclaimed and not speculatively accumulated.

If you have any further questions, please contact Linda Culpepper at (919) 733-2178 ext. 216.

Sincerely,

James A. Carter, Chief
Hazardous Waste Section

cc:	Flint Worrell	Bob Barr, State of Alabama	rc:	Dan Bius
	Larry Perry	Tom Sciple, Ciba-Geigy		Linda Culpepper
	Doug Holyfield	Wayne Ganious, ADI		
	Judy Bullock	Central Files		

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Raleigh, North Carolina 27611-7687
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Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

JAN 10 1996
WASTE

14

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification B. Subsequent Notification (Complete item C)

C. Installation's EPA ID Number

NCR0000001651

II. Name of Installation (Include company and specific site name)

AMERICAN DISTILLATION INC

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1690 NE ROYSTER ROAD

Street (Continued)

City or Town

LELAND

State

NC

Zip Code

28451-

County Code

County Name

BRUNSWICK

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

PO BOX 400

City or Town

LELAND

State

NC

Zip Code

28451-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

CROOM

(First)

HUGH

Job Title

PLANT MANAGER

Phone Number (Area Code and Number)

910-371-1924

VI. Installation Contact Address (See Instructions)

A. Contract Address Location: Mailing Other

B. Street or P.O. Box

City or Town

LELAND

State

NC

Zip Code

28451-

VII. Ownership (See Instructions)

A. Name of installation's Legal Owner

ANDY J. SIMMONS JR

Street, P.O. Box, or Route Number

1690 NE ROYSTER RD. PO BOX 400

City or Town

LELAND

State

NC

Zip Code

28451-

Phone Number (Area Code and Number)

910-371-0993

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

(Date Changed)

Month

Day

Year

ID# _____
Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity		B. Used Oil Recycling Activities
<p>1. Generator (See Instructions)</p> <p><input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input checked="" type="checkbox"/> b. 100 to 1000 kg/mo (200-2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input checked="" type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify _____</p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input checked="" type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter Deferral</p> <p><input checked="" type="checkbox"/> 2. Small Quantity Exemption indicate Type or Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input checked="" type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Used Oil Fuel Marketer</p> <p><input type="checkbox"/> a. Marketer Directs Shipment of Used Oil to Off-Specification Burner</p> <p><input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</p> <p>2. Used Oil Burner - (Indicate Type(s) of Combustion Device(s))</p> <p><input type="checkbox"/> a. Utility Boiler</p> <p><input type="checkbox"/> b. Industrial Boiler</p> <p><input type="checkbox"/> c. Industrial Furnace</p> <p>3. Used Oil Transporter - (Indicate Type(s) of Activity(ies))</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility</p> <p>4. Used Oil Processor/Re-refiner - (Indicate Type(s) of Activity(ies))</p> <p><input type="checkbox"/> a. Process</p> <p><input type="checkbox"/> b. Re-refine</p>

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation generates. See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxic Characteristic (Use specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

B. Listed Hazardous Wastes. (See 40 CFR Part 261.24 for instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8		10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6

X. 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.

Signature 	Name and Official Title (Type or print) Andy J. Simmons, Jr. President	Date Signed 1-4-96
---------------	---	-----------------------

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

AMERICAN DISTILLATION, INC
P.O. BOX 400
1690 NE ROYSTER ROAD
LELAND, NORTH CAROLINA 28451
TEL (910) 371-0993 FAX (910) 371-2971



January 4, 1996

N.C. Department of Environmental, Health and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687
Attention: Angela Wise

REFERENCE: Notification of Regulated Waste Activity

Dear Ms. Wise,

This letter is a follow up of our conversation on January 4, 1996 concerning our Hazardous Waste Activities.

Enclosed you will find a Notification of Regulated Waste Activity, which we are requesting to change. We are now a Large Quantity Generator and would like to change to a Small Quantity Generator.

This decision was based on our meeting with Mr. (Flint) Worrell on January 3, 1996.

Your consideration and prompt response to this request is greatly appreciated and should you have any further questions regarding this matter, Please do not hesitate in contacting our office.

Respectfully,

H.W. Gainous, Sr.

H.W. Gainous, Sr.
Environmental Manager

File -6

cc: Dan Diner
Linda Cuttropa
Jill Austin

AMERICAN DISTILLATION, INC.
1690 NE ROYSTER RD.
LELAND, NORTH CAROLINA 28451
TEL (910) 371-0993 FAX (910) 371-2971

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MARCH 11, 1996

STATE OF NORTH CAROLINA
DIVISION OF SOLID WASTE MANAGEMENT
DEPARTMENT OF ENVIRONMENT, HEALTH
AND NATURAL RESOURCES
P.O. BOX 27687
RALEIGH, NORTH CAROLINA 27611-7687
ATTENTION: MR. JIM EDWARDS

RE: SOLID WASTE VARIANCE N-OCTANE TERT-BUTYL ALCOHOL

DEAR MR. CARTER,

AMERICAN DISTILLATION, INC. IS IN THE BUSINESS OF RECLAIMING ALCOHOLS AS YOU WELL KNOW. YOUR DEPARTMENT (DEHNR) HAS BEEN A GREAT HELP IN OUR EFFORTS TO SALVAGE RESOURCE MATERIALS.

IT IS IN THIS RESPECT THAT WE REQUEST A VARIANCE FOR N-OCTANE -TERT-BUTYL ALCOHOL. THIS IS COVERED UNDER 40 CFR 260.30 (B) AND 263.31 C (4).

ADI NOW HAS A COMPANY THAT WOULD LIKE THEIR PRODUCT (N-OCTANE-TERT-BUTYL ALCOHOL) TO BE RECLAIMED. THE N-OCTANE WILL BE RETURNED TO THE ORIGINAL OWNER TO BE REUSED IN THEIR PROCESS. THE T-BUTYL ALCOHOL WILL BE SOLD TO A SECOND COMPANY.

OUR RESEARCH LABORATORY IN GULFPORT, MISSISSIPPI HAS RAN SEVERAL TEST RUNS ON THIS PRODUCT. THE RECOVERY RATE IS AS FOLLOWS:

	WT.	%
OCTANE	33.0	%
T-BUTLY ALCOHOL	54.8	%
WATER	12.2	%

YOUR CONSIDERATION AND PROMPT RESPONSE TO THIS REQUEST IS GREATLY APPRECIATED. SHOULD YOU HAVE ANY FURTHER QUESTIONS REGARDING THIS MATTER, PLEASE DO NOT HESITATE IN CONTACTING OUR OFFICE.

RESPECTFULLY,

H. Wayne Gainous, Sr.

H.WAYNE GAINOUS, SR.
ENVIRONMENTAL MANAGER



Meeting Attendance Record

Facility American Distillation
EPA ID NC R 000 001651
Date February 26, 1990

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

Attending:	Representing:	Phone Number:
1. <u>Linda Culpepper</u>	<u>NC Hazardous Waste Section</u>	<u>(919) 733-2178 ext. 216</u>
2. <u>Don Bix</u>	<u>NC HWS</u>	<u>919-733-2178 X220</u>
3. <u>Jim Edwards</u>	<u>NC HWS</u>	<u>919-733-2178 X209</u>
4. <u>Wayne Gairous</u>	<u>ADI</u>	<u>(910) 371-0993</u>
5. <u>Andy Simmons</u>	<u>ADI</u>	<u>910-371-0993</u>
6. <u>Will Olive</u>	<u>ADI</u>	<u>910-371-0993</u>
7. <u>Larry D. Percy</u>	<u>NC Haz. Waste</u>	<u>919-733-2178</u>
8. _____		
9. _____		
10. _____		
11. _____		
12. _____		
13. _____		
14. _____		

File 6



cc: Dan
Cindy
Jill

11

AMERICAN DISTILLATION, INC.
1690 N.E. ROYSTER RD.
P.O. BOX 400
LELAND, NORTH CAROLINA 28451
TEL (910) 371-0993 FAX (910) 371-2971

FEBRUARY 25, 1996

N.C. STATE DIVISION OF SOLID WASTE
P.O. BOX 27687
RALEIGH, N.C. 27611-7687
ATTENTION: MR. JAMES A. CARTER

RE: SOLID WASTE VARIANCE FOR METHYL ALCOHOL

DEAR MR. CARTER,

AMERICAN DISTILLATION, INC. IS AN ENVIRONMENTAL CONSCIOUS COMPANY. WE ARE ACUTELY AWARE OF THE NECESSITY TO PROTECT THE ATMOSPHERE, WATER AND GROUND THAT WE LIVE IN AND ON. ALL OF OUR EFFORTS ARE PRECEDED BY STUDY OF ENVIRONMENTAL CONCERNS WHILE ATTEMPTING TO SALVAGE RESOURCE MATERIALS FURTHER SERVING OUR ENVIRONMENT.

WE ARE NOW IN THE BUSINESS OF RECLAIMING ETHYL AND ISOPROPYL ALCOHOL WHICH IS THEN REUSED WITHIN THE ORIGINAL PRIMARY PRODUCTION PROCESS, THEREFORE REDUCING IMPACT TO THE ENVIRONMENT.

IT IS IN THIS RESPECT THAT WE REQUEST A VARIANCE FOR METHYL ALCOHOL. THIS IS COVERED UNDER 40 CFR 260.30 (B) & 261.31. WE WOULD LIKE TO RECLAIM THE MATERIAL AND RETURN IT TO ITS ORIGINAL OWNER TO BE REUSED.

WE NOW HAVE A COMPANY THAT WOULD LIKE FOR THEIR PRODUCT (METHYLL ALCOHOL) TO BE RECLAIMED AND THEN REUSED IN THEIR ORIGINAL PROCESS, THEREFORE ELIMINATING THE COST FOR DESTROYING WHILE REPLACING IT WITH VIRGIN MATERIAL AND SUBSEQUENTLY REDUCING THE IMPACT TO THE ENVIRONMENT.

YOUR CONSIDERATION AND PROMPT RESPONSE TO THIS REQUEST IS GREATLY APPRECIATED AND SHOULD YOU HAVE ANY FURTHER QUESTIONS REGARDING THIS MATTER PLEASE, DO NOT HESITATE CONTACTING OUR OFFICE.

RESPECTFULLY,

H. Wayne Gainous, Sr.

H. WAYNE GAINOUS, SR.
ENVIRONMENTAL MANAGER

Linda C
RECEIVED
FEB 16 1996
HAZARDOUS WASTE
cc: Jill
Katherine
K

AMERICAN DISTILLATION, INC.
1690 N.E. ROYSTER RD.
LELAND, NORTH CAROLINA 28451
TEL (910) 371-0993 FAX (910) 371-2971

10

FEBRUARY 14, 1996

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT, HEALTH
AND NATURAL RESOURCES
DIVISION OF SOLID WASTE MANAGEMENT
P.O. BOX 27687
RALEIGH, N.C. 27611-7687
ATTN: MS. LINDA CULPEPPER

RE: SMALL QUANTITY BURNER EXEMPTION

DEAR MS. CULPEPPER,

THIS LETTER IS IN RESPONSE TO THE INFORMATION YOU REQUESTED
CONCERNING THE SMALL QUANTITY BURNER EXEMPTION REQUIREMENTS
IN 40 CFR 266.108 CODIFIED AT 15A NCAC 13A.0011. THE
FOLLOWING INFORMATION ADDRESS THE ISSUES IN QUESTION.

1. TESH = HA + HI - TR
 - A) HA= 50' (MEASURED)
 - B) TR= 10' (FORM USGS TOPO MAP)
 - C) TS= 450 DEGREES FAHRENHEIT (505 DEGREES K)
 - D) QS= 2.874 CFM = 1.3 M/3/SEC. (CALCULATED)

FROM 40 CFR 266 APPENDIX VI: HI = IM = 3.3'

TESH = 50' + 3.3' - 10' = 43.3' = 13.2M

EXEMPT QUANTITIES FOR
SMALL QUANTITY BURNER = 48 GALLONS/MONTH
EXEMPTION, WITH TESH = 13.2M
(PER 40 CFR 266.108)

2. NO, WE HAVE ONLY ONE BOILER.
3. BOILER FIRING RATE IS 8 mbtu/hr

1% ON BTU BASIS (A) 0.01 X 8 mbtu/hr = 80,000 btu/hr.

$$\frac{80,000 \text{ btu/hr}}{10,000 \text{ btu/lb}} = 8 \text{ lb/hr}$$

PAGE 2
FEBRUARY 14, 1996
MS. CULPEPPER

1% ON MASS BASIS (B) $0.01 \times 757 \text{ lb/hr} = 7.6 \text{ lb/hr}$
COMPARED TO

(C) BECAUSE 7.6 LESS THAN 8, THE MAXIMUM
FIRING RATE FOR HAZARDOUS MATERIALS IS
7.6 lb/hr

SUMMARY: (i) MAXIMUM FIRING RATE FOR HAZARDOUS
MATERIAL = 7.6 lb/hr

(ii) MAXIMUM AMOUNT OF HAZARDOUS MATERIAL
BURNED = 48 gallons/month

4. YES, THE BURN MATERIAL WILL ONLY BE STILL BOTTOMS
FROM THE DISTILLATION OF ISOPROPYL/WATER MIXTURE AND
ETHANOL WASTE STREAMS.

YOUR CONSIDERATION AND PROMPT RESPONSE IN THIS REQUEST IS
GREATLY APPRECIATED. SHOULD YOU HAVE ANY FURTHER QUESTIONS
PLEASE DO NOT HESITATE IN CONTACTING OUR OFFICE.

RESPECTFULLY,

H. Wayne Gainous, Sr.

H. WAYNE GAINOUS, SR.
ENVIRONMENTAL MANAGER

File 6



cc: Dan
Jill
Coke

AMERICAN DISTILLATION, INC.
1690 NE ROYSTER RD.
LELAND, NORTH CAROLINA 28451
TEL (910) 371-0993 FAX (910) 371-2971

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FEBRUARY 14, 1996

STATE OF NORTH CAROLINA
DIVISION OF SOLID WASTE MANAGEMENT
DEPARTMENT OF ENVIRONMENT,
HEALTH AND NATURAL RESOURCES
P.O. BOX 27687
RALEIGH, NORTH CAROLINA 27611-7687
ATTN: MR. JIM EDWARDS

RE: DISTILLATION (PRODUCT - 40% ETHANOL ALCOHOL, 50% ETHYL
ETHER AND 10% WATER).

DEAR MR. EDWARDS,

THIS LETTER IS A FOLLOW UP OF OUR CONVERSATION ON DECEMBER
11, 1995 ABOUT THE DISTILLATION OF ETHANOL, ETHYL ETHER AND
WATER. DURING THE CONVERSATION, I ASKED IF YOUR
DEPARTMENT (N.C. DEHNR) WOULD GRANT AMERICAN DISTILLATION,
INC. APPROVAL TO DISTILL THIS PRODUCT. I EXPLAINED THAT THE
PRODUCT WOULD PRODUCE 40% ETHANOL ALCOHOL AND 50% ETHYL ETHER
WITH THE REMAINING 10% BEING WATER. THE PRODUCTS TO BE
RECLAIMED, ETHANOL ALCOHOL AND ETHYL ETHER WILL BE RETURNED.

IF YOU WOULD PLEASE SEND ME A LETTER OF VERIFICATION OR
APPROVAL FOR MY FILES I WOULD GREATLY APPRECIATE IT. THANK
YOU VERY MUCH FOR YOUR ASSISTANCE IN THIS MATTER.

RESPECTFULLY,

H. Wayne Gainous, Sr.
H. WAYNE GAINOUS, SR.
ENVIRONMENTAL MANAGER

*not returned
to original person.*

AMERICAN DISTILLATION, INC.
1690 NE ROYSTER ROAD
P.O. BOX 400
LELAND, NORTH CAROLINA 28451
TEL (910) 371-0993 FAX (910) 371-2971



Hazardous Waste Section
Division of Solid Waste Management
Department of Environment, Health and Natural Resources
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Attention: Mr. Jim Edwards

RE: Regulated Waste Acticity

Dear Mr. Jim Edwards,

This letter is a follow up to my conversation with Ms. Linda Culpepper on November 29, 1995, reference a letter stating that American Distillation, Inc. (ADI) is permitted to burn bottoms by North Carolina Department of Environment, Health and Natural Resources. Ms. Culpepper recommended that I send you a letter stating our request.

American Distillation, Inc. has a active EPA ID# NCR000001651, RCRA Classification and also Air Permit #7627.

ADI is not in the operations of burning bottoms yet, but are working on a Stream within North Carolina with the hope to bring Ethyl Alcohol on site to be reclaimed. Without the bottoms, we cannot at this point perform the analysis and calculations that are needed for notification and approval.

ADI is a young Company and is very environmentally aware of Emmisions Control and all notifications that we should send to you.

Your consideration and prompt response in this request is greatly appreciated. Should you have any further questions regarding this matter, please do not hesitate in contacting our office.

Respectfully,

H. Wayne Gainous, Sr.

H. Wayne Gainous, Sr.
Environmental Manager

H-U-B

X-B

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

November 1, 1995

AMERICAN DISTILLATION INC
PO BOX 400
LELAND NC 28451

RE: EPA ID No.: NCR000001651

Dear Sir:

Based on information received by this office for the site identified with the above EPA ID number, the State has accepted and processed the change in RCRA classification or information for the above listed site.

Your EPA ID number is active.

Current computer record of your facility contains following information:

(X Indicates Operational Status of Your Facility)

X LARGE GENERATOR	- SMALL QNTY. GENERATOR
- TRANSPORTER	- TREATER
- STORER	- DISPOSER

Company Name:	AMERICAN DISTILLATION INC
Owner:	ANDY SIMMONS
Owner Address:	1690 NE ROYSTER RD PO BOX 400
City, St. & ZIP:	LELAND NC 28451
Contact:	CROOM HUGH
Phone Number:	(910)371-1924
Location Addr.:	1690 NE ROYSTER RD
City, St. & ZIP:	LELAND NC 28451

Please verify the above computer information. Please notify us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status, namely Company's Name, Ownership, Address, Contact, or Telephone.
Your EPA ID number is currently active.

Sincerely,

R.J. Edwards, Administrative Officer

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone: 3605-3605

An Equal Opportunity Affirmative Action Employer

50% recycled/ 10% post-consumer paper

CC: FLINT WORRELL

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

SEP 28 1995

7

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification

B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

NC R00000001651

II. Name of Installation (Include company and specific site name)

AMERICAN DISTILLATION INC

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1690 NE ROYSTER ROAD

Street (Continued)

City or Town

LELAND

State

Zip Code

NC 28451-

County Code

County Name

BRUNSWICK

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

PO BOX 400

City or Town

LELAND

State

Zip Code

NC 28451-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

CROOM

(First)

HUGH

Job Title

PLANT MANAGER

Phone Number (Area Code and Number)

910-371-1924

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing Other

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

ANDY SIMMONS

Street, P.O. Box, or Route Number

1690 NE ROYSTER RD. PO BOX 400

City or Town

LELAND

State

Zip Code

NC 28451-

Phone Number (Area Code and Number)

910-371-0993

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

(Date Changed)
Month Day Year

ID - For Official Use Only									

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity		B. Used Oil Recycling Activities
<p>1. Generator (See Instructions)</p> <p><input checked="" type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (200-2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input checked="" type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify</p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter Deferral</p> <p><input type="checkbox"/> 2. Small Quantity Exemption</p> <p>Indicate Type of Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Used Oil Fuel Marketer</p> <p><input type="checkbox"/> a. Marketer Directs Shipment of Used Oil to Off-Specification Burner</p> <p><input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</p> <p>2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)</p> <p><input type="checkbox"/> a. Utility Boiler</p> <p><input type="checkbox"/> b. Industrial Boiler</p> <p><input type="checkbox"/> c. Industrial Furnace</p> <p>3. Used Oil Transporter - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility</p> <p>4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Process</p> <p><input type="checkbox"/> b. Re-refine</p>

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an ID number; See Instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. 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.

Signature <i>James A. Sellers</i>	Name and Official Title (Type or print) JAMES A. SELLERS PRES. vice	Date Signed 9/26/95
--------------------------------------	--	------------------------

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

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



January 23, 1996

Wayne Gainous
~~American Distillation~~
1690 N.E. Royster Road
Post Office Box 400
Leland, North Carolina 28451

6

RE: Small Quantity Burner Regulations

Dear Mr. Gainous:

Our office has reviewed the information you supplied to us (letter dated January 15, 1996) regarding the small quantity burner exemption requirements in 40 CFR 266.108, codified at 15A NCAC 13A .0011. The following information must be provided before we can determine if the exemption requirements will be met:

1. A TESH value of 60 ft was stated which equals 18.32 meters. Please provide the figures used to calculate the TESH value, including stack gas flow rate and exhaust temperature used to find H1 defined by Appendix VI.

$$\text{TESH} = \text{Ha} + \text{H1} - \text{Tr}$$

Ha = Actual physical stack height

H1 = Plume rise as determined by Appendix VI of 40 CFR 266
as a function of stack flow rate and stack gas exhaust temperature

Tr = Terrain rise within five kilometers of the stack

Indicate how the values were derived, i.e. actual measurements, estimations based on engineering designs, theoretical calculations. Ensure that the proper units are used in the calculations.

2. Is more than one boiler used to burn hazardous waste? If yes, provide the values for the parameters used to determine the burn limit in accordance with 40 CFR 266.108(c), codified at 15A NCAC 13A .0011.
3. Provide the maximum firing rate (design or actual) of the boiler. The maximum hazardous waste firing rate cannot exceed at any time 1 percent of the total fuel requirements on a total heat input or mass input basis, whichever results in the

Wayne Ganious
January 23, 1996
Page 2

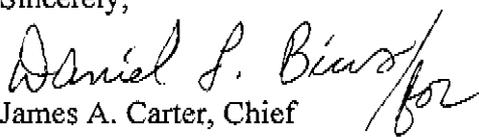
lower mass feed rate of the hazardous waste. To demonstrate compliance with this requirement, please provide both sets of calculations and the values used to calculate the maximum feed rate on both a heat and mass basis, and state the allowable monthly rate designated by the table in 40 CFR 266.108.

The density or specific gravity of both the hazardous waste and the other fuel(s) may be needed if you need to convert from a calculated firing rate of lbs/hour to gallons/hour in order to ensure that the maximum monthly rate as determined from the table is not exceeded.

4. Is the burn material only still bottoms from the distillation of the isopropyl/water mixture and ethanol wastestreams? If not, please describe the source of the burn material.

Once you submit the above information, we will review the calculations as soon as possible. If you have any questions, please feel free to contact Linda Culpepper or Katherine O'Neal at (919) 733-2178 ext. 216 and 227.

Sincerely,


James A. Carter, Chief
Hazardous Waste Section

lmc/distill.

cc: Flint Worrell
Central Files

rc: Dan Bius
Jill Burton
Katherine O'Neal
Linda Culpepper

AMERICAN DISTILLATION INC.

Central File
General

Corporate Office
1690 N.E. Royster Rd.
P.O. Box 400
Leland, NC 28451
(910) 371-0993
FAX (910) 371-2971

SEP 25

208 Rustic Drive
Carson, VA 23830-8823
(804) 246-8505

(4)

SEPTEMBER 20, 1995

N. C. STATE DIVISION OF SOLID WASTE
P.O. BOX 27687
RALEIGH, N.C. 27611-7687
ATTENTION: MS. LINDA CULPEPPER

DEAR MS. CULPEPPER,

I WOULD LIKE TO TAKE THIS OPPORTUNITY TO EXPRESS MY SINCERE THANKS AND GRATITUDE, FOR YOUR HANDLING OF OUR REQUEST FOR A VARIANCE FOR ISOPROPYL ALCOHOL.

YOUR EFFORTS WERE GREATLY APPRECIATED IN THE EXPEDITIOUS MANNER YOU HANDLED THIS MATTER. I CAN CERTAINLY SAY THAT YOU ARE A TRUE RESOURCE, NOT ONLY TO YOUR DEPARTMENT, BUT ALSO TO COMPANIES WISHING TO BETTER SERVE THE ENVIRONMENT.

AMERICAN DISTILLATION, INC. WILL TAKE A LEADING ROLE IN SEEKING OUT CRUDE FROM FACILITIES WITHIN NORTH CAROLINA AND I HOPE TO PERSONALLY WORK WITH YOU IN THE FUTURE

RESPECTFULLY,

H. Wayne Gainous

H. WAYNE GAINOUS
ENVIRONMENTAL MANAGER

HWG/th

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



*General
American
Distillation*

③

September 14, 1995

Wayne Gainous
American Distillation
1690 N.E. Royster Road
Post Office Box 400
Leland, North Carolina 28451

RE: Solid Waste Variance

Dear Mr. Gainous:

This is in response to your letter dated July 13, 1995, and subsequent meeting with Dan Bius and Linda Culpepper of my staff regarding a solid waste variance for isopropyl alcohol. You have requested the variance under the provisions of 40 CFR 260.30(b), codified at 15A NCAC 13A .0003, which states that on a case-by-case basis recycled materials may not be considered solid waste if the materials are reclaimed and then reused within the original production process in which they were generated. The determination is based on the provisions outlined in 40 CFR 260.31(b), codified at 15A NCAC .0003.

American Distillation, Inc. is proposing to bring a mixture of approximately 75% isopropyl alcohol and 25% water on-site, run it through its distillation system, and resell the isopropyl alcohol to the original client for direct reuse. Shipments will be segregated so that each client's material will be returned. A waste determination will be conducted on the solid waste generated from the distillation process to see if it is hazardous waste or not. If the waste is determined to be a hazardous waste, American Distillation, Inc. will ensure the waste is shipped to a properly permitted hazardous waste treatment/storage/disposal facility. Regardless of its classification, the client will be consulted as to where the waste generated from its material will be sent prior to the waste leaving American Distillation, Inc.

The current proposed supplier of the crude isopropyl alcohol is not located in North Carolina. American Distillation, Inc. will actively seek crude from facilities within North Carolina. In addition, at no time will the volume of crude on-site awaiting distillation exceed 50,000 gallons. All materials shipped to and from the facility will be done in accordance with the Department of Transportation requirements. All materials managed on-site will be done in accordance with all local/state/federal fire codes. You have indicated that your air quality permit will not need to be modified to conduct this process.

Wayne Gainous
Spetember 14, 1995
Page 2

Based on the previous information and conditions, the Hazardous Waste Section hereby issues a variance for the isopropyl alcohol/water mixture for a period of one year. The variance will be reevaluated for reissuance sixty (60) days prior to the end of the variance expiration.

If you have any questions, please give Linda Culpepper a call at (919) 733-2178 Ext. 216.

Sincerely,



James A. Carter, Chief
Hazardous Waste Section

cc: Dan Bius
Larry Perry
Flint Worrell
Bobby Nelms
Doug Holyfield
Keith Masters
Linda Culpepper
DEM Air Quality, Wilmington Regional Office
Central Files - general

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



AMERICAN DISTILLATION INC
PO BOX 400
LELAND NC 28451

NCR000001651

RE: EPA ID NO. _____
Dear Sir:

Listed above is your EPA ID number which has been assigned by the EPA. As a Small Generator, you should be familiar with NC Hazardous Waste Management Regulations 15A NCAC 13A .0002 Definitions; contained in 40 CFR 260.10 (Subpart B), 15A NCAC 13A .0006 Identification and Listings of Hazardous Waste; contained in 40 CFR 261.1 (Subpart A-D) and 15A NCAC 13A .0007 Standards for Hazardous Waste Generations; contained in 40 CFR 262.10 - 262.40 (Subpart A-D).

Effective January 1, 1986, all handlers of hazardous waste were required by G.S. 130A-294.1 to pay an annual fee. The above rules were adopted November 13, 1985 as authorized by G.S. 130A-294(a)(7) which was ratified July 3, 1985. Revised by House Bill 2623, ratified on the 29th day of June, 1988 by the General Assembly of the State of North Carolina. You will be billed for the Annual Fee at the beginning of the State Fiscal year in July.

You can contact the Hazardous Waste Management Section at (919) 733-2178 for information.

NCSU provides a training program for generators which you may want to attend. Call Mac McKenzie or Kathryn Murray at 919-515-2261 or write to the Office of Continuing Education and Professional Development, P.O. Box 7401, McKimmon Center, N.C. State University, Raleigh, NC 27695-7491.

You will be inspected at a future date to insure compliance with the above rules. To obtain a complete copy of rules contact the Hazardous Waste Management Section, Division of Solid Waste Management, PO Box 27687, Raleigh, NC 27611-7687. There is a \$16.00 printing charge for a complete copy of the rules.

Sincerely,

R.J. Edwards, Administrative Officer
Division of Solid Waste Management

cc:

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

MAY 18 1995

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification

B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

NCR0000001651

II. Name of Installation (Include company and specific site name)

AMERICAN DISTILLATION INC

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1690 NE ROYSTER ROAD

Street (Continued)

City or Town

LELAND

State

NC

County Code

County Name

BRUNSWICK

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

PO BOX 400

City or Town

LELAND

State

NC

Zip

28451-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

CROOM

(First)

HUGH

Job Title

PLANT MANAGER

Phone Number (Area Code and Number)

910-371-1924

VI. Installation Contact Address (See Instructions)

A. Contract Address
Location Mailing Other

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

ANDY SIMMONS

Street, P.O. Box, or Route Number

1690 NE ROYSTER RD. PO BOX 400

City or Town

LELAND

State

NC

Zip Code

28451-

Phone Number (Area Code and Number)

910-371-0993

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

(Date Changed)

Month Day Year

Contact:
Wayne Gainous
per phone call
7-20-95
910-371-0993

ID - For Official Use Only									

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity		B. Used Oil Recycling Activities
<p>1. Generator (See Instructions)</p> <p><input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input checked="" type="checkbox"/> b. 100 to 1000 kg/mo (200-2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input checked="" type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify</p> <p>_____</p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see Instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter Deferral</p> <p><input type="checkbox"/> 2. Small Quantity Exemption</p> <p>Indicate Type of Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Used Oil Fuel Marketer</p> <p><input type="checkbox"/> a. Marketer Directs Shipment of Used Oil to Off-Specification Burner</p> <p><input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</p> <p>2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)</p> <p><input type="checkbox"/> a. Utility Boiler</p> <p><input type="checkbox"/> b. Industrial Boiler</p> <p><input type="checkbox"/> c. Industrial Furnace</p> <p>3. Used Oil Transporter - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility</p> <p>4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Process</p> <p><input type="checkbox"/> b. Re-refine</p>

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have any number. See Instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. 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.

Signature <i>Janesa Sellers</i>	Name and Official Title (Type or print) VICE PRESIDENT JANESA SELLERS	Date Signed 7/14/95
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XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)