

EW  
7/2/01  
(2)

RECEIVED  
JUL 10 2001  
BY: *[Signature]*

RCRIS: EVALUATION Add/Update

Evaluation data:  
New: Change: Delete:

EPA ID#: NCR000001164  
Facility name: CR Industries City: Franklin  
Responsible Agency: S

Date of Evaluation: 14 Jun 2001

Resp. Branch: 01  
Resp. Person: 030/B. Burch

Type of Evaluation: CSE

Reason of Eval.: 01  
Evaluation Comment: In Compliance. The violation has been corrected.

12234557897  
AUG 2001  
ENTERED  
RCRIS

SUPERVISOR'S NOV TRACKING INFORMATION

Type: CSE  
Initial Inspection Date: 14 Jun 2001  
Docket number: 2001-151  
Reinsptdate: 27 Jun 2001

COMMENTS: In Compliance. The violation has been corrected.

VIOLATION DATA: New: Change: Delete:

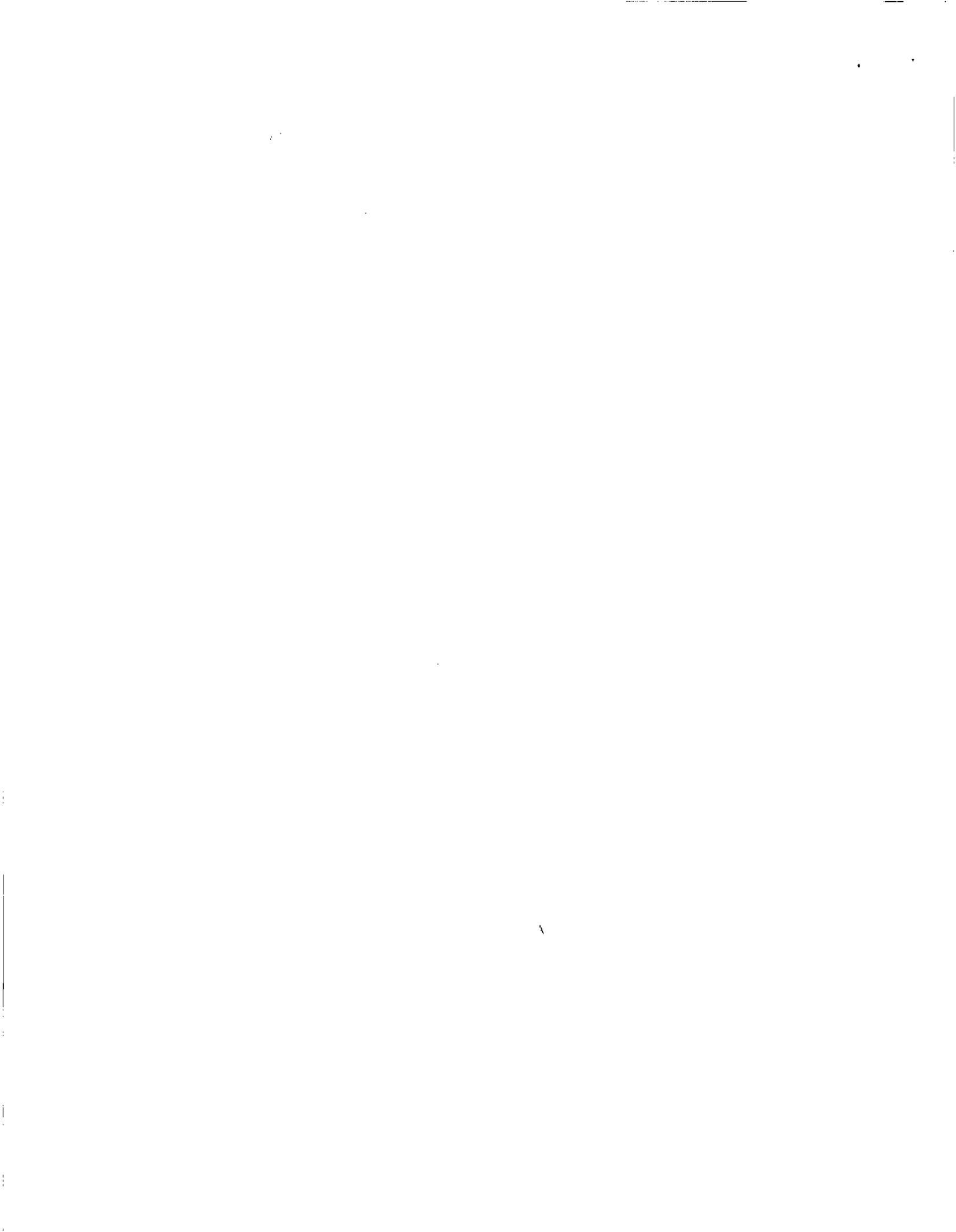
EPA ID#: NCR000001164

Facility name: CR Industries City: Franklin

Resp. Branch: 01  
Resp. Person: 030/B. Burch

1. date determined: 14 Jun 2001  
Area: GPT  
Class: 120  
Regulation: 40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 - Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Scheduled Response: 16 Jul 2001  
Date resolved: 27 Jun 2001



Violation Comment: CR Industries is in violation of 40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 in that they failed to maintain and operate the facility in order to prevent any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, releases of hazardous waste were observed on two 5-gallon containers being used to accumulate hazardous waste in the mix station of the storage room. In order to correct the violation, the facility must clean releases of hazardous waste off the containers, and ensure that future releases of hazardous waste are immediately addressed.

REINSPECTION: The facility submitted documentation indicating that new containers are being used for the satellite accumulation of waste generated in the mix room. Additionally, the facility contact issued a memo to supervisors discussing the requirement of keeping satellite containers clean. The facility corrected the violation.

2. date determined: 14 Jun 2001  
Area:  
Class:  
Regulation:

Scheduled Response:  
Date resolved: 27 Jun 2001

Violation Comment:

3. date determined: 14 Jun 2001  
Area:  
Class:  
Regulation:

Scheduled Response:  
Date resolved: 27 Jun 2001

Violation Comment: \*comment3

4. date determined: 14 Jun 2001  
Area:  
Class:  
Regulation:

Scheduled Response:  
Date resolved: 27 Jun 2001

Violation Comment:



REINSPECTION RCRA FACILITY

27 Jun 2001

1. FACILITY INFORMATION CR Industries  
324 Industrial Park Road  
Franklin 28734  
NCR000001164
2. FACILITY CONTACT Mr. Heath Talley  
(828) 524-8444
3. SURVEY PARTICIPANTS Documentation submitted in lieu of an inspection.
4. DATE OF REINSPECTION 27 Jun 2001
5. PURPOSE OF REINSPECTION

To determine compliance with the NOV, Docket Number 2001-151, dated, 14 Jun 2001.

6. FACILITY DESCRIPTION

CR Industries (Chicago Rawhide) is a manufacturer of rubber oil seals and gaskets for after market automobile maintenance. Processes at the facility include extruding, milling, prepping, molding and painting. The facility uses injection and compression molding to form the gaskets and seals. Hazardous wastes are generated from the cleaning of the gaskets and seals, and cleaning of spray booth guns.

Manifests were on-site and available for review. Manifests indicate that Ashland Distribution Corporation (NCD061263315), Safety Kleen Systems (ILD984908202), and Wills Trucking (OHD068913409) were used as transporters. Designated TSDF's were listed as Ashland Distribution Corporation (NCD061263315), and Safety Kleen Systems (SCD981031040). Wastes generated by the facility are a D001/F003/F005/D035 waste flammable liquid (mek, xylene, toluene, ethyl acetate), a D035/F003/F005 hazardous waste solid, D009 waste mercury (light containing mercury), and D008/D002 waste batteries. All manifests were signed by the designated TSDF. I discussed the universal waste policy for the lcm's and batteries.

According to records at the facility, hazardous waste training is conducted on an annual basis. The facility maintains records showing job titles and job descriptions for positions related to hazardous waste management.

The facility maintains a written contingency plan. The plan complies with the large generator requirements. Sprinklers, and extinguishers are used for fire suppression. Spill cabinets consist of booms, pigs, and absorbant. The facility has made arrangements with the local emergency responders.

Satellite storage containers are maintained in the mix station in the storage room (two 5-gal), and the large diameter seal area (two 5-gal, and two 10-gal). Both containers in the mix station had releases. All containers were labeled, and closed.

The facility maintains a <180-day storage area in the storage room. The area is surrounded by a dike. Extinguishers, and a dry chemical sprinkler system are located in the area. Radios are used for communication. At the time of the inspection, there were two 55-gallon containers in storage. Both containers were labeled, dated, and closed. No releases were observed on the containers.

**REINSPECTION:**

The facility submitted documentation indicating that new containers are being used for satellite accumulation in the mix room. Additionally, the facility contact has issued a memo to supervisors regarding keeping the containers clean. Based on the information provided the facility has corrected the violation. The facility is in compliance.

**7. FOLLOW UP INSPECTION**

The reinspection found the facility to be in compliance with the NOV dated 14 Jun 2001, docket#, 2001-151. The initial inspection found the facility in violation of the following:

40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 - Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. CR Industries is in violation of 40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 in that they failed to maintain and operate the facility in order to prevent any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, releases of hazardous waste were observed on two 5-gallon containers being used to accumulate hazardous waste in the mix station of the storage room. In order to correct the violation, the facility must clean releases of hazardous waste off the containers, and ensure that future releases of hazardous waste are immediately addressed.

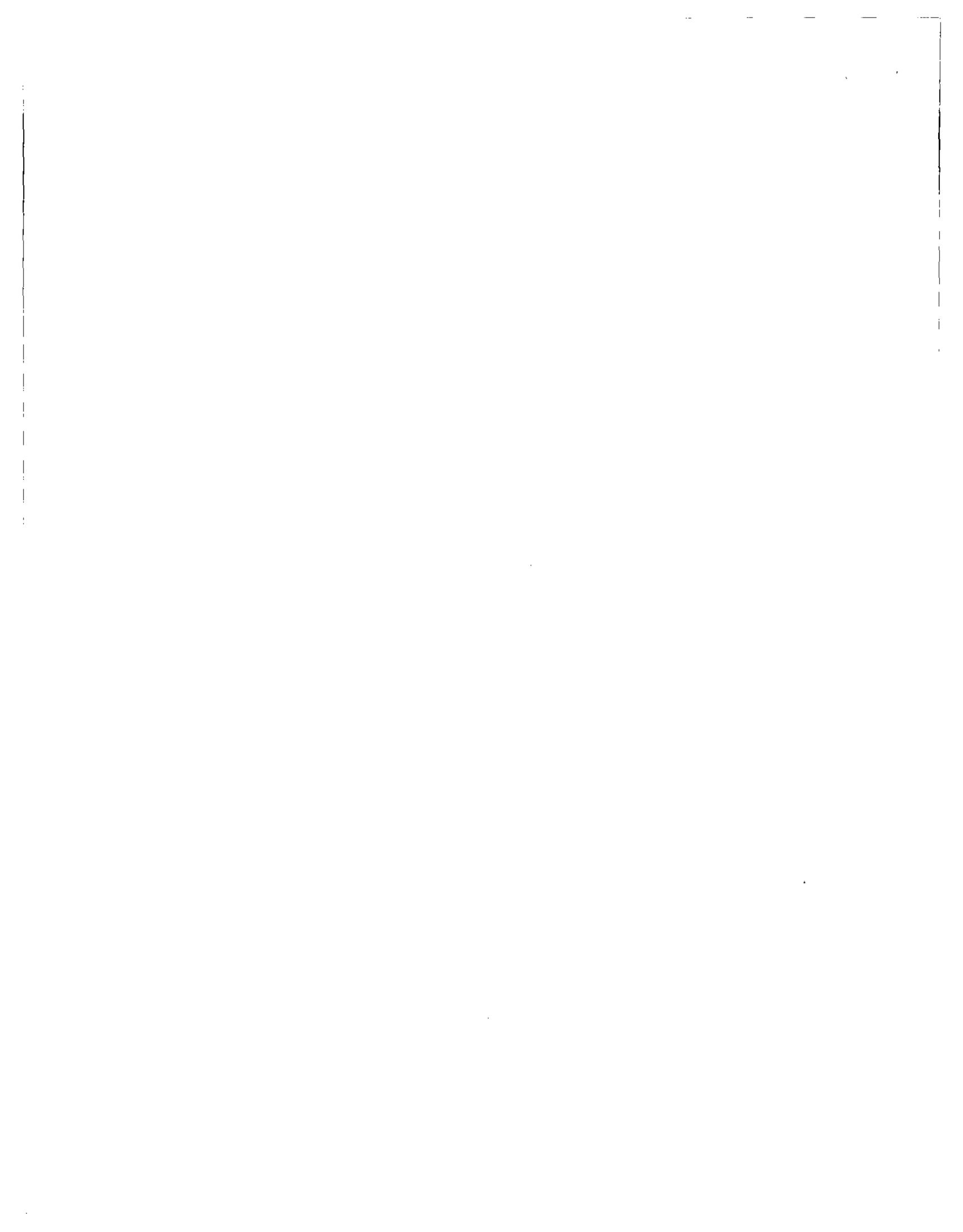
**REINSPECTION:** The facility submitted documentation indicating that new containers are being used for the satellite accumulation of waste generated in the mix room. Additionally, the facility contact issued a memo to supervisors discussing the requirement of keeping satellite containers clean. The facility corrected the violation.

J. P. [Signature]  
Inspector

6/23/01  
Date

sent by mail  
Facility contact

\_\_\_\_\_  
Date



# Chicago Rawhide

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Manufacturing

Franklin, NC  
USA

June 20, 2001

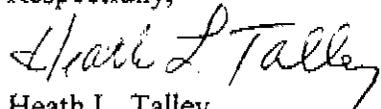
NCDENR-Hazardous Waste Section  
59 Woodfin Place  
Asheville, N.C. 28801  
Attention: Brent Burch

*Re: Docket# 2001-151*

Dear Mr. Burch:

I am writing to you in regards to the notice of violation which I received today as a result of your June 14, 2001 inspection. I have attached three items of documentation to show you that we have taken the necessary steps to elevate the problem which you pointed out; those attached items are listed below. If you have any questions as to the specifics of how we handled the problem please let me know as soon as you get a chance. Thank you for your time.

Respectfully,

  
Heath L. Talley  
Human Resources Manager  
Chicago Rawhide- Franklin Plant

cc: SKF Group  
File

**Attachments:**

- 1) Copy of email sent to Brent Burch on 06/18/01 @ 3:21 p.m.
- 2) Copy of memo to Supervisors and Plant Manager's Staff notifying them of the problem.
- 3) Copy of Purchase Order showing where new containers and drum funnel were purchased.

Heath L Talley  
06/18/2001 03:21 PM

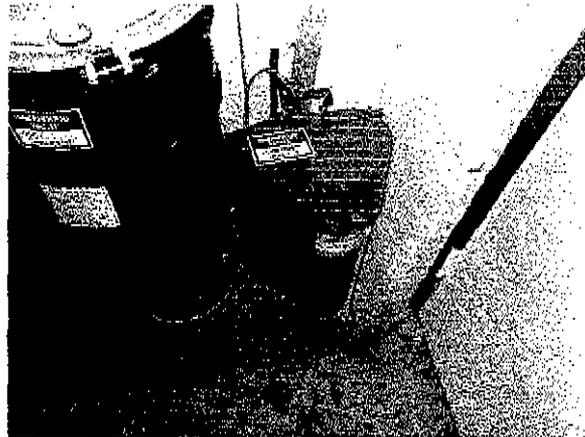
*Also copied  
Ray Schroll and Vastina  
Lepore*

To: Brent.Burch@ncmail.net  
cc: J D Burris/ELG/SKF - *Plant manager*  
Subject: Citation

Brent,

I have attached pictures of new containers that we have purchased and placed into operation as of today. I have sent a memo to all Supervisors and Managers in regards to the cleanliness of the containers. I will also be revising our QS-9000 Hazardous Waste work instruction to include container cleanliness. Please let me know if you have any questions. Thanks!

Heath L. Talley  
HR Manager  
Chicago Rawhide- Franklin Plant



Heath L Talley  
06/18/2001 03:21 PM

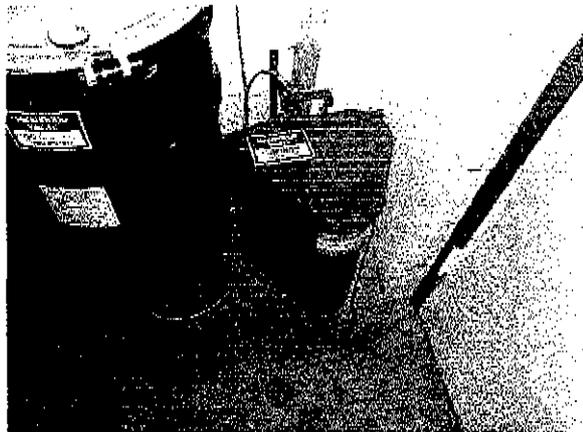
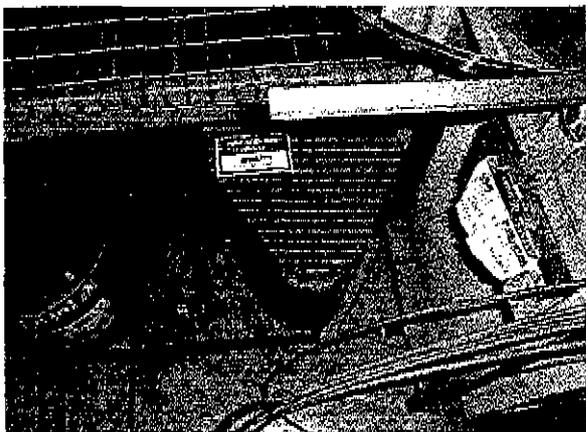
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HR Manager  
Chicago Rawhide- Franklin Plant



# Chicago Rawhide

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Manufacturing

Franklin, NC  
USA

June 20, 2001

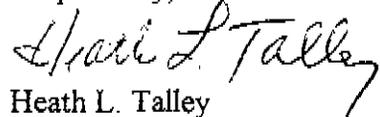
NCDENR-Hazardous Waste Section  
59 Woodfin Place  
Asheville, N.C. 28801  
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*Re: Docket#2001-151*

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Human Resources Manager  
Chicago Rawhide- Franklin Plant

cc: SKF Group  
File

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- 3) Copy of Purchase Order showing where new containers and drum funnel were purchased.*



New Atom Funnel  
secured latch



liquid waste  
container  
for work bench



Chicago Rawhide

Interoffice letter

June 18, 2001

**To: All Supervisors**  
**cc: J.D. Burris, Staff, Engineering, NCDENR**  
**From: Heath Talley**

*Reference: Satellite Accumulation Containers*

On Thursday, June 14th, the Franklin Plant received an unannounced visit from the North Carolina Department of Natural Resources, Hazardous Waste Section. The purpose of this visit was to audit our Hazardous Waste Management System and to make sure that we are in compliance with state and federal hazardous waste guidelines.

Overall the audit went pretty well. All of our paperwork, training records, etc..., were in order, we did however, receive one citation from the state. The citation that we received was on our satellite accumulation containers that we have located throughout the plant. The citation that was issued was in regards to the cleanliness of the outside of the containers. According to 40 CFR, if there is any chemical residue on the outside of a satellite container there has been a "chemical release." I have replaced the containers that were identified to be discarded by the inspector and have checked the remaining containers in the plant.

As I have mentioned to you before, please make sure that these containers are emptied at the end of each shift. I know for a fact that all of the containers are not being emptied so please make sure that you do so. Also, if there is any chemical spilled on the outside of the container please make sure that it is immediately taken care of. I will be adding the satellite containers to my weekly inspection of the chemical room so please make sure that your areas are squared away. One more item that was discussed was that we should make sure that the containers are kept closed at all times unless materials are being disposed of. The inspector will be back within (30) days for a follow-up inspection to make sure that the problem was taken care of. If you have any questions please let me know. Thanks.

  
Heath





Chicago Rawhide

Interoffice letter

June 18, 2001

**To: All Supervisors**  
**cc: J.D. Burris, Staff, Engineering, NCDENR**  
**From: Heath Talley**

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Heath





New Green Funnel  
secured latch



Liquid waste  
container  
for work bench.



CORRECT PURCHASE ORDER, ITEM NO., AND BLANKET RELEASE NO., IF SHOWN, MUST APPEAR ON ALL PACKAGES, INVOICES, SHIPPING PAPERS AND CORRESPONDENCE. PACKING SLIPS MUST ACCOMPANY ALL SHIPMENTS.

PURCHASE ORDER
BLANKET RELEASE
CHANGE NOTICE

PAGE

INVOICE TO

ATLANTA, GA  
 FACILITY, PA

19408-9798

TO

U S DRAWNERS INC  
 834 RIVERSIDE DRIVE  
 ARNHEIMVILLE

NO 28804

SHIP TO

CHICAGO RAWHIDE  
 324 INDUSTRIAL PARK ROAD

FRANKLIN, NC  
 28734

808-524-8445

DATE PRINTED	TERMS OF SALE	TAX CERTIFICATION NUMBER	TAX
06/13/91	1ST RUN/2ND MO		0.00
SHIP VIA	F.O.B.	FREIGHT TERMS	ADDITIONAL COST
* UNITED PARCEL	FOB ORIGIN, FRE	FOB ORIGIN, CRK	0.00

LINE	QUANTITY DATE DUE	UOP CAT. NO.	ITEM NUMBER VENDOR ITEM NO.	UNIT PRICE	AMOUNT
* SHIPMENTS LESS THAN 150 LBS SHIP UPS					
0001	5 06/03/91	EA 28	4T080 4T080	32.35000	161.75
RETAIL SATELLITE WASTE ACCUMULATOR CANS					
TAX(=)					1.97
0002	4 06/03/91	EA 28	4T082 4T082	24.04000	96.16
RETAIL SAFETY DISPOSAL CAN (LIQUID)					
TAX(=)					0.73
0003	1 06/03/91	EA 28	3AM06 3AM06	145.60000	145.60
SAFETY DRUM FUNNEL					
TAX(=)					1.90

04-80 (Rev. 8-11-85)

See Reverse Side And Attachments For Instructions And Additional Terms And Conditions Which Are Incorporated Herein As A Part Of This Purchase Order

TOTAL ▶

397.71



A Unit of SKF, USA, Inc.

If Any Questions Regarding This Order Contact: Phone No. 808-524-8445

FLM *Alvin R. [Signature]*  
 AUTHORIZED SIGNATURE



File  
7/21/01  
①

RECEIVED  
JUL 10 7 0001  
BY: [Signature]

RCRIS: EVALUATION Add/Update

Evaluation data:  
New: Change: Delete:

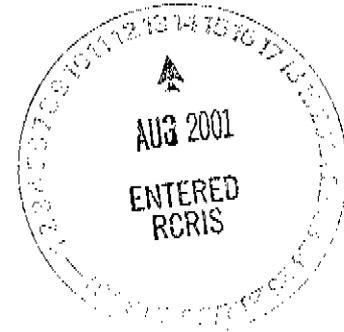
EPA ID#: NCR000001164  
Facility name: CR Industries City: Franklin  
Responsible Agency: S

Date of Evaluation: 14 Jun 2001

Resp. Branch: 01  
Resp. Person: 030/B. Burch

Type of Evaluation: CEI

Reason of Eval.: na  
Evaluation Comment: One Violation.



SUPERVISOR'S NOV TRACKING INFORMATION

Type: CEI  
Initial Inspection Date: 14 Jun 2001  
Docket number: 2001-151  
Reinsptdate:

COMMENTS: One Violation.

VIOLATION DATA: New: Change: Delete:

EPA ID#: NCR000001164

Facility name: CR Industries City: Franklin

Resp. Branch: 01  
Resp. Person: 030/B. Burch

- 1. date determined: 14 Jun 2001  
Area: GPT  
Class: 120  
Regulation: 40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 - Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Scheduled Response: 16 Jul 2001  
Date resolved:

Violation Comment: CR Industries is in violation of 40 CFR



262.34(d)(4) adopted by refernce at 40 CFR 265.31 in that they failed to maintain and operate the facility in order to prevent any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, releases of hazardous waste were observed on two 5-gallon containers being used to accumulate hazardous waste in the mix station of the storage room. In order to correct the violation, the facility must clean releases of hazardous waste off the containers, and ensure that future releases of hazardous waste are immediately addressed.

2. date determined: 14 Jun 2001

Area:  
Class:  
Regulation:

Scheduled Response:  
Date resolved:

Violation Comment:

3. date determined: 14 Jun 2001

Area:  
Class:  
Regulation:

Scheduled Response:  
Date resolved:

Violation Comment: \*comment3

4. date determined: 14 Jun 2001

Area:  
Class:  
Regulation:

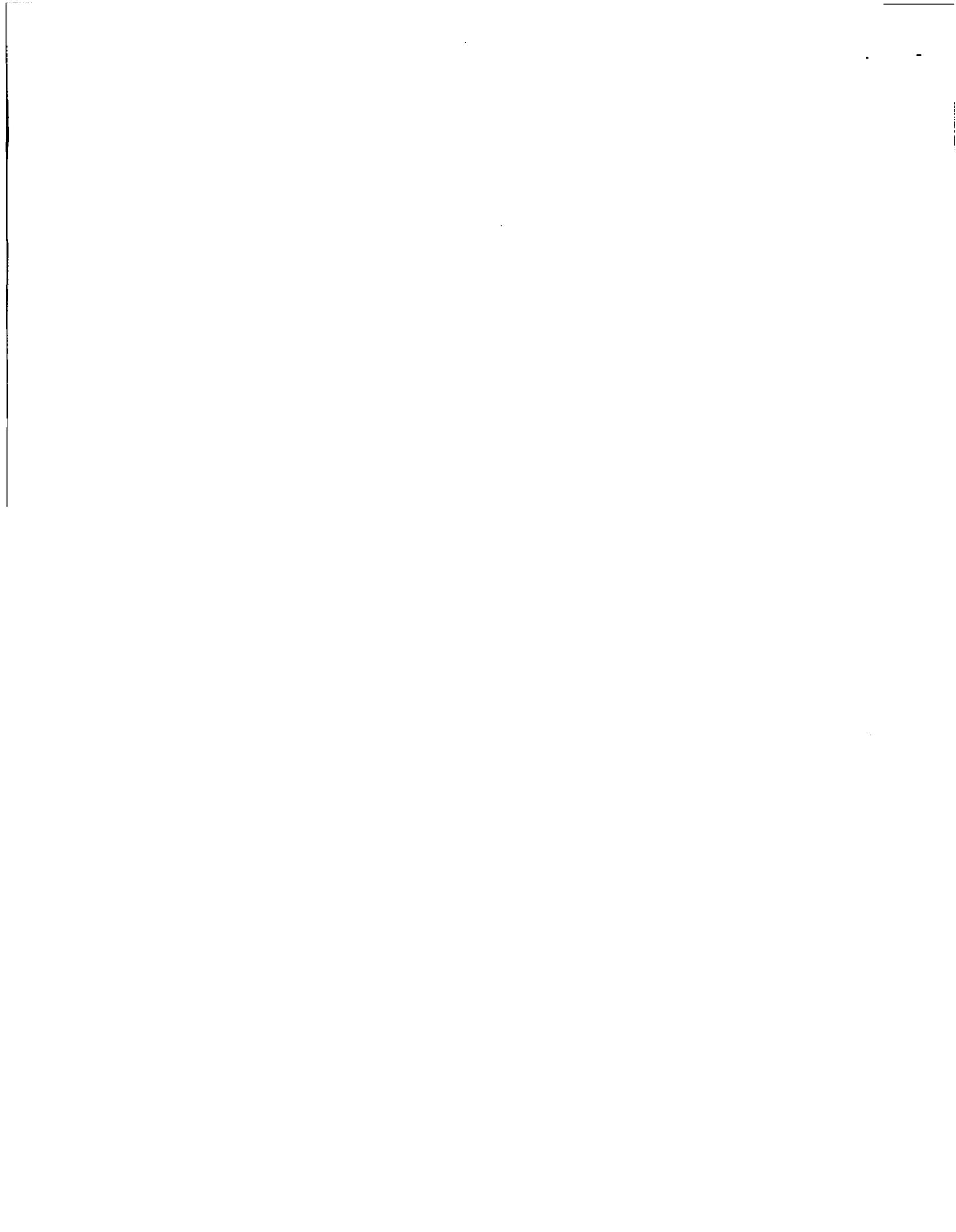
Scheduled Response:  
Date resolved:

Violation Comment:

5. date determined: 14 Jun 2001

Area:  
Class:  
Regulation:

Scheduled Response:  
Date resolved:



NOTICE OF VIOLATION  
Inspection date: 14 Jun 2001

CR Industries  
324 Industrial Park Road  
Franklin  
28734

Facility Type: SQG  
Docket#: 2001-151

NCR000001164

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 14 Jun 2001, Brent Burch, 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:

Specifics

40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 - Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. CR Industries is in violation of 40 CFR 262.34(d)(4) adopted by refernce at 40 CFR 265.31 in that they failed to maintain and operate the facility in order to prevent any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, releases of hazardous waste were observed on two 5-gallon containers being used to accumulate hazardous waste in the mix station of the storage room. In order to correct the violation, the facility must clean releases of hazardous waste off the containers, and ensure that future releases of hazardous waste are immediately addressed.

You are hereby required to correct the noted violation(s) by 16 Jul 2001.

In further satisfaction of Docket # 2001-151, CR Industries shall provide written certification with

supporting documentation on company letterhead confirming the noted compliance schedule has been completed. Mail this certification to Brent Burch at 59 Woodfin Place; Asheville, North Carolina; 28801 by the noted compliance date.

You are hereby required to comply with the noted violation(s) by 16 Jul 2001, 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.

6/19/01  
(Date)

[Signature]  
N.C. Hazardous Waste Section

I, Brent Burch, hereby certify that I have personally served a copy of this Notice on:

Mr. Heath Talley, at Chicago Roadside, 324 Industrial Park Road

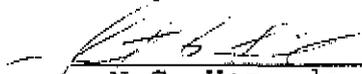
on June 19, 20001. [Signature]  
(Recipient Signature)

copies to: field files  
          central files  
          Regional Office

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6/19/01  
(Date)

  
N.C. Hazardous Waste Section

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Mr. Heath Talley, at Chicago Products, 324 Industrial Park Blvd  
on June 19, 2001.   
(Recipient Signature)  
copies to: field files  
          central files  
          Regional Office

NOTICE OF VIOLATION  
Inspection date: 14 Jun 2001

CR Industries  
324 Industrial Park Road  
Franklin  
28734

Facility Type: SQG  
Docket#: 2001-151

NCR000001164

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RCRA INSPECTION REPORT

1. FACILITY INFORMATION

CR Industries  
324 Industrial Park Road  
Franklin 28734

NCR000001164 SQG

2. FACILITY CONTACT

Mr. Heath Talley  
(828) 524-8444

3. SURVEY PARTICIPANTS

Heath Talley, and Brent Burch

4. DATE OF INSPECTION

14 Jun 2001

5. PURPOSE OF INSPECTION

To determine compliance with 40 CFR 262, 265, & 268.

6. FACILITY DESCRIPTION

CR Industries (Chicago Rawhide) is a manufacturer of rubber oil seals and gaskets for after market automobile maintenance. Processes at the facility include extruding, milling, prepping, molding and painting. The facility uses injection and compression molding to form the gaskets and seals. Hazardous wastes are generated from the cleaning of the gaskets and seals, and cleaning of spray booth guns.

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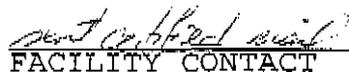
7. SITE DEFICIENCIES:

Notice of Violation - The inspection found the facility to be in violation of the following:

40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 - Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. CR Industries is in violation of 40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 in that they failed to maintain and operate the facility in order to prevent any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, releases of hazardous waste were observed on two 5-gallon containers being used to accumulate hazardous waste in the mix station of the storage room. In order to correct the violation, the facility must clean releases of hazardous waste off the containers, and ensure that future releases of hazardous waste are immediately addressed.

  
INSPECTOR

date: 6/19/01

  
FACILITY CONTACT

The facility maintains a written contingency plan. The plan complies with the large generator requirements. Sprinklers, and extinguishers are used for fire suppression. Spill cabinets consist of booms, pigs, and absorbant. The facility has made arrangements with the local emergency responders.

Satellite storage containers are maintained in the mix station in the storage room (two 5-gal), and the large diameter seal area (two 5-gal, and two 10-gal). Both containers in the mix station had releases. All containers were labeled, and closed.

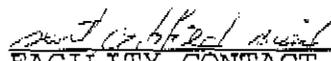
The facility maintains a <180-day storage area in the storage room. The area is surrounded by a dike. Extinguishers, and a dry chemical sprinkler system are located in the area. Radios are used for communication. At the time of the inspection, there were two 55-gallon containers in storage. Both containers were labeled, dated, and closed. No releases were observed on the containers.

7. SITE DEFICIENCIES:

Notice of Violation - The inspection found the facility to be in violation of the following:

40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 - Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. CR Industries is in violation of 40 CFR 262.34(d)(4) adopted by reference at 40 CFR 265.31 in that they failed to maintain and operate the facility in order to prevent any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, releases of hazardous waste were observed on two 5-gallon containers being used to accumulate hazardous waste in the mix station of the storage room. In order to correct the violation, the facility must clean releases of hazardous waste off the containers, and ensure that future releases of hazardous waste are immediately addressed.

  
INSPECTOR date: 6/15/06

  
FACILITY CONTACT

## RCRA INSPECTION REPORT

### 1. FACILITY INFORMATION

CR Industries  
324 Industrial Park Road  
Franklin 28734

NCR000001164 SQG

### 2. FACILITY CONTACT

Mr. Heath Talley  
(828) 524-8444

### 3. SURVEY PARTICIPANTS

Heath Talley, and Brent Burch

### 4. DATE OF INSPECTION

14 Jun 2001

### 5. PURPOSE OF INSPECTION

To determine compliance with 40 CFR 262, 265, & 268.

### 6. FACILITY DESCRIPTION

CR Industries (Chicago Rawhide) is a manufacturer of rubber oil seals and gaskets for after market automobile maintenance. Processes at the facility include extruding, milling, prepping, molding and painting. The facility uses injection and compression molding to form the gaskets and seals. Hazardous wastes are generated from the cleaning of the gaskets and seals, and cleaning of spray booth guns.

Manifests were on-site and available for review. Manifests indicate that Ashland Distribution Corporation (NCD061263315), Safety Kleen Systems (ILD984908202), and Wills Trucking (OHD068913409) were used as transporters. Designated TSDF's were listed as Ashland Distribution Corporation (NCD061263315), and Safety Kleen Systems (SCD981031040). Wastes generated by the facility are a D001/F003/F005/D035 waste flammable liquid (mek, xylene, toluene, ethyl acetate), a D035/F003/F005 hazardous waste solid, D009 waste mercury (light containing mercury), and D008/D002 waste batteries. All manifests were signed by the designated TSDF. I discussed the universal waste policy for the lcm's and batteries.

According to records at the facility, hazardous waste training is conducted on an annual basis. The facility maintains records showing job titles and job descriptions for positions related to hazardous waste management.