

Hazardous Waste Section  
File Room Document Transmittal Sheet

17

Your Name: Larry Stanley  
EPA ID: NCD085074821  
Facility Name: Clariant-West  
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July 18, 2007

Mr. Karim Pathan  
NC DENR  
Hazardous Waste Management Division  
1646 Mail Service Center  
Raleigh, NC 27699-1646

Sent via Certified Mail July 18, 2007

Subject: Clariant Corporation – Mount Holly West Plant  
EPA ID No. NCD 085 074 821  
Compliance with Session Law 2007-107 (House Bill 36)  
Hazardous Materials Task Force Recommendations

Mr. Pathan:

Camp Dresser & McKee (CDM), on behalf of the Clariant Corporation Mount Holly West Plant, is submitting this information to your agency as required by the North Carolina Department of Environment and Natural Resources (NCDENR) and specified in the above referenced House Bill 36. Subsection (d) of this Bill requires that any permitted hazardous waste facility provide the following information to all emergency response agencies identified in the facility's contingency plan (included in the facility's Part B permit):

- Information on the nature and type of operations to occur at the facility.
- Identification of the properties of the hazardous waste to be managed at the facility.
- A copy of the draft contingency plan for the facility that includes the proposed role for each local government and emergency response agency that received information under this subsection.
- Information on the hazardous waste locations within the facility.

A copy of the NCDENR letter to Clariant dated July 6, 2007 as well as the relevant sections from Clariant's Part B permit application that address the required documentation applicable to your agency as itemized above is provided as an attachment.

Subsection (e) of this Bill requires that each agency that receives this submittal provide written comment on the adequacy of the contingency plan and the availability and adequacy



Mr. Karim Pathan  
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of the agency to respond in the event of a release. The text of Subsection (e) is provided below:

***(e) Within 60 days of receiving the information, each local government and emergency response agency that receives information under subsection (d) of this section shall respond to the applicant in writing as to the adequacy of the contingency plan and the availability and adequacy of its resources and equipment to respond to an emergency at the facility that results in a release of hazardous waste or hazardous waste constituents into the environment according to the role set forth for the local government or emergency response agency under the contingency plan.***

As required by Subsection (e), your response to this letter is required within 60 days of receipt of this information. Please forward your response to the following Clariant Corporation representative no later than September 18, 2007 to allow for our subsequent correspondence to NCDENR.

Clariant Corporation  
PO Box 866  
Mount Holly, NC 28120  
Attn. Mr. Gil Insley

We greatly appreciate your attention to this matter. If you have any questions, please do not hesitate to call Mr. Gil Insley at (704) 822-2218 or myself at (919) 787-5620.

Very truly yours,

A handwritten signature in black ink that reads 'Tim Grant'.

Timothy D. Grant, P.G.  
Principal  
Camp Dresser & McKee

cc: Gil Insley, Clariant  
Ron Walton, Clariant  
Andre Pollard, Clariant

**NC DENR COMPLIANCE LETTER**  
**JULY 6, 2007**



Received 7/10/07

North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor

William G. Ross Jr., Secretary

July 6, 2007

**CERTIFIED MAIL**

Mr. Gil Insley, PE  
Environmental Leader  
Clariant Corporation, West Plant  
PO Box 866  
Mount Holly, NC 28120

**Re: Compliance with Session Law 2007-107 (House Bill 36)  
Hazardous Materials Task Force Recommendations**

Dear Mr. Insley:

Certain provisions of Session Law 2007-107 House Bill 36 (Hazardous Materials Task Force Recommendations) became effective upon signing by the governor on June 26, 2007. Section 1.2.(a) amends G.S. 130A-295 by adding additional notification and verification requirements. Section 1.2.(b) sets the effective date for the changes to the Statute. These Sections are copied below:

**SECTION 1.2.(a)** G.S. 130A-295 is amended by adding four new subsections to read:

"(d) At least 120 days prior to submitting an application, an applicant for a permit for a hazardous waste facility shall provide to the county in which the facility is located, to any municipality with planning jurisdiction over the site of the facility, and to all emergency response agencies that have a role under the contingency plan for the facility all of the following information:

- (1) Information on the nature and type of operations to occur at the facility.
- (2) Identification of the properties of the hazardous waste to be managed at the facility.
- (3) A copy of the draft contingency plan for the facility that includes the proposed role for each local government and each emergency response agency that received information under this subsection.
- (4) Information on the hazardous waste locations within the facility.

(e) Within 60 days of receiving the information, each local government and emergency response agency that receives information under subsection (d) of this section shall respond to the applicant in writing as to the adequacy of the contingency plan and the availability and adequacy of its resources and equipment to respond to an emergency at the facility that results in a release of hazardous waste or hazardous waste constituents into the environment according to the role set forth for the local government or emergency response agency under the contingency plan.

(f) An applicant for a permit for a hazardous waste facility shall include documentation that each local government and emergency response agency received the

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Mr. Insley  
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information required under subsection (d) of this section, the written responses the applicant received under subsection (e) of this section, and verification by each that its resources and equipment are available and adequate to respond to an emergency at the facility in accordance with its role as set forth in the contingency plan. If the applicant does not receive a timely verification from a local government or emergency response agency notified under subsection (d) of this section, the Department shall verify the adequacy of resources and equipment for emergency response during the course of review of the permit application, taking into account any contracts entered into by the applicant for such emergency response resources.

(g) At each two-year interval after a permit for a hazardous waste facility is issued, the permit holder shall verify that the resources and equipment of each local government and emergency response agency are available and adequate to respond to an emergency at the facility in accordance with its role as set forth in the contingency plan and shall submit this verification to the Department."

**SECTION 1.2.(b)** This section is effective when it becomes law and applies to applications pending on the date this section becomes effective. An applicant shall provide the information required under G.S. 130A-295(d), as enacted by this section, as it relates to an application pending on the date this section becomes effective within 30 days after this section becomes effective.

***Your facility has been identified as having either, a pending permit application, an open permit call letter, or a permit call letter that will be issued within 120 days. You are, therefore, required to submit the information and verifications listed in Section 1.2.(a) to the Division of Waste Management, no later than July 26, 2007.***

Verifications of initial receipt of this information by the county, municipality and emergency response agencies must include the signature of the accepting person or agent and the date received. The verifications should be mailed to:

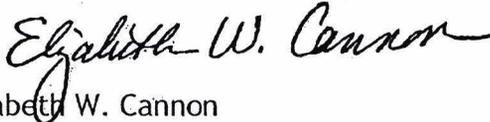
Elizabeth W. Cannon  
Hazardous Waste Section Chief  
North Carolina Division of Waste Management  
401 Oberlin Road, Suite 150  
(Mail Service Center 1646)  
Raleigh, North Carolina 27699-1646

Note also that under Subsection (f), your permit application package must include written responses you have received from each local government and emergency response agency as well as verification that resources and equipment are available and adequate to respond to an emergency at your facility.

Mr. Insley  
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July 6, 2007

If you have questions regarding the implementation of these requirements, or if you believe you have received this letter in error, please contact Bud McCarty at (919) 508-8552 or Vance Jackson at (919) 508-8545.

Sincerely,



Elizabeth W. Cannon  
Hazardous Waste Section Chief  
North Carolina Division of Waste Management

cc: Karim Pathan  
Vance Jackson  
File Room

**RCRA SUBTITLE C SITE  
IDENTIFICATION FORM**

<p><b>SEND COMPLETED</b> <b>FORM TO:</b> The Appropriate State or EPA Regional Office.</p>	<p>United States Environmental Protection Agency</p> <p><b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b></p>		
<p><b>1. Reason for Submittal</b> (See instructions on page 14.)</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p><b>Reason for Submittal:</b></p> <p><input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)</p> <p><input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report</p>		
<p><b>2. Site EPA ID Number</b> (page 15)</p>	<p>EPA ID Number</p> <p style="text-align: center;">N   C   D   1   0   8   5   1   0   7   4   1   8   2   1  </p>		
<p><b>3. Site Name</b> (page 15)</p>	<p>Name: <b>Clariant Corporation - Mount Holly West</b></p>		
<p><b>4. Site Location Information</b> (page 15)</p>	<p>Street Address: <b>625 East Catawba Avenue</b></p>		
	<p>City, Town, or Village: <b>Mount Holly</b></p>	<p>State: <b>NC</b></p>	
	<p>County Name: <b>Gaston</b></p>	<p>Zip Code: <b>28120</b></p>	
<p><b>5. Site Land Type</b> (page 15)</p>	<p>Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p><b>6. North American Industry Classification System (NAICS) Code(s) for the Site</b> (page 15)</p>	<p>A. <b>13251991</b></p>	<p>B. _____</p>	
	<p>C. _____</p>	<p>D. _____</p>	
<p><b>7. Site Mailing Address</b> (page 16)</p>	<p>Street or P. O. Box: <b>PO Box 866</b></p>		
	<p>City, Town, or Village: <b>Mount Holly</b></p>		
	<p>State: <b>NC</b></p>		
	<p>Country: <b>United States</b></p>	<p>Zip Code: <b>28120</b></p>	
<p><b>8. Site Contact Person</b> (page 16)</p>	<p>First Name: <b>Gilbert</b></p>	<p>MI: <b>A</b></p>	<p>Last Name: <b>Insley</b></p>
	<p>Phone Number: <b>704-822-2218</b> Extension:</p>		<p>Email address: <b>gil.insley@clariant.com</b></p>
<p><b>9. Operator and Legal Owner of the Site</b> (pages 16 and 17)</p>	<p>A. Name of Site's Operator: <b>Clariant Corporation</b></p>		<p>Date Became Operator (mm/dd/yyyy): <b>07/01/1997</b></p>
	<p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
	<p>B. Name of Site's Legal Owner: <b>Clariant Corporation</b></p>		<p>Date Became Owner (mm/dd/yyyy): <b>07/01/1997</b></p>
	<p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

9. Legal Owner (Continued) Address	Street or P. O. Box: <u>4000 Monroe Road</u>	
	City, Town, or Village: <u>Charlotte</u>	
	State: <u>NC</u>	
	Country: <u>United States</u>	Zip Code: <u>28205</u>

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 18 to 21.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

1. Generator of Hazardous Waste  
If "Yes", choose only one of the following - a, b, or c.
- a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste
- In addition, indicate other generator activities.
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

2. Transporter of Hazardous Waste
3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
4. Recycler of Hazardous Waste (at your site)
5. Exempt Boiler and/or Industrial Furnace  
If "Yes", mark each that applies.
- a. Small Quantity On-site Burner Exemption
- b. Smelting, Melting, and Refining Furnace Exemption
6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

2. Destination Facility for Universal Waste  
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

1. Used Oil Transporter  
If "Yes", mark each that applies.
- a. Transporter
- b. Transfer Facility
2. Used Oil Processor and/or Re-refiner  
If "Yes", mark each that applies.
- a. Processor
- b. Re-refiner
3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer  
If "Yes", mark each that applies.
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 22.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D007	D008	D009	D011
D022	F002	F003	F005	U007	U122	U151

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.


12. Comments (See instructions on page 22.)

Multiple empty lines for providing comments.

13. 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. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 22.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
<i>K. L. Golder</i>	Kenneth L. GOLDER PRES & C.E.O	06/13/2005

United States Environmental Protection Agency  
**HAZARDOUS WASTE PERMIT INFORMATION FORM**

Facility Permit Contact (See instructions on page 23)	First Name: <u>Gilbert</u>	MI: <u>A</u>	Last Name: <u>Insley</u>
	Phone Number: <u>704-822-2218</u>		Phone Number Extension:
Facility Permit Contact Mailing Address (See instructions on page 23)	Street or P.O. Box: <u>Po Box 866</u>		
	City, Town, or Village: <u>Mount Holly</u>		
	State: <u>NC</u>		
	Country: <u>United States</u>		Zip Code: <u>28120</u>
Operator Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: <u>4000 Monroe Road</u>		
	City, Town, or Village: <u>Charlotte</u>		
	State: <u>NC</u>		
	Country: <u>United States</u>	Zip Code: <u>28205</u>	Phone Number: <u>704-331-7000</u>
Legal Owner Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: <u>4000 Monroe Road</u>		
	City, Town, or Village: <u>Charlotte</u>		
	State: <u>NC</u>		
	Country: <u>United States</u>	Zip Code: <u>28205</u>	Phone Number: <u>704-331-7000</u>
Facility Existence Date (See instructions on page 24)	Facility Existence Date (mm/dd/yyyy): <u>1953</u>		

**Other Environmental Permits (See instructions on page 24)**

A. Permit Type (Enter code)	B. Permit Number	C. Description
R	NC D 0 8 5 0 7 4 8 2 1	RCRA
N	NC S 0 0 0 0 4 1	NPDES - stormwater
N	NC G 5 0 0 0 4 7	NPDES - non-contact cooling/boiler
E	1 1 5 8	IUP - wastewater discharge
E	0 8 5 4 2 R 1 8	Air permit

**Nature of Business (Provide a brief description; see instructions on page 24)**

The Clariant Mount Holly West Plant is part of the Clariant Corporation and produces a variety of specialty chemicals. The principal products generated at this facility are surfactants and insect repellent (DEET).

Process Codes and Design Capacities (See instructions on page 24) - Enter information in the Sections on Form Page 3.

A. PROCESS CODE - Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), enter the process information in Item 9 (including a description).

B. PROCESS DESIGN CAPACITY- For each code entered in Section A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
2. UNIT OF MEASURE - For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	<u>Disposal:</u>			<u>Treatment (continued):</u>	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	For T81-T93:
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure in Code Table Below	T86	Blast Furnace	
	<u>Storage:</u>		T87	Smelting, Melting, or Refining Furnace	Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
S99	Other Storage	Any Unit of Measure in Code Table Below	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	<u>Treatment:</u>			<u>Miscellaneous (Subpart X):</u>	
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour.....	D	Cubic Yards.....	Y
Gallons Per Hour.....	E	Metric Tons Per Hour.....	W	Cubic Meters.....	C
Gallons Per Day.....	U	Short Tons Per Day.....	N	Acres.....	B
Liters.....	L	Metric Tons Per Day.....	S	Acre-feet.....	A
Liters Per Hour.....	H	Pounds Per Hour.....	J	Hectares.....	Q
Liters Per Day.....	V	Kilograms Per Hour.....	R	Hectare-meter.....	F
		Million Btu Per Hour.....	X	Btu Per Hour.....	I

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only			
	(1) Amount (Specify)	(2) Unit of Measure (Enter code)								
X 1	S	0	2	5 3 3 . 7 8 8	G	0 0 1				
1	S	0	1	6 0 5 0 . 0 0 0	G	0 0 1				
2										
3										
4										
5										
6										
7										
8										
9										
1 0										
1 1										
1 2										
1 3										
1 4										
1 5										

NOTE: If you need to list more than 15 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in sequence with Item 8)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
	(1) Amount (Specify)	(2) Unit of Measure (Enter code)					
X 2	T	0	4	1 0 0 . 0 0 0	U	0 0 1	In-situ Vitrification

10. Description of Hazardous Wastes (See instructions on page 25) - Enter information in the Sections on Form Page 5.

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in Section B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 10.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Section A. On the same line complete Sections B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES																	
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))													
X	1	K	0	5	4	900	P	T	0	3	D	8	0											
X	2	D	0	0	2	400	P	T	0	3	D	8	0											
X	3	D	0	0	1	100	P	T	0	3	D	8	0											
	4	D	0	0	2																			Included With Above

10. Description of Hazardous Wastes (Continued. Use the Additional Sheet(s) as necessary; number pages as 5 a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES																
				(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))						
1	D 0 0 1	370,000	P	S	0	1														
2	D 0 0 1	15,000	P	S	0	1														
3	D 0 6 2																			included with above
4	D 0 0 1	500	P	S	0	1														
5	D 0 0 2																			included with above
6	D 0 0 3																			included with above
7	F 0 0 2	3,000	P	S	0	1														
8	F 0 0 5																			included with above
9	D 0 0 1																			included with above
10	D 0 2 2																			included with above
11	D 0 0 2	13,000	P	S	0	1														
12	D 0 0 2	240	P	S	0	1														
13	D 0 0 7																			included with above
14	D 0 0 9																			included with above
15	D 0 1 1																			included with above
16	D 0 0 9	10	P	S	0	1														
17	U 1 5 1	5	P	S	0	1														
18	D 0 0 9																			included with above
19	U 0 0 7	2,000	P	S	0	1														
20	U 1 2 2	6,000	P	S	0	1														
21	D 0 0 8	450	P	S	0	1														
22	F 0 0 3	450	P	S	0	1														
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**SECTION C**  
**WASTE ANALYSIS PLAN**  
**(PART B PERMIT)**

## Section C

# Waste Analysis Plan

This section describes the chemical and physical nature of the hazardous wastes generated and stored at Clariant Mount Holly West Plant in accordance with 40 CFR 264.13 and 40 CFR 270.14(b)(2) and (3). North Carolina has adopted these regulations as 15A NCAC 13A.0109(c) and 15A NCAC 13A.0113(b). Hazardous wastes are stored at the Clariant Plant in containers. There are no hazardous waste storage tanks, waste piles, waste combustion units, landfills, or land treatment units.

A general description of each waste category, including its hazardous characteristics and the basis for the hazardous designation, is provided in this Waste Analysis Plan (WAP). Also included are the procedures for sampling and testing each waste category, used to ensure that sufficient information is available for the safe storage and handling of the waste.

### C-1 Waste Management and Identification

The Clariant Plant produces over 300 chemicals for a variety of major industrial end users. Most of these chemicals fall into two main categories of finished products: surfactants and insect repellent. The insect repellent manufactured at the plant is N, N-diethyl-m-toluamide (DEET). Surfactants are generated for the metal, oilfield, personal care, detergent, aircraft, crop protection, and textile industries. Industrial biocides are also produced for the personal care industry.

Hazardous waste is generated at the Clariant Plant as a result of the chemical production. Hazardous wastes are also generated by the research and development laboratory, the operations laboratory, and maintenance activities at the Plant. Most of the hazardous wastes generated at the Clariant Plant are characterized as hazardous due to ignitability, corrosivity, toxicity, and/or reactivity. Some U-listed waste is generated from the disposal of out-of-date raw materials and toxic chemicals from equipment cleanout. Generic hazardous waste is generated from halogenated and non-halogenated laboratory solvents. All wastes are stored in containers until transferred from the facility for off-site treatment or disposal. No wastes are received from off-site.

#### C-1.a Waste Management Processes and Activities

There is only one Hazardous Waste Container Storage Area currently in use at Clariant Mount Holly West, located approximately 50 feet south of Plant 1 and designated as the Plant 1 Hazardous Waste Container Storage Area. The primary container sizes stored at the Clariant Mount Holly West Facility are 275-gallon totes and 55-gallon drums. A few 30-gallon drums are also stored at the site. The container storage area, which is approximately 35 feet by 16 feet, is subdivided by a masonry curb for storage on one side of 64 drums, or sixteen 275-gallon totes, of ignitable (and ignitable-compatible) waste; and 24 drums, or six 275-gallon totes, of corrosive and

corrosive-compatible waste on the other. All production-related waste streams are staged in areas designated as a "Red Zone" before being transferred to the appropriate storage area. The objective of a Red Zone is to ensure wastes are properly profiled, marked, labeled, dated, stored in a compatible container, and inventoried in accordance with local, state, and federal regulations. There are four Red Zones (including the future Plant #5 Red Zone) at the Clariant Plant. Further details regarding waste management activities and procedures can be found in Section D.

### **C-1.b Waste Identification/Classification**

The Clariant Plant is a specialty chemical batch-process plant and as such handles more than 300 raw materials and finished products per year. The maximum life span of a distinctive product is typically less than 5 years. The average life span is less than 2 years. While current waste streams have been characterized, it is difficult or impossible to predict all future hazardous waste streams at this site. Therefore, all waste streams generated or anticipated at the Clariant Plant have been categorized. Table C-1 presents the waste categories for permitted hazardous waste container storage at the Clariant Plant.

Hazardous wastes managed at the Clariant Plant are identified by analyses, such as pH or flash point, or through generator knowledge. Typical lab reports for waste categories identified by analyses are provided in Appendix C-1. Profiles of waste streams and Waste Inventory Sheets that typify each waste category are also provided in Appendix C-1. Waste Inventory Sheets are forms submitted by the waste generator to Clariant's Water & Waste Department to provide pertinent information and record generator knowledge about the waste. This information includes the process in which the waste was generated, the quantity of waste, the number and type of containers used, chemical constituents of the waste, and the physical properties of the waste.

Table C-1 also provides the rationale through which each waste is classified as hazardous. Ignitable wastes (D001) are generated during production or are finished products or raw materials that have exceeded their shelf life, no longer have a viable market, or are off-specification. An example of this waste is Texcare 3702-75 Distillate, which is a methanol solution. Corrosive wastes (D002) and ignitable/corrosive wastes (D001, D002) are generated during production or are finished products or raw materials that have exceeded their shelf-life, no longer have a viable market, or are off-specification. These waste categories are illustrated by Afilan PP press cake, which contains sodium hydroxide, and DNOBS process waste, which contains Isopar G and hydrochloric acid. Waste code D009, mercury, is generated as a result of broken equipment, obsolete lamps, and light bulbs.

Reactive (D003) waste streams that are sometimes corrosive and/or ignitable (D001), are sometimes generated as raw materials that have exceeded their shelf lives. Waste codes D002, D007, D009, and D011 are generated from spent chemical oxygen demand (COD) vials. Waste code U122, formaldehyde, is generated during production and laboratory operations.

Table C-1

Waste Categories – Rationale and Analysis

Waste Code	Waste Category <sup>1</sup>	Rationale	Analysis Parameters <sup>2</sup>
D001	Ignitable process waste	Ignitable, potentially corrosive	Flash point, pH
D001	Ignitable out-of-date product inventory	Ignitable, potentially corrosive	Flash point, pH
D001	Ignitable chemicals and fuels from maintenance equipment	Ignitable	Flash point, MSDS
D001, D002	Ignitable, corrosive process waste	Ignitable, corrosive	Flash point, pH, MSDS
D001, D002	Ignitable, corrosive out-of-date product inventory	Ignitable, corrosive	Flash point, pH, MSDS, generator knowledge
D002	Corrosive process waste	Corrosive	Generator knowledge, pH
D002	Corrosive out-of-date water treatment chemical	Corrosive	pH, MSDS
D002	Corrosive out-of-date product inventory	Corrosive	pH, MSDS
D001, D002, D003	Ignitable, corrosive, and/or reactive out-of-date product inventory or process waste	Ignitable, corrosive, reactive	Generator knowledge, pH, flash point, MSDS
U007	Toxic out-of-date raw material inventory	U-listed, Acrylamide	Generator knowledge, MSDS
U122	Toxic process waste	U-listed, Formaldehyde	Generator knowledge, MSDS
D001, D022, F002, F005	Ignitable, toxic spent solvent from laboratory	Ignitable, F-listed	Generator knowledge, flash point
D002, D007, D009, D011	Toxic and corrosive waste from laboratory	Toxic, corrosive	Generator knowledge, MSDS
D009	Toxic waste from maintenance or laboratory	Toxic	Generator knowledge
D009, U151	Used switches containing mercury	U-listed, Mercury	Generator knowledge

1 - All waste categories have a LDR classification of non-wastewater.

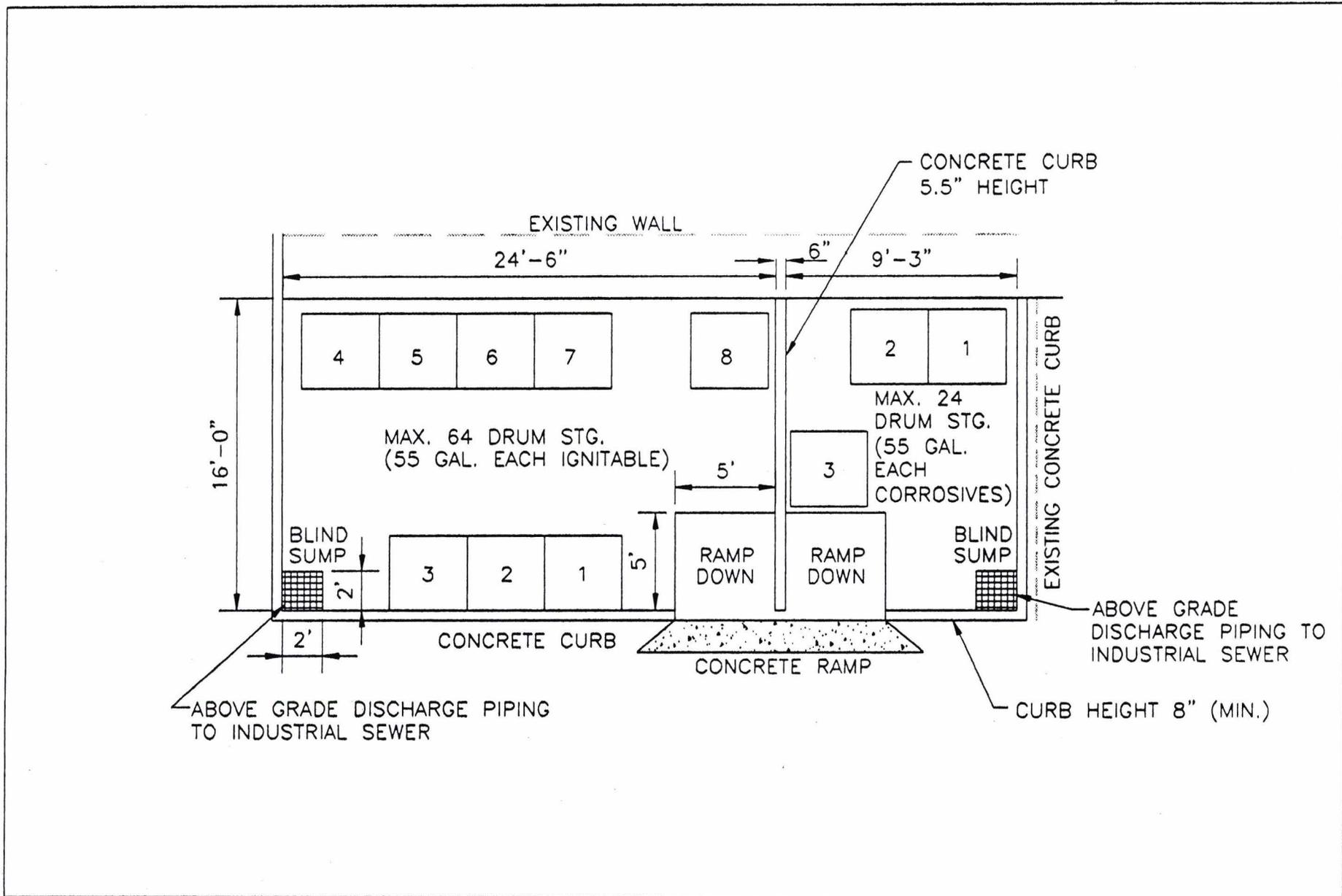
2 - At a minimum, all analysis are performed once per waste stream. If a waste stream is similar to an existing waste stream, or if a waste is generated from the same processes as an existing waste, all analysis are performed periodically.

### C-1.c Description of Hazardous Waste Management Units (HWMU)

One HWMU is used for the storage of containers at the Clariant Plant and is located as shown in Sheet 1. The HWMU is designated as the Plant 1 Hazardous Waste Container Storage Area. The layout of the Plant 1 Hazardous Waste Container Storage Area is presented in Figure C-1. The storage area is approximately 35 feet by 16 feet, and is subdivided by a masonry curb for storage of 64 drums of ignitable (and ignitable-compatible) waste on one side, and 24 drums of corrosive and corrosive-compatible waste on the other. Hazardous waste is placed in one of four "Red Zones" prior to placement in the Plant 1 Hazardous Waste Container Storage Area. The Red Zones are shown in Sheet 1. The objective of a Red Zone is to confirm waste containers are properly profiled, marked, labeled, dated, stored in a compatible container, and inventoried. Red zones are inspected on a daily basis. Prior to placement in a Red Zone, drums are marked with the name of the process in which the waste was generated and the generation date. The drums are also marked with one of the following labels: hazardous waste pending analysis, non-hazardous waste pending analysis, hazardous waste, or non-hazardous waste. If a waste is known to be hazardous prior to being placed in a Red Zone, all appropriate hazardous waste labels are attached to its container at the point of generation (*i.e.*, before the container is transferred to the Red Zone). These wastes are not staged in the Red Zone longer than 72 hours.

The actual time a drum spends in a Red Zone depends on the amount of time required for laboratory confirmation. Laboratory analysis conducted at the Clariant laboratory is generally completed within 72 hours. All permitted hazardous waste is transferred to the permitted Plant 1 Hazardous Waste Container Storage Area. All non-permitted hazardous waste (from unanticipated, non-routine events) and non-hazardous waste is transferred to an appropriate accumulation area. Non-permitted waste accumulation areas meet all regulatory 90-day compliance obligations under 40 CFR 262.34. All containers are closed, marked, labeled, and dated in accordance with 40 CFR 262 Subpart C before they are moved to the Plant 1 Hazardous Waste Container Storage Area.

The waste streams that are generated in the laboratory (*i.e.*, spent solvents (D001, D022, F002, F005), broken equipment (D009), formaldehyde (U122), and COD vials (D002, D007, D009, D011)) are accumulated at satellite accumulation points and are subsequently transferred to appropriate containers in the Plant 1 Hazardous Waste Container Storage Area. The hazardous waste containers will be closed, marked, labeled, and dated.



Clariant manages ignitable, reactive, and corrosive wastes in containers. Table C-1 shows which wastes have these characteristics. Ignitable wastes, which are identified by flash point analysis, are segregated from other wastes in the Hazardous Waste Container Storage Area. Containers of reactive wastes are segregated by placing them within spill trays to act as secondary containment. Drums of waste that are incompatible with other stored waste, when present are also placed within spill trays. Precautions for managing ignitable and reactive wastes are discussed in Section F-5.

### **C-1.c(1) Containers**

The containers used at the Clariant Plant are compatible with the waste stored in them. Ignitable waste is stored in steel or polyethylene drums. All other wastes, including corrosive, reactive, toxic, and listed wastes, are stored in polyethylene or epoxy-lined phenolic steel drums.

As previously discussed, Clariant does manage ignitable and reactive wastes. Wastes that are ignitable and/or reactive are identified in Table C-1. The "Rationale" column indicates whether a waste is ignitable and/or reactive.

The hazardous wastes at Clariant are generally free liquids, and the storage area at the Clariant Plant is designed to store free liquids. Test procedures to show that wastes do not contain free liquids are not necessary.

### **C-1.d Waste Re-Evaluation Frequencies**

Waste streams at the Clariant Plant are analyzed once when they are generated and once per calendar year thereafter. Waste streams are also analyzed whenever there is a change in the process generating the waste. The generator profile sheet is reviewed and updated each time the waste stream is analyzed, and each time that Clariant is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed.

## **C-2 Parameter Selection and Rationale**

### **C-2.a Waste Identification**

The waste streams at the Clariant Plant are identified as hazardous in accordance with 40 CFR 261 and characterized based on a variety of parameters. Table C-1 shows which parameters are used for characterization of each waste stream. Flash point, pH, Material Safety Data Sheets (MSDS), and generator knowledge of material as recorded on Waste Inventory Sheets are the parameters used to support characterization of the waste streams.

The rationale for the analysis or analyses used for each waste stream is also shown in Table C-1. Wastes with the potential to be ignitable or corrosive, based on the process or generator knowledge, are analyzed for flash point and pH, respectively. These parameters classify the wastes as ignitable and/or corrosive and provide knowledge as to what containers will be compatible for storage as well as what conditions are

required for safe storage of the materials. Generator knowledge is used as the parameter for classification when the generation process of the waste streams is well-known and adequate to classify the streams appropriately. Facilities receiving hazardous waste from the Clariant Plant are notified of the land disposal restriction (LDR) status of each waste so that the wastes can be treated and/or disposed of properly.

### **C-2.b Identification of Incompatible and Inappropriate Wastes**

As described in the previous section, flash point and pH are used to identify ignitable and corrosive wastes, respectively. This information ensures that ignitable and corrosive wastes will be handled and stored appropriately. Adequate generator knowledge of the processes generating hazardous wastes is also used to identify incompatible wastes.

### **C-2.c Process and Design Considerations**

Analysis of pH and flash point and knowledge of the generation process are used to determine the appropriate storage area for each waste generated at the Clariant Plant. Waste that is not permitted for storage in the Plant 1 Hazardous Waste Container Storage Area is transferred to an appropriate storage accumulation area to be taken off-site for treatment or disposal. Non-permitted waste accumulation areas meet all regulatory 90-day compliance obligations under 40 CFR 262.34.

### **C-2.d TSDF Process Vents and Equipment**

Hazardous wastes stored at the Clariant Plant are not subject to Subparts AA or BB; therefore, this section is not applicable.

### **C-2.e Exemption from Subpart CC**

Clariant is not seeking exemption to Subpart CC.

### **C-2.f Unit Specific Parameters**

The pH and flash point are unit specific parameters used to identify ignitable and corrosive wastes. Table C-1 indicates which wastes are identified by these parameters.

## **C-3 Sampling Procedures**

### **C-3.a Sampling Methods and Equipment**

Waste is sampled by the production unit that generates the waste. The sample may be collected at the point of generation or in a Red Zone. All pumpable wastes in containers are sampled using a coliwasa or a 3.5-foot glass sampling rod. The coliwasa or glass sampling rod is introduced into the liquid at a rate whereby liquid inside the tube stays level with the liquid outside the tube; this provides a composite sample of multiple strata, if present, in the container. Unpumpable waste typically consists of solid materials, including paints, press cake, and cleanup grit.

**SECTION D**  
**PROCESS INFORMATION**  
**(PART B PERMIT)**

## Section D

# Process Information

This section describes hazardous waste management processes at the Clariant Mount Holly West Plant as required by 40 CFR 270.15 and 264.175. North Carolina has adopted the federal permitting regulations by reference as 15A NCAC 13A.0113(b). Applicable permitted facility standards for hazardous waste storage are found in 40 CFR 264 Subpart I, which North Carolina adopted by reference as 15A NCAC 13A.0109(j).

### D-1 Container Storage Area

The Clariant Mount Holly West Facility stores hazardous wastes in containers. There are no hazardous waste tanks, surface impoundments, waste piles, land treatment units, landfills, or waste combustion units at the Clariant Mount Holly West Plant. There is only one Hazardous Waste Container Storage Area currently in use at Clariant Mount Holly West, located approximately 50 feet south of Plant 1 and designated as the Plant 1 Hazardous Waste Container Storage Area. The majority of wastes stored in this area are hazardous due to the characteristics of ignitability (D001) and/or corrosivity (D002). Limited quantities of other hazardous wastes are also stored in this container storage area. All waste categories stored in containers are listed in Table C-1. The primary container sizes stored at the Clariant Mount Holly West Facility are 275-gallon totes and 55-gallon drums. A few 30-gallon drums are also stored at the site. The Plant 1 Hazardous Waste Container Storage Area has the maximum capacity for twenty-two 275-gallon totes or eighty-eight 55-gallon drums. Drawings STW-22 and AH-1000 present the design drawings for the Plant 1 Hazardous Waste Storage Area.

#### D-1.a Description of System for Containers with Free Liquids and/or F020, F021, F022, F023, F026, and F027 Wastes

##### D-1.a(1) Basic Design Parameters, Dimensions, and Materials of Construction

The Plant 1 Hazardous Waste Container Storage Area is designed to store containers having free liquids. Drawings of the storage area are provided in Drawings STW-22 and AH-1000, and Appendix D-1 contains a 1994 certification of the container storage area by an independent registered professional engineer. The container storage area is inspected on a weekly basis by Clariant personnel, and all necessary repairs and improvements are made in a timely manner. The container storage area, which is approximately 35 feet by 16 feet, is subdivided by a masonry curb for storage on one side of 64 drums, or sixteen 275-gallon totes, of ignitable (and ignitable-compatible) waste; and 24 drums, or six 275-gallon totes, of corrosive and corrosive-compatible waste on the other. Containers are stored on pallets to prevent contact with standing liquids and may be stacked two pallets high, if necessary (*i.e.*, pallet-container-pallet-container).

Each portion of the storage area has a concrete floor that is free of gaps and cracks and is constructed of dense sound concrete that is sufficiently impervious to leaks, spills, and incidental rain that might blow in through the open walls until the collected material is removed. The floor of the containment area is covered with an epoxy coating. The Material Safety Data Sheet (MSDS) and specifications for this product are contained in Appendix D-2. This coating is not reactive or incompatible with the wastes stored within the containment area. The entire storage area is covered by a lean-to-roof and diked, preventing rainfall run-on.

#### **D-1.a(2) Drainage**

The containment area is diked and under a roof to prevent run-on. Each side of the containment area is sloped to a sump to collect any rain that may enter the containment area through the open walls. The containment area is designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation. A description of the liquid removal system is provided in Section D-1a(5).

#### **D-1.a(3) Capacity**

A concrete curb or wall surrounds the storage area, providing secondary containment. A sloped ramp over the top of the curb provides access into each section of the containment area. Calculations demonstrating a containment volume of more than 10 percent of the total storage volume are provided in Appendix D-3. The ignitable compatible section has a secondary containment volume of 1602 gallons, which is greater than the 10 percent storage volume of 440 gallons. Similarly, the corrosive compatible section has a secondary containment volume of 530 gallons, which is greater than the 10 percent storage volume of 165 gallons.

The entire storage area is covered by a lean-to-roof and diked, preventing rainfall run-on. Appendix D-3 presents calculations for the 10% container storage volume, plus a supplemental calculation assuming that a percentage of rainfall enters the containment storage area. The geographic storm intensity frequency data was obtained from the State of North Carolina Erosion and Sediment Control Manual, dated September 1, 1988. The 25-year, 24-hour storm in Charlotte, NC is 5.71 inches. The containment area is shown to have sufficient capacity.

#### **D-1.a(4) Provisions for Preventing or Managing Run-on**

The containment area is diked and under a roof to prevent run-on. Each side of the containment area is sloped to a sump to collect any rain that may enter the containment area through the open walls.

#### **D-1.a(5) Accumulated Liquids**

Spilled or leaked waste and accumulated run-on will be removed from the sump and collection area in a timely manner to prevent contact with waste storage containers and overflow of the collection system. The floor in each area is sloped to its own sump. A canopy over the container storage area prevents rainwater accumulation; however, leaks, spills, and incidental rainfall may occasionally collect in the sump.

Liquids observed in the sump will be removed in a timely manner to prevent overflow of the collection system, and the liquids will be visually inspected for signs of contamination, such as discoloration or surface sheen. Hazardous waste containers will also be inspected for evidence of release. If there is evidence of contamination of liquids in the sump, the liquids are sampled for pH and flash point. If the pH is between 2 and 12.5, the flash point is equal to or greater than 140°F, and the liquid is not a listed hazardous waste, it is discharged to the industrial sewer for treatment at the onsite WWTP. Leaks, spills, and incidental rainfall that does not conform to the above specified standards will be removed from the sump, placed in an appropriate container, and sent off-site for disposal at a permitted treatment, storage, and disposal facility by trained personnel. The sump is connected to the industrial sewer system, which leads to the on-site wastewater treatment plant, via above-grade carbon steel piping. A permanently installed Wilden M-4 air pump, with a capacity of approximately 60 gallons per minute, or vacuum tanker, with the capability of maintaining a minimum of 20 inches of water vacuum, will be employed to remove non-conforming liquids from the blind sumps.

### **D-1.b Containers Without Free Liquids or F020, F021, F022, F023, F026, and F027 Wastes**

As discussed in Section D-1a, the storage area at the Clariant plant is designed to store containers with free liquids; therefore, this section does not apply.

### **D-1.c Container Management Practices**

All production-related waste streams are managed in 275-gallon, 55-gallon, or 30-gallon containers and staged in an area designated as a "Red Zone", as described in Section C-1. The objective of a Red Zone is to ensure wastes are properly profiled, marked, labeled, dated, stored in a compatible container, and inventoried in accordance with local, state, and federal regulations. There are four Red Zones at the Clariant Plant. Each Red Zone is inspected on a daily basis, located in a paved area, and distinctively marked. Sheet 1 shows the location of the Plant 1 Hazardous Waste Container Storage Area and the four Red Zones. Figure D-1 shows an example hazardous waste container storage label.

Clariant uses a number of different drums and totes selected to be compatible with their contents for the storage and shipment of hazardous wastes. The containers used, their capacity, and wastes stored are given in Table D-1. The largest containers are 275-gallon totes.

**Table D-1. Hazardous Waste Containers**

<b>Waste Stored</b>	<b>Capacity</b>	<b>Container Description</b>
Corrosive or ignitable liquid	55 gallon drum	Tight head polyethylene
Corrosive or ignitable solid	55 or 30 gallon drum	Open head polyethylene
Corrosive solids or liquids or reactives	55 gallon drum	Tight head polyethylene, open head epoxy-lined phenolic steel
Ignitable and miscellaneous	55 gallon drum	Tight head steel or tight head polyethylene
Corrosive or ignitable liquid	275 gallon tote	Tight head polyethylene
Corrosive solids or liquids or reactives	275 gallon tote	Tight head polyethylene
Ignitable and miscellaneous	275 gallon tote	Tight head polyethylene

As described in Section C, each waste stream is placed in a specific container that is compatible with the waste. The general dimensions for the 55-gallon drums used to manage hazardous waste are 22 to 24 inches diameter and 33 to 36 inches high. The 275-gallon totes are rectangular shaped with rounded edges, and the tote's base and sides are surrounded by a metal cage. The 275-gallon totes have general dimensions of 37 inches wide, 45 inches long and 36 inches tall. The 275-gallon totes are all plastic (tight head polyethylene) and the 55-gallon drums are plastic or lined steel. All containers are compatible with the wastes stored in them.

Materials generated or remaining from a production run which are to be declared a waste are placed into new or reconditioned empty containers at the end of the production run. Partially full, as well as completely full, containers are palletized and transferred to a Red Zone. When confirmation of a container's contents is obtained, the waste containers are transferred to the Plant 1 Hazardous Waste Container Storage Area. Prior to transfer to the Plant 1 Hazardous Waste Container Storage Area, hazardous wastes generated in the plants are characterized, placed in the proper containers, sealed, marked, and labeled.

Containers are transferred to the container storage area by forklift and are not stacked while being moved. Each container is inspected for proper marking, labeling, drum integrity, and seal each time it is moved as a precaution to avoid leaking and rupturing. The forklift operator accesses each storage area with a key and places ignitable and corrosive wastes in separately contained storage areas. All forklift operators who transfer hazardous waste are required to have successfully completed RCRA training as described in Section H, and Clariant forklift training.

Once in the Plant 1 Hazardous Waste Container Storage Area, waste containers are not opened except to collect a sample of the waste or to add additional waste.

The Plant 1 Hazardous Waste Container Storage Area is observed daily and inspected weekly. See Section F for more details on the inspection protocols. Containers are stored on pallets which prevents contact with standing liquids, and are stacked a maximum of two pallets high, if necessary. In the Plant 1 Hazardous Waste Container Storage Area, aisle spaces between rows are maintained at a minimum of 5 feet to provide adequate aisle space for machinery, inspections, and to meet applicable codes.

Ignitable, reactive, and incompatible wastes stored in the Plant 1 Hazardous Waste Container Storage Area are approximately 130 ft from the property line along the Catawba River. The location of the Plant 1 Hazardous Waste Container Storage Area limits the distance that can be created between the property line and containers filled with ignitable and reactive wastes. The storage area is at least 200 ft from all other property lines, except the property line bordering the Catawba River.

#### **D-1.d Special Requirements for Incompatible Wastes**

Clariant generally uses new drums for storage and shipment of hazardous waste. In cases where previously used drums are used, the used drums are reconditioned and receive a visual inspection prior to reuse. Therefore, all hazardous wastes are stored in new or reconditioned containers; hazardous wastes are not placed in unwashed containers that previously held an incompatible waste or material. Incompatible wastes or incompatible wastes and materials will not be placed in the same container.

As discussed in Section D-1a, the containment area is divided by a curb to separate ignitable and ignitable-compatible wastes from corrosive and corrosive-compatible wastes. When a container of incompatible hazardous waste requires storage on either side of the Plant 1 Hazardous Waste Container Storage Area, this waste will be stored in a compatible 55-gallon or 30-gallon container (275-gallon totes are not used for incompatible waste) and placed on a portable spill tray to act as secondary containment. The spill trays are constructed of polyethylene. Four-drum spill trays have a containment capacity of 85 gallons and measure approximately 51.5 inches by 51.5 inches by 18.5 inches. Two-drum trays have a containment capacity of 68 gallons and measure approximately 51 inches by 26.25 inches by 19 inches. Drums will not be stacked on spill trays. Spill trays with drums of incompatible waste may be placed on either side of the Plant 1 Hazardous Waste Container Storage Area. The Clariant Plant will place maximum priority on disposing of this material at a permitted disposal facility.

#### **D-1.e Air Emission Standards**

Hazardous wastes are managed in accordance with the requirements of Subpart CC. See Section CC for further details.



**SECTION G  
CONTINGENCY PLAN  
(PART B PERMIT)**

## Section G

# Contingency Plan

This section contains the Contingency Plan for the Mount Holly West Plant as required by 40 CFR 264 Subpart D and 270.14(b)(7). North Carolina has adopted these federal regulations by reference as 15A NCAC 13A.0009(e) and .0013(b). The purpose of the Contingency Plan is to minimize hazards to human health and the environment. The contingency plan will be implemented whenever there is a release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

The primary objective of the Contingency Plan is to establish appropriate and effective countermeasures in response to on-site operational emergencies that could occur at the Mount Holly West Plant. These established procedures also apply to off-site emergencies that could directly threaten hazardous waste storage at the facility. Provisions of this plan will be carried out immediately in the event of:

- Fire or explosion involving hazardous waste or hazardous waste constituents, or
- Significant, unplanned release of hazardous waste or hazardous waste constituents to the air, soil, or water.

A copy of the Contingency Plan will be maintained at the facility at all times. Additionally, copies of the Contingency Plan have been distributed to the following local authorities that may be called upon to provide emergency services or assistance: Gaston County Emergency Management, Mount Holly Volunteer Fire Department, Mount Holly Life Saving Crew, Mount Holly Police Department, First Health (Beatty Road, Belmont) and Presbyterian Hospital (Hawthorne Lane).

### G-1 General Information

This Contingency Plan applies to Clariant Corporation/Mount Holly West Plant located in Mount Holly, North Carolina. Mount Holly West is primarily a manufacturer of surfactants, chemical auxiliaries, and insect repellent. The facility, located in an industrial land-use area, is bordered on the east by the Catawba River and on the West by a multifamily residential area. The facility occupies a 40-acre site, but the majority of manufacturing activities occur in the northern 16 acres of the site.

Mount Holly West Plant hazardous waste activity includes storing hazardous waste in containers for off-site disposal. Figure G-1 is a site map showing the location of the Plant 1 Hazardous Waste Container Storage Area.



The address of the Mount Holly West Plant is:

**Clariant Corporation  
Mount Holly West Plant  
625 East Catawba Avenue  
Mount Holly, North Carolina 28120**

The owner and operator of the Mount Holly West Plant is:

**Clariant Corporation  
4000 Monroe Road  
Charlotte, North Carolina 28205**

The Mount Holly West Plant stores several types of hazardous waste in containers. Ignitable wastes (D001) are generated during surfactant production or are finished products or raw materials that have exceeded their shelf life, no longer have a viable market, or are off-specification. An example of this waste is Methanol Distillate. Corrosive wastes (D002) and ignitable/corrosive waste (D001, D002) are generated during surfactant production. Additionally, finished products or raw materials that have exceeded their shelf-life, no longer have a viable market, or are off-specification may also be declared as hazardous wastes. These waste categories are illustrated by Afilan PP press cake, which contains sodium hydroxide, and DNOBS process waste, which contains Isopar G and hydrochloric acid.

Waste code D009, mercury, is generated as a result of broken equipment, obsolete lamps, and light bulbs.

Reactive (D003) waste streams that are sometimes corrosive (D002) and/or ignitable (D001), are sometimes generated as raw materials that have exceeded their shelf lives. Waste codes D002, D007, D009, and D011 are generated from spent chemical oxygen demand (COD) vials. Waste code U122, formaldehyde, is generated during production and laboratory operations.

## **G.2 Emergency Coordinators**

If an emergency develops at the facility that requires implementing the Contingency Plan, the Emergency Coordinator on duty should be contacted immediately. The primary Emergency Coordinator or an alternative Emergency Coordinator must be at the facility or "on call" at all times. An Emergency Coordinator "on call" has a portable telephone in his possession at all times and is able to reach the facility within a short period of time (*i.e.*, normal daily commuting distance from the facility). Area employees are responsible for notifying security personnel. Security will contact the Emergency Coordinator and the shift incident commander (SIC) of the Emergency Response Team (ERT). The ERT SICs are trained in on-the-scene emergency response. The ERT SIC confirms that the Emergency Coordinator has been notified, directs ERT activities and communicates activities being carried out to the Emergency

Coordinator. The portable telephone allows the Emergency Coordinator to remain in constant communication with the plant until he arrives on site. The primary and alternative Emergency Coordinators have complete authority to commit company resources in the event of an emergency to execute the Contingency Plan.

The Emergency Coordinators are listed in Table G-1 (located at the end of this document) in priority order along with their positions, work and home telephone numbers, and home addresses. The Emergency Coordinator or their designee ensures internal alarms have been activated, ensures agencies are notified, and fulfills applicable responsibilities as defined in 40 CFR 264.56. The Emergency Coordinators receive adequate training to familiarize them with all aspects of the facility, including incident command training, an in-depth review of the Contingency Plan, a review of the plant's hazardous materials and hazardous wastes, and a review of the RCRA Part B permit and operating record. As a result, the Emergency Coordinator will be cognizant of the facility layout, contents, processes, emergency equipment, and proper emergency procedures. Table G-2 (located at the end of this document) lists organizations that may be contacted by the Emergency Coordinator in the event of an emergency.

### **G-3 Implementation**

The decision to implement the Contingency Plan depends upon whether an imminent or actual incident involving hazardous waste or hazardous waste constituents could threaten human health or the environment. This section establishes the criteria for making such a decision. In the event the Contingency Plan is implemented, the appropriate authorities will be notified. Reporting is discussed in more detail in Section G-8. The Emergency Agencies are listed in Table G-2. The Contingency Plan will be implemented in the following situations when hazardous waste or hazardous waste constituents are involved.

#### *Fire*

- A fire causes a release of toxic materials or fumes.
- A fire threatens to spread and ignite materials at other locations on-site.
- A fire could potentially cause heat-induced explosions.
- Fire fighting techniques (water or chemical) result in contaminated runoff.
- A fire threatens to spread off-site.

#### *Explosion*

- An imminent danger exists that an explosion could occur, causing a safety hazard due to flying fragments or shock waves.
- An imminent danger exists that an explosion could ignite material being stored at the facility.

- An imminent danger exists that an explosion could result in the release of toxic materials.
- An explosion has occurred.

#### *Hazardous Material Spill or Release*

A "spill" is defined in the Contingency Plan as occurring within a containment area, and a "release" is defined as occurring outside containment where constituents may migrate to soil or surface water.

- A spill or release results in the emission of ignitable or reactive liquids or vapors, thereby leading to a fire or explosion hazard.
- A spill or release emits, or could cause the emission of, toxic vapors or fumes at concentrations that could be harmful.
- A release is contained on-site, but the potential exists for ground water or surface water contamination.
- A release cannot be contained on-site, thereby resulting in off-site soil, ground water, or surface water contamination.

As an additional safety feature, the Emergency Coordinator is notified in the event of a release of a hazardous substance that exceeds its reportable quantity (RQ) under 40 CFR 302.4. A list of RQs is located at the Emergency Response Team equipment room, the South guard house, and the Communication Center (Administration Building Main Conference Room). It is understood that reporting an RQ release to the Emergency Coordinator does not necessarily activate the Contingency Plan.

## **G-4 Emergency Response Procedures**

The foremost concern during an emergency is the health and safety of site personnel and the surrounding community; thus, the procedures described in this section and the sequence of actions will be followed to the extent safely possible.

In order to readily respond to a variety of potential emergencies that may occur at a complex manufacturing facility, the Mount Holly West Plant maintains an ERT. The ERT responds to a multitude of emergency situations, including: fire, spills, chemical releases, and medical emergencies. During each shift, a SIC is on-site to lead on-scene response activities. An alternate SIC is named for each shift. All ERT carry "pagers" to ensure adequate personnel respond in the event the Contingency Plan has been implemented. An up-to-date list of all ERT personnel is maintained by the ERT Chief and is available upon request.

### **G-4.a Notification**

In an incident involving a fire, spill, or release, the discoverer will immediately notify Security. Security will contact the appropriate personnel and record the information listed in Section G-4d(2) of this Contingency Plan and remain available in the event

outside emergency or medical response assistance is necessary. All recorded information will be used as a reference log to relay information to individuals responding to the incident and during the incident review. Security will contact the on duty ERT SIC and the Environmental, Safety, and Health Department (ESHA) or Water & Waste Department. The SIC will determine whether to implement the Contingency Plan based on the criteria established in Section G-3. If the Contingency Plan is not implemented, the SIC will address the incident with Clariant ERT and/or area personnel. All incidents must be reported internally to the ESHA Department. If the Contingency Plan is implemented, the SIC will immediately direct the security personnel on duty to sound the plant alarm. The plant has three signals: a continuing pulsating siren, a steam whistle, and the Administration Building intermittent buzzer. The continuing pulsating siren and the Administration Building intermittent buzzer are the general alert signals and mean that a potential emergency exists. Plant personnel, except for ERT members who report to the ERT equipment room, will report to the in-plant area assembly points as shown in Figure G-5. When the steam whistle is sounded, immediate evacuation to the off-site assembly area is necessary. The alarm systems are activated each Thursday between the hours of 07:45 and 08:00 a.m. to ensure system function. Evacuation procedures are described in detail in Section G-7 of this Contingency Plan.

If the SIC determines that resources within the facility can address the incident, specific instructions for immediate action to the ERT will be issued, such as definition of appropriate personal protective equipment, emergency equipment, and planned response. After addressing the issues of immediate safety, the Emergency Coordinator ensures that the appropriate governmental authorities and emergency response agencies have been notified. If the SIC determines that outside assistance is necessary, the Emergency Coordinator ensures the appropriate emergency response agencies are contacted. The notification plan is presented in Figure G-2. The Emergency Coordinator is also responsible for ensuring that the ESHA Department reports the incident to the National Response Center and the regulatory agencies with the information listed in Section G-8 of this Contingency Plan, if required.

If a life threatening injury occurs, the SIC instructs security to contact the appropriate emergency response agencies, as listed in Table G-2, and takes appropriate action to prepare the injured person(s) for off-site evacuation.

#### **G-4.b Identification of Hazardous Materials**

The SIC, working with the area personnel, will immediately identify the character, source, amount, and areal extent of released materials or materials involved in a fire,

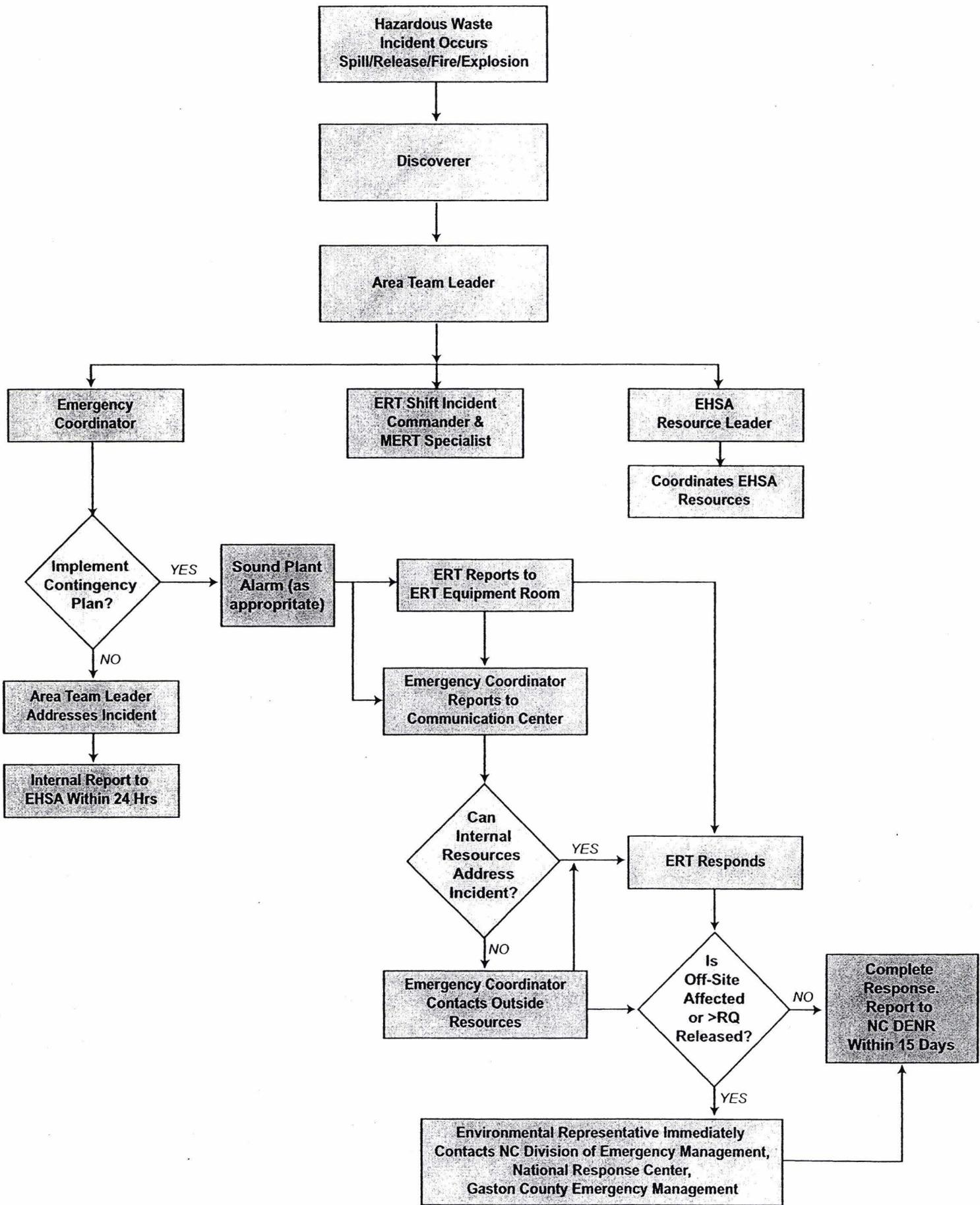


Figure G-2  
Notification Plan

leaks, or spills from hazardous waste containers. If the incident discoverer has provided this information, the SIC will confirm it. The initial identification method will be a visual inspection of the released materials and the location of the release point. Identification can also be performed by reviewing facility records or manifests. Hazardous waste storage containers are labeled as to their contents and hazard class. If for any reason released material cannot be identified visually or by location, samples will be collected for chemical analysis. Many materials handled at the facility are either ignitable or corrosive.

#### **G-4.c Hazard Assessment**

When the SIC is notified of emergency conditions, it is his responsibility to ensure an assessment of possible hazards to human health and the environment is complete. Information used to make this assessment includes MSDSs, waste analysis records, and the amount of material involved in the incident. If the SIC, with the assistance of the Emergency Coordinator, determines that the incident can be addressed with internal resources, the appropriate personal protective equipment and emergency equipment to be used. The ERT SIC coordinates the implementation of the response activities. If, after considering both direct and indirect effects of the emergency, the Emergency Coordinator determines that the facility cannot control the situation without assistance, the Emergency Coordinator or his designee will immediately notify the appropriate state and local authorities. If the release, fire, or explosion could affect human health or the environment outside the facility, appropriate local authorities must be notified immediately. Figure G-2 describes requirements for notifying authorities including the National Response Center.

A report to these authorities must include: name and telephone number of the reporter, name and address of the facility, time and type of incident, name and quantity of material(s) involved, the extent of injuries, and the possible hazards to human health or the environment outside the facility.

#### **G-4.d Control Procedures**

The initial response to any emergency will be to protect human health and safety. Identification, containment, treatment, and disposal will be of secondary concern to the primary focus of the response. ERT rescuers will remove injured persons from the hazard area, using appropriate protective gear and will administer first aid until outside medical aid arrives.

The discoverer of the incident will attempt to identify the source and quantity of material involved in the incident, shut off the source of the spill, and eliminates potential ignition sources if possible. Before evacuating the incident area, the discoverer will also attempt to extinguish any fires if an appropriate fire extinguisher is available, the appropriate training has been provided, and the situation is potentially controllable.

The following actions will be implemented when the plant evacuation signal, the steam whistle, is sounded. Plant evacuation procedures are described in greater detail in Section G-7 of this Contingency Plan.

- Roll-up fire doors in all buildings will be closed.
- All facility operations will be shut down to the extent necessary and practical.
- All chemical feed lines and equipment will be shut down as necessary and as practical.
- All personnel will leave the plant by the primary or alternate evacuation routes and report to their designated assembly area.
- ERT members will report to the ERT equipment room to respond to the incident. The Emergency Coordinator will report to the primary Communication Center located in the Administration Building Main Conference Room. The backup Communication Center is the Wastewater Treatment Plant office building.
- The senior ranking person on-site from each area will account for personnel in their areas and remain in communication with the Emergency Coordinator and the ERT SIC by two-way radio.

The following actions will be implemented when the general alert signal, the continuing pulsating siren/ Administration Building intermittent buzzer, is sounded.

- All personnel except ERT members will report to their in-plant area assembly points.
- ERT members will report to the ERT equipment room to respond to the incident. The Emergency Coordinator will report to the primary Communication Center located in the Administration Building Main Conference Room. The backup Communication Center is the Wastewater Treatment Plant office building.
- The senior ranking person on-site from each area will account for personnel in their areas and remain in communication with the Emergency Coordinator and the ERT SIC by two-way radio.
- Both the Emergency Coordinator and the SIC will develop an appropriate Action Plan to address the situation, inform the SIC and the ERT members of the Action Plan, and direct the individual area personnel to shut down their areas and evacuate the plant site (as described above for plant evacuation), return to work, or stand by for further information.
- Immediately after an emergency, the Emergency Coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

#### **G-4.d(1) Prevention of Recurrence or Spread of Fires, Explosions, or Releases**

In addition to implementing procedures described in Section G-4d, the following actions will be taken, as appropriate, in area(s) affected by the incident to prevent the

reoccurrence or spread of fires, explosions, or releases. Released wastes will be contained and collected as described in G-4d(2). Containers that may pose a threat to other containers will be isolated. Mount Holly West Plant will contract properly trained personnel to assist in collecting released wastes. These contracted personnel will remove and dispose of all collected wastes in a permitted disposal facility. Pertinent personnel receive training to properly perform these actions.

### *Fires and Explosions*

Ignitable hazardous wastes are managed at the facility in the Plant 1 Hazardous Waste Container Storage Area. Many raw materials and products are also ignitable. The hazardous waste unit and storage areas for raw materials and products are accessible by fire-fighting and other emergency equipment. A paved blacktop road, immediately adjacent to each of these areas, is kept clear at all times.

The following actions will be implemented in the event of a fire, explosion, or potential explosion.

- The site general alert signal, continuing pulsating alarm/ Administration Building intermittent buzzer, will be sounded.
- All personnel, except ERT members, will report to their in-plant area assembly points.
- ERT members will report to the ERT equipment room to respond to the incident. The Emergency Coordinator will report to the primary Communication Center located in the Administration Building Main Conference Room. The backup Communication Center is the Wastewater Treatment Plant office building.
- The senior ranking person on-site from each area will account for personnel in their areas and remain in communication with the Emergency Coordinator and the ERT SIC by two-way radio.
- Both the Emergency Coordinator and the SIC will develop an appropriate Action Plan to address the situation, inform the SIC and the ERT members of the Action Plan, and direct the individual area personnel to shut down their areas and evacuate the plant site (as described above for plant evacuation), return to work, or stand by for further information.
- The Action Plan will include measures that, where applicable, stop processes and operations, collect and contain release waste, and remove or isolate containers.

If total site evacuation is deemed to be appropriate, the plant will sound the evacuation signal (*i.e.*, the steam whistle). ERT members will report to the ERT equipment room whenever an emergency signal is sounded. At the ERT equipment room, members will be briefed concerning the emergency and the planned response action. Personal protective equipment and emergency equipment are located at the ERT equipment room and at other locations on the plant site as discussed in Section G-5 of this Contingency Plan. The primary responsibility of the ERT fire unit is to

protect personnel and property. If the fire cannot be extinguished readily with on-site equipment (such as fire extinguishers, sprinkler systems, or fire monitors), efforts will focus on containing the fire and preventing its spread to nearby areas. If possible, noninvolved containers will be moved from the area. ERT fire unit members will continue this effort until outside assistance has arrived.

If the facility stops operation in response to a fire, explosion, or release, the ERT must monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment.

If a highly volatile material that constitutes a potential explosion hazard is released, all persons within at least a 1/4-mile radius will be notified. Off-site notifications and/or evacuations will be conducted by the City of Mount Holly Police Department. All ignition sources within the hazard area will be eliminated. Motor vehicle traffic will be restricted or eliminated to avoid a possible flashback to the source. If the potential for an explosion is high, all people within a 1/2-mile radius will be evacuated. If a fire evolves that generates toxic fumes or smoke, people will be evacuated up to a 1/2-mile downwind. The security guard will respond only to the calls necessary to handle the emergency.

Spills or releases of ignitable or combustible hazardous wastes are also a potential fire hazard and will be treated as a fire emergency. All potential sources of ignition will be eliminated from the spill/release area. Vehicular traffic and material transfers in the area will cease until the spill is contained and the safety of resuming operations is ensured. Under the direction of the SIC, the units will respond with hoses and with alcohol-resistant foam mixing and application units. The foam is an AFFF (Aqueous Film Forming Foam). Additional information concerning emergency procedures and precautions for specific hazardous materials used at the facility is included in the MSDSs, which are filed electronically.

#### **Hazardous Waste Container Storage, Plant 1**

- Spark-producing equipment will be kept away from the area.
- Traffic will be halted in Plant 1.
- Unnecessary personnel will be evacuated from the Plant 1 tank farm, truck dike (adjacent to the Plant 1 Hazardous Waste Container Storage Area).

#### **Production Areas**

- Stop all chemical additions, such as acids, bases, epichlorohydrin, ethylene oxide (EO) or dimethylsulfate.
- Turn down set points and stabilize all batches with heat.
- Turn off all electrical equipment, such as agitators or pumps, which is not necessary to maintain process stability.
- Close all doors in the area.

- Shut down EO or propylene oxide flow (Plant 4).
- Put nitrogen purge on all reactors (Plant 4).
- Maintain full cooling on exothermic reactions.
- Shut down the steam flow (Plant 4).
- Shut down all pumps and discontinue material transfers in tank farms. Close all hand valves and dike valves.
- Shut down all material transfer operations in truck loading/unloading areas. Secure all tank manways, valves, pumps, and transfer hoses.

### Laboratories

- Shut the main valves on all gas cylinders except for nitrogen.
- Turn off all electrical equipment, such as stirrers, hot plates, or mixers.
- Close all fume hoods and shut off the exhaust blowers.
- Stop all chemical additions or reactions.
- Close all doors unless otherwise instructed.

### Maintenance Shop

- Stop all cutting, grinding, and welding operations.
- Shut the main valves on all gas cylinders.
- Secure all electrical equipment.
- Close the doors, but leave the outside doors unlocked in case equipment is needed.

### Warehouse

- Turn off all fork lifts.
- Disconnect battery chargers.
- Stop all drumming and transfer operations; and secure valves, pumps, and hoses.
- Close all doors.

### Other Areas

- Proper use of fire doors, appropriate sprinkler systems, fire monitors, and diesel engines, fire hydrants, and fire extinguishers.

If the facility stops operations in response to an emergency, the ERT members will monitor valves, pipes, and other equipment for leaks, pressure build-up, gas generation, or ruptures. These will be reported to the Emergency Coordinator. Procedures to collect and dispose of released materials are discussed in Section G-4d(2).

#### G-4.d(2) Container Spills and Leakage

In the event of an incident involving a major chemical spill or release, the following general procedures will be followed to ensure rapid and safe response to the situation. Information concerning emergency procedures and precautions for specific hazardous materials used at the facility is included in the MSDSs.

When a spill or release is discovered, it is the responsibility of security to report the following information to the Emergency Coordinator:

- The material spilled or released;
- The location of the spill or release and the measures taken to contain it;
- An estimate of the quantity released and the rate at which it is being released;
- The direction in which the release is heading (*i.e.*, storm sewer, dike, loading area, industrial sewer, river, etc.);
- Any injuries involved;
- Any potential fire or explosion hazards;
- Adjacent areas or materials involved that could cause a reaction, fire, or explosion; and
- The names of persons involved in communication of the emergency to include as applicable: the discoverer, the area Team Leader, security person contacting emergency personnel, the ERT SIC, and the ERT member.

In the event that a release occurs to the industrial sewer, the spill can be diverted to a 400,000-gallon Spill Tank. The area Team Leader or designee will inform WWTP personnel that a release to the industrial sewer has occurred. WWTP personnel will divert wastewater flow to the 400,000-gallon Spill Tank and then sample the contents of the tank to determine whether the material can be treated in the WWTP or if it must be shipped off-site for disposal within a 90-day period. Incompatible materials will not be commingled in the Spill Tank.

A chemical release will be contained and isolated using the spill control equipment listed in Section G-5. The area of isolation will depend on the size and nature of the release. The area will be roped or blocked off; only those people involved in performing containment and control operations will be allowed within the designated hazard area. If the release reacts with other materials or ignites, resulting in the generation of a toxic cloud, the isolation area will be extended to include the plant area and the residential areas up to one-half mile downwind of the plant. These efforts will be coordinated with the City of Mount Holly Police Department.

Fire is a potential hazard with spills and releases of ignitable or combustible materials; therefore, all potential sources of ignition will be eliminated. Vehicular traffic and material transfers in the area will cease until the spill is contained and the safety of

resuming operations is ensured. Under the direction of the ERT SIC, the ERT fire unit will respond with foam equipment and hoses.

The NC DENR, the National Response Center, and the Local Emergency Planning Committee will be notified immediately if one of the following occurs.

- The release is beyond the control of the ERT spill unit and local response groups.
- An RQ release occurs.

The following general guidelines will be used in case of an accidental spill or release involving hazardous waste. The nature of the material and conditions may warrant alternative steps or procedures.

Spill or releases involving damaged, corroded, or leaking drums will be addressed in the following manner:

- The material will be transferred to another compatible container if possible.
- A drum hoist will be used to place the drum in an overpack, if necessary.
- The new container or overpack will be inventoried for off-site disposal.
- The empty damaged container will also be submitted for off-site disposal.
- The released material will either be transferred directly into a compatible container, or absorbent material will be used to collect the released material and the absorbent will be transferred into a compatible container.
- Spilled or released waste will be removed from the secondary containment system in as timely a manner as is necessary to prevent overflow of the containment system.
- Once the spilled material is removed, the containment system will be rinsed and the rinse water will be managed as necessary.

Large spills or releases resulting from a tank, pump, or pipeline are reported immediately to the area Team Leader or appropriate alternate management person. The following information is reported to security:

- The material spilled or released;
- The location of the spill or release and the measures taken to contain it;
- An estimate of the quantity released and the rate at which it is being released;
- The direction in which the release is heading (*i.e.*, storm sewer, dike, loading area, industrial sewer, river, etc.);
- Any injuries involved;
- Any potential fire or explosion hazards;

- Adjacent areas or materials involved that could cause a reaction, fire, or explosion; and
- The name of the SIC, area Team Leader, and individual who initially contacted the Emergency Coordinator.
- The names of persons involved in communication of the emergency to include as applicable: the discoverer, the area Team Leader, security person contacting emergency personnel and the ERT SIC.

Security will perform the following:

- Contact the Emergency Coordinator on duty, and report the above information.
- Contact the ERT SIC, and report the above information.
- Contact ESHA Department, and report the above information, as directed by the Emergency Coordinator and/or the SIC.

The Emergency Coordinator will ensure the following:

- Initiate the evacuation of the site as necessary based on the size of the release and material involved. Keep all personnel upwind of the spill or release.
- Obtain medical attention for any injured personnel. Notify the area Team Leader or caller to contact the ERT medical unit to begin first-aid treatment.
- Contact the local rescue squad and hospital and advise each of the situation, the material involved, and the degree of injury.
- Contact the local fire department if a fire is involved and cannot be extinguished or contained by plant personnel.
- Dispatch ERT members to the site to take appropriate action.
- Ensure that necessary notifications and reports are made.

The ERT SIC and ERT members will perform the following:

- Ensure that all unnecessary people are removed from the hazard area.
- Put on protective clothing and equipment.
- Remove all sources of ignition if ignitable materials are involved. Employ explosion-proof equipment and clothing during containment and cleanup operations.
- Minimize or stop the leak, spill, or rupture, if possible.
- Identify potentially reactive materials in the incident area, and remove them if possible.
- Use absorbent pads, earth, sandbags, and other inert materials to contain, divert, or clean up a spill if it cannot be contained within a dike or sump.

- If a release reaches the storm sewer, contain the released material in the nearest catch basin, divert the flow to the industrial sewer, or dam the outfall to the Catawba River, using sandbags, earth, or pipe plug. Pump the released material into drums or other appropriate containers using air pumps, portable pumps, or vacuum tankers.
- Transfer all containment and cleanup materials into proper drums for disposal. ERT members will reference Section G-5 for available emergency equipment.

ESHA Department personnel will perform the following:

- Contact proper authorities if the spill or release is large or an RQ is exceeded. An RQ is defined under CERCLA Section 103(a), and is reported according to CERCLA and EPCRA Section 304. Contact local authorities so that downstream water users and/or persons downwind of the vapor can be notified and evacuated as necessary.

Clean up of spills and releases that enter the 400,000-gallon Spill Tank or secondary containment must be characterized, handled, and disposed of in accordance with local, state, and federal regulations. Secondary containment includes Plant 1 Hazardous Waste Container Storage Area, truck loading/unloading dikes, and stormwater outfall containment areas. Spilled or released waste will be removed from the 400,000-gallon Spill Tank and/or secondary containment in as timely a manner as is necessary to prevent overflow of the system. The following procedure will be followed:

- Only personnel receiving proper training will be authorized to handle the hazardous waste.
- Samples will be obtained for characterization. The information and a sample if necessary will be submitted to permitted disposal facilities for disposal authorization.
- The material will be removed from the 400,000-gallon Spill Tank and/or secondary containment into bulk tankers by means of a vacuum tanker or into drums compatible with the waste via an air driven pump.
- The bulk tanker and/or hazardous waste drums will be properly labeled, marked, sealed, and inventoried.
- The drums will be manifested for off-site disposal when disposal authorization is received from a permitted disposal facility.
- The NC DENR Hazardous Waste Section will be notified in writing when the removal of the hazardous waste from the Mount Holly West Plant is complete.

Soil contaminated with hazardous wastes must be cleaned up, characterized, handled, and disposed of in accordance with local, state, and federal regulations. The following procedure will be followed:

- Submit clean up action plan to NC DENR Hazardous Waste Section for review and approval.
- Only personnel receiving proper training will be authorized to handle the hazardous waste.
- The waste will be removed, placed into lined containers, and covered.
- Samples will be obtained for characterization. The information, and a sample if necessary, will be submitted to permitted disposal facilities for disposal authorization.
- The lined container(s) will be properly labeled, marked, and inventoried.
- The lined container(s) will be manifested for off-site disposal when disposal authorization is received from a permitted disposal facility.
- Sample remaining soil to confirm clean up is complete per the action plan submitted to NC DENR Hazardous Waste Section.
- The Hazardous Waste Section will be notified in writing when the removal of the hazardous waste from the Mount Holly West Plant is complete.

#### **G-4.d(3) Tank Spills and Leakage**

The Clariant Mount Holly West facility does not have any regulated tanks. The facility does have tanks as part of the manufacturing operations, and the spill and leakage procedures for tanks is similar to that of containers (see Section G-4d(2)). The procedures for responding to tank spills or leakages include cessation of the use tanks; removal of waste from the tank system within 24-hours of leak or spill detection (if possible); removal of waste from secondary containment within 24-hours of leak or spill detection (if possible); prevention of further migration of leak or spill to soils or surface water; and removal and disposal of visibly contaminated soil or surface water. Leaks or spills of hazardous waste will be reported to the department within 24-hours of detection with the exception of leaks or spills that are less than one pound or immediately contained and cleaned up. Within 30 days of detection of a release of hazardous waste to the environment, Clariant will notify NCDENR of the release including the following information: likely route of migration of the release; characteristics of the surrounding soil; sampling results; proximity to downgradient drinking water, surface water, and populated areas; and description of the response actions to be taken. Any tanks found to be damaged will be repaired or removed from service.

#### **G-4.e Incompatible Wastes**

The Emergency Coordinator, in conjunction with Water & Waste Department personnel, will ensure that waste that may be incompatible with released material will be stored in a separate area until cleanup is complete. The temporary storage area will be apart from the cleanup areas and will meet regulatory standards for less than 90 day storage.

## **G-4.f Storage and Treatment of Released Materials**

Following an emergency, the Emergency Coordinator, or Water & Waste Department personnel under his direction, will make arrangements for proper treatment, storage, or disposal of recovered waste and any other contaminated material. Provisions for containing, storing, and disposing the waste are discussed in Section G-4d(2).

Equipment that is readily available is referred to in Section G-5. Mount Holly West Plant has five strategically placed stormwater control valves (001, 003, 004, 005, and 007) to prevent surface water contamination from reaching the Catawba River. In the event surface waters or soils are contaminated, Mount Holly West Plant will contract an off-site emergency response team to assist in containing the material to the best possible extent. Once the material is contained, an assessment will determine the most practical way to clean up and dispose of the material. All waste cleaned up will be disposed of in an off-site permitted facility in a timely manner.

## **G-4.g Post-Emergency Equipment Maintenance**

After an emergency, any emergency equipment listed in Section G-5 that was used during the emergency will be cleaned for reuse or replaced. Before operations are resumed, an inspection of all safety equipment will be made. Appropriate State and local authorities will be notified that post-emergency equipment maintenance is complete before operations are resumed in the affected areas of the facility.

## **G-5 Emergency Equipment**

The location of emergency equipment at the Mount Holly West Plant is shown on Figures G-3 and G-4. Mount Holly-West maintains several emergency response systems, including alarm systems, spill and fire control equipment, and other emergency supplies and equipment as described in the following sections.

### **G-5.a Spill Control Equipment**

- Industrial absorbents - at least one bag stored in each plant area; several bags in warehouse
- Encapsulated Emergency Response Suits
- Sandbags - at least two bags stored near each storm water outfall (#001 and #003)
- Absorbent pads - at least one carton stored in warehouse
- Spill control kits - at least one each for acids, bases, and solvents in each laboratory
- Recovery drum - at least 10 on the plant site
- The following are available as "Spill Control Kits" at the Plant 1 Hazardous Waste Container Storage Area as shown in Figure G-3: overpack container, absorbents, absorbent boom, shovel, rake, sweep and push brooms, gloves.

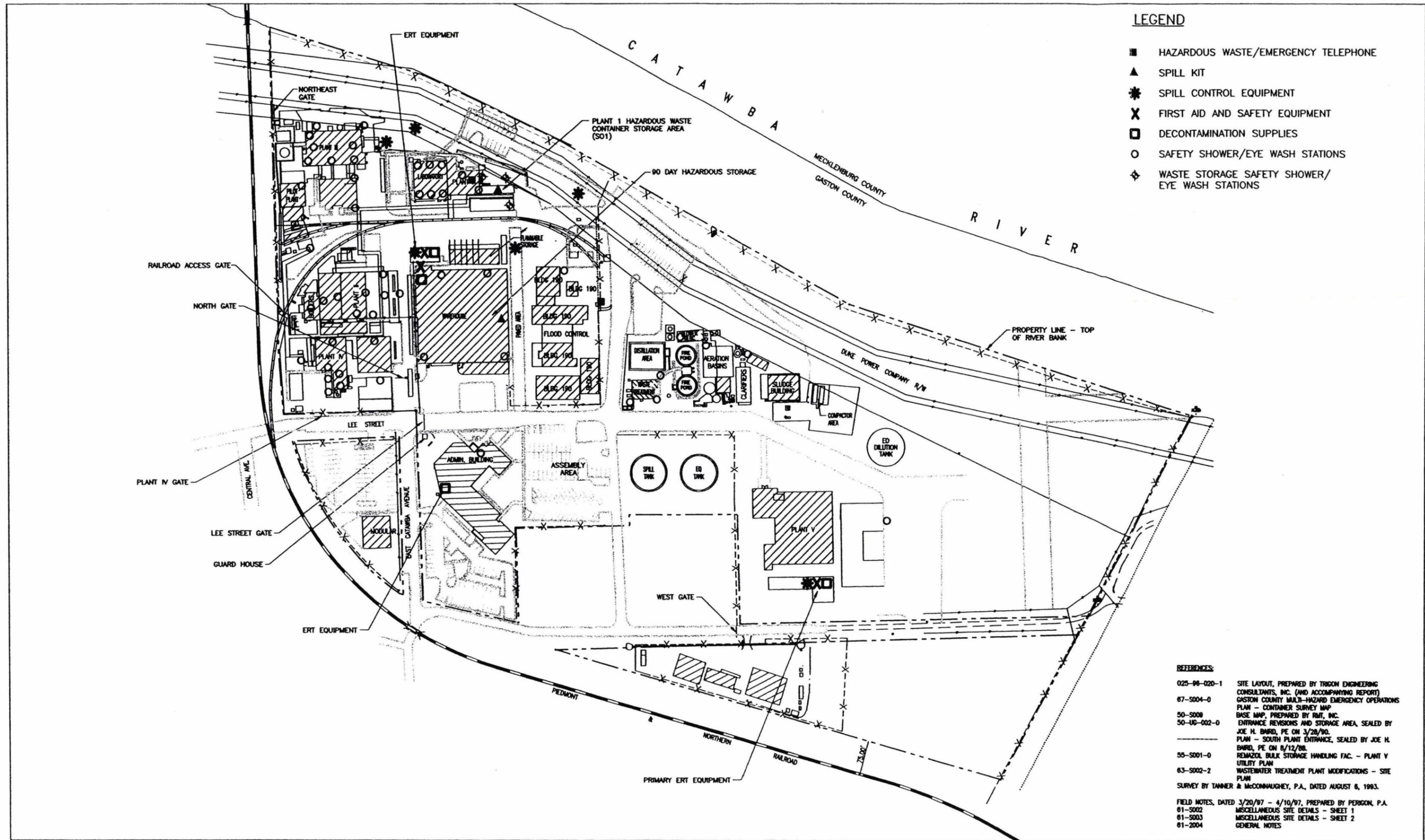


Figure No. G-3  
LOCATION OF SAFETY EQUIPMENT

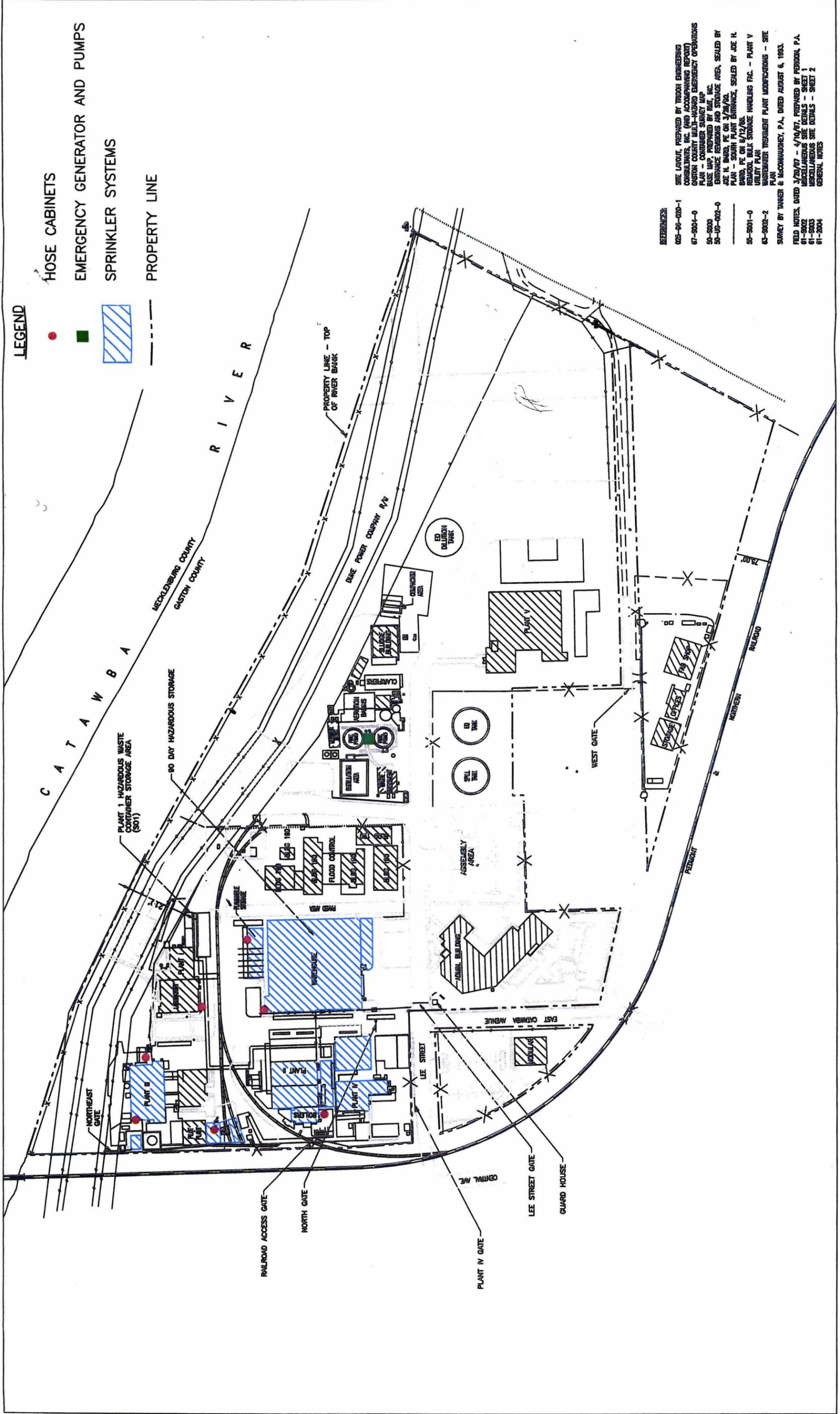


Figure No. G-4  
 LOCATION OF FIRE MONITORING  
 AND CONTROL EQUIPMENT

### **G-5.b Fire Control Equipment**

- Fire monitors - locations as shown in Figure G-4; supplies 500 gpm
- Fire hydrants - as shown in Figure G-4; supplies 1,000 gpm
- Detergent/scrub brushes/buckets, to remove water soluble materials - located in ERT equipment room
- Pool, additional secondary containment for decontamination rinse water - stored in ERT equipment room
- Portable shower, rinse detergent and chemicals during decontamination - stored in ERT equipment room
- Vinyl gloves/over-sized rubber boots, personal protective equipment used during decontamination - stored in ERT equipment room
- 100-foot garden hose, used to supply rinse water - stored in ERT equipment room
- Additional equipment may be located in the ERT equipment room.
- Hose cabinets - locations as shown in Figure G-4; 250 feet of hose each, fire axe, nozzles and adapters, spanner wrenches, rubber washers, hydrant wrenches, pinch bars, hose hangers
- Automatic Sprinkler System - locations as shown on Figure G-4
- Portable fire extinguishers - dry powder, halon, alcohol-resistant foam, and CO<sub>2</sub>;
- Diesel engine-driven Johnston vertical turbine pump - 2,000 gpm capacity at 307 feet total dynamic head (TDH)
- Diesel engine-driven Marathon generator - 125 KW/156 KVA, 188 amps maximum
- Wheeled dry chemical extinguisher - stored inside Plant 2

### **G-5.c Personal Protection Equipment**

- Plastic and rubber aprons and gauntlets
- Rubber, PVC, and neoprene boots
- Short and long rubber gloves
- Rain suits
- Chemical resistant suits (Tyvek, PVC, neoprene)
- Face shields, chemical goggles
- Scott Air Packs; pressure-demand type (SCBA)
- Portable Supplied Air Breathing Unit; pressure-demand type

### **G-5.d First-Aid and Medical Supplies**

- Safety Equipment - as shown in Figure G-3; includes bandage materials, antibacterial and burn ointments, analgesics, anesthetics, disposable gloves, eyewash bottle and solution, and chemical neutralizing solutions
- ERT Portable Cart - stretcher, burn sheets, sterile water, oxygen cylinder with administration/delivery devices, splints, ice packs, sphygmometer, and stethoscope
- Emergency eyewash and shower stations - locations as shown in Figure G-3. As shown in the figure, eyewash/shower stations are located near the Plant 1 Hazardous Waste Container Storage Area.

### **G-5.e Emergency Decontamination Equipment**

- Detergent/scrub brushes/buckets, to remove water soluble materials - located in ERT equipment room
- Pool, additional secondary containment for decontamination rinse water - stored in ERT equipment room
- Portable shower, rinse detergent and chemicals during decontamination - stored in ERT equipment room
- Vinyl gloves/over-sized rubber boots, personal protective equipment used during decontamination - stored in ERT equipment room
- 100-foot garden hose, used to supply rinse water - stored in ERT equipment room
- Additional equipment may be located in the ERT equipment room.

### **G-5.f Emergency Communication and Alarm Systems**

- Steam Whistle - A manually operated 1.5-inch by 4-inch DART whistle is located in the pipe rack on the West side of Plant 1.
- Continuing Pulsating Siren - The pulsating siren can be manually operated from the Security Station. The siren is automatically activated when there is a pressure drop in the fire water distribution system, which activates diesel firewater pumps.
- Administration Building Buzzer - The buzzer is automatically activated when the Plant's pulsating siren is activated or the building's fire alarm pull station is activated.
- Telephones - Telephones are located throughout the site and can be used for both internal and external communications. Telephones specific to hazardous waste management and emergency response are located at the main gate and near the Plant 1 Hazardous Waste Container Storage Area as shown in Figure G-3.

## G-6 Coordination Agreements

Mount Holly West has provided copies of the Contingency Plan to the organizations listed below. Copies of the signed coordination agreements are included in Appendix G-1. None of the organizations have explicitly refused to provide emergency services to the Mount Holly West Plant.

Organization	Contact	Address	Telephone
Mount Holly Volunteer Fire Department	Fire Chief Mark Allman	309 North Main Street, P.O. Box 406 Mount Holly, NC 28120	(704) 827-2424
Mount Holly Life Saving Crew	Captain Mark Sigmon	307 North Main Street, P.O. Box 406 Mount Holly, NC 28120	(704) 827-6611
CaroMont Occupational Medicine Clinic	Dr. Alex Sanchez	705 Summit Crossing Place, Ste. 150 Gastonia, NC 28054	(704) 671-7800
Gastonia Memorial Hospital	Dr. Alex Sanchez	2525 Court Drive Gastonia, NC 28054	(704) 834-2266
Presbyterian Hospital	Ms. Kathy Stith	200 Hawthorne Lane Charlotte, NC 28123- 3549	(704) 384-5163
Gaston County Emergency Management	Mr. Jim Pharr Director	P.O. Box 1578 Gastonia, NC 28053	(704) 866-3355
NC DENR Hazardous Waste Management Division	Mr. Karim Pathan	1646 Mail Service Center Raleigh, NC 27699- 1646	(919) 733-2178 Ext. 228
NC DENR Hazardous Waste Management Division	Mr. Larry Fox District Representative	919 N. Main Street Mooresville, NC 28115	(704) 663-1699
Mount Holly Police Department	Police Chief Benson Hoyle	125 East Charlotte Avenue P.O. Box 406 Mount Holly, NC 28120	(704) 827-4343

## G-7 Evacuation Plan

The following evacuation procedure will be followed in the event that an emergency requiring facility evacuation occurs. The Emergency Coordinator will adhere as closely as possible to the evacuation plan, but he has the full authority to deviate from the plan if the actual situation warrants such a deviation. The Emergency Coordinator is responsible for determining which emergencies require facility evacuation.

The following criteria will be considered in making the decision to evacuate the facility:

- Have the parameters of the incident been confirmed?
- Is the incident isolated or limited in extent?
- What is the level of threat posed by the materials involved?
- What extent of the facility is potentially affected?
- How do current meteorological conditions affect the situation?

If an incident, as defined in Section G-3, occurs whose parameters are not confirmed, which is determined to be isolated to a specific area of the plant, and which does not appear to pose a threat to human health or the environment, the Emergency Coordinator will ensure that the general alert (continuing pulsating siren/ Administration Building intermittent buzzer) is sounded. Personnel will respond as described in Section G-4a. A partial evacuation of the isolated portion of the plant affected by the situation may be required. The Emergency Coordinator will make the necessary notification to appropriate area personnel that a partial evacuation is ordered.

If the incident cannot be isolated and the Emergency Coordinator concludes that the incident may threaten human health or the environment, the steam whistle will be sounded, signaling a full plant evacuation.

The internal telephone system or plant two-way radio is used to report an emergency situation to Security. Security personnel contact the Emergency Coordinator on duty or on call and report the known information concerning the type, location, and extent of the emergency. Security personnel ensure that the alarm is sounded. Area personnel are informed of the emergency and are issued instructions by two-way radio from the Communications Center.

When the plant evacuation steam whistle is sounded, the following actions will be initiated:

- 1) The security guard on duty will perform the following:
  - Immediately open main gate and close all other gates to control entry and exit from the plant.
  - Permit only emergency vehicles to enter the plant.
  - Stop all vehicular traffic within the plant to allow exit of personnel and movement of emergency equipment.
- 2) All personnel, visitors, and contractors will immediately report to the assembly area. There are two main evacuation routes, each leading to the assembly areas as shown on Figure G-5.
- 3) All personnel will report to their designated location in the assembly area to be accounted for by their area Team Leader or designee.

- 4) No personnel will remain in the plant or re-enter the plant unless authorized by the Emergency Coordinator.
- 5) During evacuation procedures, the area employees will remain together in their designated assembly area. The assemble point is shown in Figure G-5. After assembly, the senior ranking person on site from each area will determine which personnel are unaccounted for and convey this information to the Emergency Coordinator or security guard. All personnel will remain at the assembly area until the "All Clear" signal, which is two short blasts on the stem whistle, is given, or they are instructed otherwise by the ERT.
- 6) Office personnel, plant engineers, and maintenance supervisors who have contractors or visitors on-site are responsible for evacuating and accounting for these people.
- 7) The names of ERT members involved in handling the emergency situation will be reported to the Communications Center.
- 8) A final tally of personnel will be made by the Emergency Coordinator, or designee, who is located at the Communications Center. The security guard will assist the Emergency Coordinator in accounting for personnel.
- 9) Truck drivers are the responsibility of the warehouse supervisor or the area supervisor where the truck is being loaded/unloaded.
- 10) Re-entry into the plant area will be allowed after clearance by the Emergency Coordinator and the "All Clear" signal is given.

## G-8 Required Reports

As specified in 40 CFR 264.56(j), any emergency that requires implementation of the Contingency Plan will be reported in writing within 15 days to the North Carolina Department of Environment and Natural Resources, Hazardous Waste Section.

- The report will include the following information, which will also be entered into the operating record:
  - The name, address, and telephone number of the owner or operator of the facility;
  - The name, address, and telephone number of the facility;
  - The time, date, and type and details of incident;
  - The name and quantity of the materials involved;
  - The extent of injuries, if any;
  - An assessment of actual or potential hazards to human health or the environment; and
  - The estimated quantity and disposition of recovered material resulting from the incident.

The Mount Holly West Plant has internal reporting requirements in addition to those listed above. All incidents of the following nature must be reported to ESHA Department within 24 hours of the incident:

- Fires
- Chemical spills
- Injuries requiring more than first aid
- Releases of toxic fumes, gases, or vapors
- Releases from rupture discs

An investigation of the incident will be completed in a timely manner. Investigation reports are kept on file in the ESHA Department file room.

## **G-9 Amendment to Contingency Plan**

This Contingency Plan will be reviewed and amended as necessary if:

- The facility permit is revised,
- The Contingency Plan fails in an emergency,
- The facility changes in any way that materially increases the potential for emergency situations or changes in the response necessary in any emergency,
- The list of emergency coordinators changes, or
- The list of emergency equipment changes.

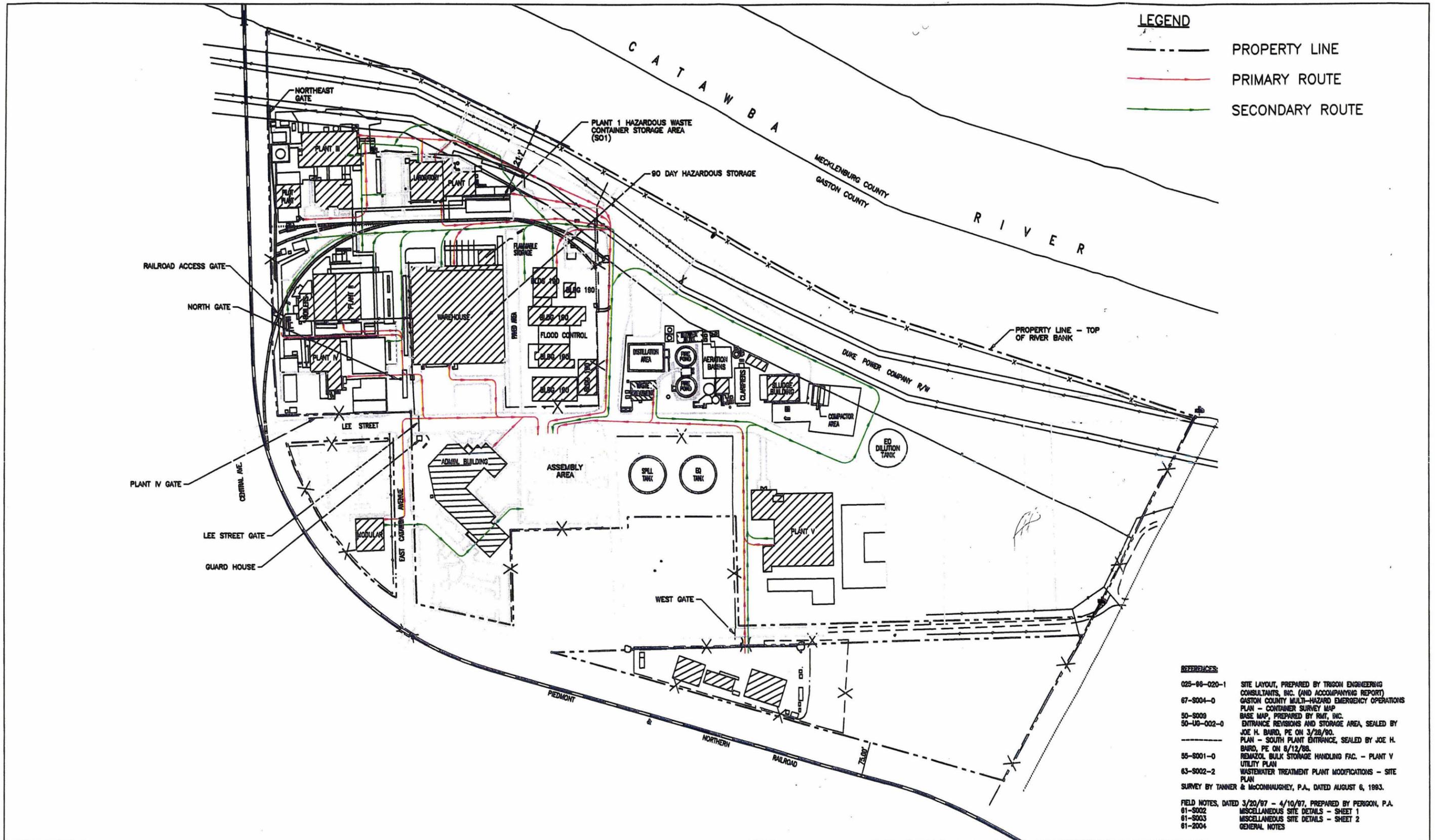


Figure No. G-5  
Evacuation Routes

**Table G-1 Emergency Coordinators**

NAME	POSITION	TELEPHONE	HOME ADDRESS
PRIMARY EMERGENCY COORDINATOR			
Pollard, Andre	ESHA Department Manager	(H) (704) 660-5673 (W) (704) 822-2113	310 Whippoorwill Road Mooresville, NC 28115
ALTERNATIVE EMERGENCY COORDINATORS			
Covill, Jim	Production & Technology Director	(H) (704) 846-7386 (W) (704) 822-2106	12434 Tolland Lane Charlotte, NC 28277
Willner, Joe	Operations Leader	(H) (704) 598-6518 (W) (704) 822-2533	5948 Prescott Court Charlotte, NC 28269
Baden, Bob	Technical Manager	(H) (803) 547-0617 (W) (704) 822-2626	11136 Scullers Run Tega Cay, SC 29708
Byerley, Ray	Engineering Leader	(H) (704) 877-2330 (W) (704) 822-2115	P O Box 1307 Huntersville, NC 28070
Archer, Bill	Site Services Manager, Mount Holly East Plant	(H) (704) 366-0506 (W) (704) 822-2702	425 Hunter Lane Charlotte, NC 28211

**Table G-2 Emergency Agencies**

Emergency Type	Agency	Telephone Number	
		Emergency	Direct Line
Injury	CaroMont Occupational Medicine Clinic		(704) 671-7800
	Gaston County EMS	911	(704) 866-3355
	Gaston Memorial Hospital ER		(704) 834-2266
	Presbyterian ER (Charlotte)		(704) 384-4160
	Poison Control Center (Charlotte)		(704) 379-5827
Fire/Explosion	Dispatch for County	911	(704) 866-3300
	Mount Holly Fire Department	911	(704) 827-2424
Utilities/Services	Duke Power Co.		(800) 769-3766
	Public Service Co.		(704) 825-3315 or (704) 865-2751
	Mount Holly Water Supply		(704) 822-2928
	Mount Holly Waste Treatment		(704) 827-4261
	Mount Holly City Hall		(704) 827-3931
	Belmont Water Supply		(704) 825-2625
Police Departments	Mount Holly	911	(704) 827-4343
Rescue Squads	Mount Holly Life Saving Crew	911	(704) 827-6611
	Gaston County Emergency Management	911	(704) 866-3355 or (704) 866-3300
NC DENR Air Quality Section District Office Hazardous Waste Section  NC Division of Emergency Management (SERC)  EPA Region IV  NC OSHA OSHA  Charlotte Emergency Management  National Response Center  Chemtrec			(919) 733-4984 (919) 733-3340 (704) 663-1699 (919) 733-4996 or (919) 733-2178
			(919) 733-3867 or (800) 662-7956
			(404) 347-7603
			(919) 733-2360 (919) 856- 4790
			(704) 336-2461
			(800) 424-8802
			(800) 424-9300