

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

COMPREHENSIVE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Facility Name: Loparex Inc.
EPA ID Number: NCR 000 001 255
Type of Facility: LOG
Facility Location: 816 Fieldcrest Road, Eden, NC 27288
Telephone Number: 336-627-6430 Fax: 336-627-6492

2. FACILITY CONTACT: David Maust – Process Engineer
david.w.maust@loparex.com

3. SURVEY PARTICIPANTS: David Maust (Loparex), Tim Ritter – Plant Engineer (Loparex), Todd Dennison – Production Team Leader (Loparex), and Jenny Patterson (NCDENR)

4. DATE OF INSPECTION: October 26, 2005

5. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279 and to provide guidance as needed with the hazardous waste management requirements. The last CEI was performed on January 20, 2004.

6. FACILITY DESCRIPTION:

Loparex operates as a manufacturer of coated products (“release liners” and “backing sheets”) made primarily by coating and drying various materials onto paper substances. Typical materials coated on paper are polyethylene, polypropylene, silicone and some plastic films.

7. WASTE STREAMS INCLUDE:

Hazardous waste is generated from the flushing of lines, mismixed batches and leftover or cured products. Typical solvents used are toluene, alcohols, heptane, naphtha, and other similar solvents. The following waste streams were noted during the inspection:

- D001/D035/F003/F005 – waste flammable liquids (toluene, naphthalene), “Wash up coating”, “Pumpable waste”
- D001/D035/F003/F005 – waste flammable solids (toluene, isopropyl alcohol), Non-pumpable solid waste”
- D009 – mercury contaminated waste (lamps)
- D039 – waste petroleum naphtha from the one on-site parts washer

Other waste streams generated at the facility include:

Used oil and universal waste are also generated and managed at the facility.

8. AREAS OF REVIEW AND INSPECTION:

- **Emergency Preparedness:** Emergency preparedness requirements are met.

- **Contingency Plan:** The Contingency Plan meets all requirements.
 - **Inspection Records (storage):** Facility performs weekly inspections and documents them on a form. Three years of inspection records are kept on-site.
 - **Manifests / LDR:** Manifests were reviewed from calendar years 2004 and 2005. All manifests were in order with signed copies. Land ban notifications were also reviewed.
Transporters and TSDs for calendar year 2004 and 2005 included:
 - Transporters:** Freehold Cartage – NJD054126164
Safety Kleen – TXR000050930 (parts washer waste)
 - TSD's:** Southeastern Chemical – SCD036275626
Safety Kleen – NCD077840148 (parts washer waste)
 - **Training Records:** RCRA training was last performed on 11/12/04. Training records include job titles and descriptions.
 - **Biennial Report:** Submitted March 4, 2004
 - **Accumulation Areas:** There three satellite accumulation areas at the facility. They are described as follows:
 - a) **Mix Room Satellite Accumulation Container 1:** One 55-gallon container for the accumulation of hazardous waste liquid. The container was observed in compliance.
 - b) **Mix Room Satellite Accumulation Container 2:** One 55-gallon container for the accumulation of hazardous waste solids. The container was observed in compliance.
 - c) **Pumpable Coatings Accumulation:** One 55-gallon container for the accumulation of hazardous waste liquids.
 - **Storage Areas:** The facility has one less than 90 day storage area described as follows:
 - a) **Storage Area:** This storage area is located inside the facility's main building. On the day of the inspection there were sixty one 55-gallon containers of hazardous waste in the storage area. The hazardous waste containers in the storage area were observed in compliance. All storage area requirements were met.
 - b) **Used Oil:** Used oil is accumulated in the maintenance shop. On the day of the inspection there were three 55-gallon containers of used oil observed in this area.
9. **WASTE MINIMIZATION:** A waste minimization plan is in place. The facility indicates that one of their waste minimization efforts includes changing from manual batching to semi-automatic batching which helped with producing more consistent batches. The facility also started using smaller mixing pots which created less waste if an error was made in a batch.
10. **SITE DEFICIENCIES:** There were no deficiencies noted during the October 26, 2005 inspection.
11. **RECOMENDATIONS:** The following recommendations are offered as part of the compliance inspection conducted on October 26, 2005:
- 1) Ensure compliance with the Used Oil regulations (40 CFR 279). Specifically, ensure that all used oil containers are labeled "Used Oil".

- 2) Ensure compliance with the Universal Waste regulations (40 CFR 273). Specifically, ensure that all universal waste containers are labeled properly and that universal waste is not accumulated on-site for more than one year.
- 3) Ensure that all employees with hazardous waste management duties (including signing manifests and performing weekly inspections as well as transporting hazardous waste on-site) are properly and appropriately trained to perform their job (as it pertains to hazardous waste) safely and are able to respond to a hazardous waste emergency. Ensure that all employees with hazardous waste management duties have job descriptions that are inclusive of all hazardous waste management duties that they may perform.
- 4) Remember that all hazardous waste must be placed in containers and all spills must be cleaned up immediately.

Jenny Patterson

Date: 10-28-05

Jenny Patterson
Waste Management Specialist, NCDENR