

EPA ID Number: NCR000001750

710  
4/19/06

Facility Name: STACLEAN DIFFUSER Co.

City: EAST SPENCER, NC

EVALUATION DATA New:  Change:  Delete:

Mo. Day Yr. Type:  
Date: 02/08/06 C E I  
Date: 03/20/06 C S E

APR 25 2006

Inspector ID #: 046 Reason:

Evaluation Comments:

SOG COMPLIANCE INSPECTION. DOCKET # 2006-110

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)

- a SNC (SNY evaluation)

Docket #

or

- no longer a SNC (SNN eval.)

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

# 1 Type: GPT Date Determined 02/08/06 Class:

Priority:  Branch: 01 Person: 046

Return to Compliance 03/17/06 03/15/06  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 262.11

Comment:

# 2 Type: GPT Date Determined: 02/08/06 Class:

Priority:  Branch: 01 Person: 046

Return to Compliance: 03/17/06 03/15/06  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 262.34 (c)(1)(i) REFERENCED AT 40 CFR 265.173 (a)

Comment:

Priority: \_\_\_\_\_ Branch: 01 Person: 046

Return to Compliance: 03/17/06 03/15/06  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 262.34 (c)(1)(ii)

Comment: \_\_\_\_\_

# 4 Type: G S Q Date Determined: 02/08/06 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: 01 Person: 046

Return to Compliance: 03/17/06 03/15/06  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 262.34 (d)(4) REFERENCED AT  
40 CFR 265.32 (c)

Comment: \_\_\_\_\_

# 5 Type: G S Q Date Determined: 02/08/06 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: 01 Person: 046

Return to Compliance: 03/17/06 03/15/06  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 262.34 (d)(4) REFERENCED AT  
40 CFR 265.37 (a)

Comment: \_\_\_\_\_

# 6 Type: G S Q Date Determined: 02/08/06 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: 01 Person: 046

Return to Compliance: 03/17/06 03/15/06  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 262.34 (d)(5)(ii)

Comment: \_\_\_\_\_

# \_\_\_\_\_ Type: \_\_\_\_\_ Date Determined: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: \_\_\_\_\_ Person: \_\_\_\_\_

Return to Compliance: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
\*Scheduled\* \*Actual\*

Reg. Type: \_\_\_\_\_ Reg. Description: \_\_\_\_\_

Comment: \_\_\_\_\_

**NC DEPT OF ENVIRONMENT & NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION**

**RCRA RE-INSPECTION REPORT**

1. **Facility Information:** Staclean Diffuser Company  
601 South Long Street  
East Spencer, N.C. 28039  
**NCR 000 001 750, Small Quantity Generator**  
  
**Mailing:** PO Drawer 1147  
Salisbury, NC 28145-1147  
  
**Central Office:** 2205 Executive Drive  
Salisbury, NC 28039
2. **Facility Contact:** Mr. Charlie Patterson, Plant Manager  
704-636-8697
3. **Survey Participants:** Mr. Sean Morris, Waste Management Specialist
4. **Date of Re-Inspection:** March 20, 2006  
  
**Date of Report:** March 20, 2006
5. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279
6. **Facility Description:**

On February 8, 2006 I conducted an unannounced compliance inspection at Staclean Diffuser Company, located in East Spencer, NC. I met with Mr. Dan Woodrome and Mr. Charlie Patterson during the inspection. Staclean Diffuser Company operates as a small quantity generator of hazardous waste and is 57,000 square feet in size. The facility has been in operation at the current location since 1988 and has approximately 15-employees. The facility operates as a metal fabrication shop and manufactures metal diffusers for use in dust collectors. The facility also manufactures dust collection systems. Hazardous waste is generated in the diffuser cleaning operation and in the painting operation. The facility operates a 50-gallon mineral spirits washer for removing oils from diffusers. The mineral spirits is used until dirty and then is managed as hazardous waste. The facility generates approximately (20-55) gallons of hazardous waste on a monthly basis. Mr. Patterson stated that all waste lamps and waste solvent wipes are disposed as solid waste (see deficiency section). The facility contracts an outside painting company for most of the painting projects.

**7. Waste Type:**

- D001, waste petroleum distillates
- F005, D001, waste paint material

**8. Areas of Inspection:**

Manifests:

Hazardous waste manifests were reviewed for the past three years. All manifests documented approved transporters and TSD facilities. The manifests looked to be completed correctly. Land Disposal Restriction forms were available. Several manifests had to be faxed to the facility at the time of the inspection. A recommendation was made to keep a copy of all signed manifests onsite.

Transporters: Maumee Express, Inc – NJD 986 607 380  
Freehold Cartage, Inc – NJD 054 126 164

TSD's: Southeastern Chemical & Solvent – SCD 036 275 626

Weekly Inspections:

The facility conducts and documents weekly inspections at the hazardous waste storage area.

Training:

The facility conducts new employee training. Hazardous waste management is reviewed at that time.

Emergency Preparedness:

The facility is maintained to prevent fire or releases. The emergency coordinator is Charlie Patterson. The facility is equipped with fire extinguishers but was not equipped with spill control equipment (see deficiency section). All fire equipment is tested annually by an outside contractor and monthly by facility personnel. The facility is equipped with air horns for alarm signals. Arrangements with emergency agencies have not been made, a guidance document was provided to the facility at the time of the inspection (see deficiency section).

Contingency Plan:

The facility has not developed or posted the required contingency plan (see deficiency section).

### Accumulation Areas:

There were two satellite accumulation areas at the facility at the time of the inspection.

1. Diffuser Cleaning Area – There was (1) 55-gallon and (2) 5-gallon containers of waste mineral spirits at the accumulation area. The containers were properly closed but were not properly labeled at the time of the inspection (see deficiency section).
2. Big Building – There was (1) 55-gallon container of waste paint material at the accumulation area. The container was not properly closed or labeled at the time of the inspection (see deficiency section).

### Hazardous Waste Storage Areas:

There was one hazardous waste storage area at the facility.

1. Central Storage Area – There were (3) 55-gallon containers of hazardous waste liquids at this area. The containers were properly labeled and dated at the time of the inspection. The storage area is equipped with a fire extinguisher and Mr. Patterson stated that the “Buddy System” is used when moving containers. It was recommended that a two-way radio be placed in the storage area (see recommendation section). The storage area is labeled. All storage containers are located on a secondary containment pallet. It was recommended that the facility use larger “Hazardous Waste” labels on the storage containers (see recommendation section).

### Used Oil and Universal Waste:

Used oil is generated from general machinery maintenance and from the diffuser cleaning operation. Used oil is mixed with waste mineral spirits and handled as hazardous waste.

The facility generates waste fluorescent lamps and waste hi-intensity lamps. Facility personnel stated that all waste lamps are disposed as solid waste (see deficiency section). Waste lamps are placed in the roll off container located behind the facility.

## 9. Site Deficiencies:

- **40 CFR 262.11** - Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson stated that all waste lamps and waste solvent wipes are disposed as solid waste. Mr. Patterson could not provide any information or documentation to show that a waste determination has been conducted on waste lamps or solvent wipes generated at the facility. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that waste lamps will be managed as universal waste and that the waste solvent wipes will be managed as hazardous waste. Waste profile sheets were also provided.**
- **40 CFR 262.34 (c)(1)(i) referenced at 40 CFR 265.173 (a)** – Staclean Diffuser Company is in violation of this regulation in that the 55-gallon container of hazardous waste, located in the Big Building Area, was not properly closed at the time of the inspection. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that all hazardous waste containers will remain properly closed and each area will be inspected weekly.**
- **40 CFR 262.34 (c)(1)(ii)** – Staclean Diffuser Company is in violation of this regulation in that (1) 55-gallon container and (2) 5-gallon containers of hazardous waste, located in the Diffuser Cleaning Area, and (1) 55-gallon container of hazardous waste, located in the Big Building Area, were not properly labeled with the words “Hazardous Waste” or other words that described the contents of the containers. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that all hazardous waste accumulation containers have been properly labeled.**
- **40 CFR 262.34 (d)(4) referenced at 40 CFR 265.32 (c)** - Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson stated that the facility is not equipped with any type of spill control equipment. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that the facility has purchased a universal spill control kit.**
- **40 CFR 262.34 (d)(4) referenced at 40 CFR 265.37 (a)** – Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson did not have any knowledge or documentation to demonstrate that arrangements have been made with local emergency response agencies. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that arrangements have been made.**

- **40 CFR 262.34 (d)(5)(ii)** - Staclean Diffuser Company is in violation of this regulation in that the facility has not developed or posted a small quantity generator contingency plan. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that the required information has been posted next to phones at the facility. A copy of the contingency plan was included.**

#### **10. Recommendations:**

- It is recommended that a container be established for the collection of broken universal waste lamps and for waste batteries generated at the facility. All universal waste must be sent to a proper disposal facility.
- It is strongly recommended that a two-way radio be placed in the Central Storage Area. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that the "Buddy Systems" and two-way radios would be used at the Central Storage Area.**
- It is recommended that the facility use larger labels to identify hazardous waste containers in the Central Storage Area.
- It is recommended that the facility maintain all signed hazardous waste manifests onsite. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that copies of each hazardous waste manifest would be kept onsite.**
- It is strongly recommended that a lid be placed over the mineral spirits washing unit while in operation to eliminate the possibility of material from splashing out of the washer and onto the ground. **On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification stated that the lid for the washer would be used during the washing process.**

**11. Follow Up Actions:**

**On March 15, 2006 I received a written certification from Mr. Charlie Patterson with Staclean Diffuser Company. The certification addressed each violation and included supporting documentation of compliance for violations cited on Notice of Violation, Docket # 2006-110.**

 3/20/06  
INSPECTOR (DATE)

**SENT VIA US MAIL**  
**FACILITY CONTACT**

cc:  
MRO Files  
Jesse Wells, Western Area Compliance Supervisor  
Central Office File  
Charlie Patterson, Staclean Diffuser Company



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

WASTE MANAGEMENT DIVISION  
HAZARDOUS WASTE SECTION

NOTICE OF VIOLATION

To: Staclean Diffuser Company  
2205 Executive Drive  
Salisbury, NC 28039  
Attn: Kathryn Johnson

Docket #: 2006-110  
Date of Inspection: February 8, 2006  
Facility Type: SQG  
EPA ID#: NCR 000 001 750

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereo at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On February 8, 2006 Sean Morris, Waste Management Specialist, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that investigation, the following violations were noted:

Citation

Specifics

1. 40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107, states that a generator must determine if solid waste is a hazardous waste. This may be done by either testing the waste or by applying knowledge of the hazardous characteristic of the waste.

Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson stated that all waste lamps and waste solvent wipes are disposed as solid waste. Mr. Patterson could not provide any information or documentation to show that a waste determination has been conducted on waste lamps or solvent wipes generated at the facility.

2. **40 CFR 262.34 (c)(1)(i), adopted by reference at 15A NCAC 13A .0107, and referenced at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110,** states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Staclean Diffuser Company is in violation of this regulation in that the 55-gallon container of hazardous waste, located in the Big Building Area, was not properly closed at the time of the inspection.

3. **40 CFR 262.34 (c)(1)(ii), adopted by reference at 15A NCAC 13A .0107,** states that satellite containers must be labeled with the words "hazardous waste" or other words that identify the contents of the containers.

Staclean Diffuser Company is in violation of this regulation in that (1) 55-gallon container and (2) 5-gallon containers of hazardous waste, located in the Diffuser Cleaning Area, and (1) 55-gallon container of hazardous waste, located in the Big Building Area, were not properly labeled with the words "Hazardous Waste" or other words that described the contents of the containers.

4. **40 CFR 262.34 (d)(4), adopted by reference at 15A NCAC 13A .0107, and referenced at 40 CFR 265.32 (c), adopted by reference at 15A NCAC 13A .0110,** states that all facilities must be equipped with portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson stated that the facility is not equipped with any type of spill control equipment.

5. **40 CFR 262.34 (d) (4), adopted by reference at 15A NCAC 13A .0107, and referenced at 40 CFR 265.37 (a) adopted by reference at 15A NCAC 13A .0110,** states that arrangements must be made with all local authorities for the potential need for services.

Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson did not have any knowledge or documentation to demonstrate that arrangements have been made with local emergency response agencies.

6. **40 CFR 262.34 (d)(5)(ii), adopted by reference at 15A NCAC 13A .0107,** states that a generator must post the following information next to the telephone:

- (A) The names and telephone number of the emergency coordinator.
- (B) Location of fire extinguishers and spill control material and, if present, fire alarms.
- (C) The telephone of the fire department unless the facility has a direct alarm.

Staclean Diffuser Company is in violation of this regulation in that the facility has not developed or posted a small quantity generator contingency plan.

You are hereby required to comply with the noted violations by March 17, 2006 at which time a follow up visit will be performed. If compliance with the violations noted above are not met, pursuant to N.C.G.S. 130A-22 (a) and 15A NCAC 13A .0701-.0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

In further satisfaction of Docket #2006-110, Staclean Diffuser Company shall provide a written certification with supporting documentation on company letterhead confirming the noted compliance schedule has been completed. Mail this certification to Mr. Sean Morris - Waste Management Specialist at NCDENR-Division of Waste Management, Hazardous Waste Section, 610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115.

FEB. 13 2006  
(Date)

  
N.C. Hazardous Waste Section

I, J. Sean Morris, hereby certify that I have personally served a copy of this Notice on:  
Ms. Kathryn Johnson at Staclean Diffuser Company by certified mail.

SENT CERTIFIED MAIL  
(Recipient Signature)

Cc: Mr. Jesse Wells, NC Hazardous Waste Section  
Central Files  
MRO files

COPY

**NC DEPT OF ENVIRONMENT & NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION**

**RCRA INSPECTION REPORT**

1. **Facility Information:** Staclean Diffuser Company  
601 South Long Street  
East Spencer, N.C. 28039  
**NCR 000 001 750, Small Quantity Generator**

Mailing: PO Drawer 1147  
Salisbury, NC 28145-1147

Central Office: 2205 Executive Drive  
Salisbury, NC 28039

2. **Facility Contact:** Ms. Kathryn Johnson  
Mr. Charlie Patterson, Plant Manager  
704-636-8697
3. **Survey Participants:** Mr. Dan Woodrome, Project Coordinator  
Mr. Charlie Patterson, Plant Manager  
Mr. Sean Morris, Waste Management Specialist
4. **Date of Inspection:** February 8, 2006
- Date of Report:** February 13, 2006
5. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279

6. **Facility Description:**

On February 8, 2006 I conducted an unannounced compliance inspection at Staclean Diffuser Company, located in East Spencer, NC. I met with Mr. Dan Woodrome and Mr. Charlie Patterson during the inspection. Staclean Diffuser Company operates as a small quantity generator of hazardous waste and is 57,000 square feet in size. The facility has been in operation at the current location since 1988 and has approximately 15-employees. The facility operates as a metal fabrication shop and manufactures metal diffusers for use in dust collectors. The facility also manufactures dust collection systems. Hazardous waste is generated in the diffuser cleaning operation and in the painting operation. The facility operates a 50-gallon mineral spirits washer for removing oils from diffusers. The mineral spirits is used until dirty and then is managed as hazardous waste. The facility generates approximately (20-55) gallons of hazardous waste on a monthly basis. Mr. Patterson stated that all waste lamps and waste solvent wipes are disposed as solid waste (see deficiency section). The facility contracts an outside painting company for most of the painting projects.

7. Waste Type:

- D001, waste petroleum distillates
- F005, D001, waste paint material

8. Areas of Inspection:

Manifests:

Hazardous waste manifests were reviewed for the past three years. All manifests documented approved transporters and TSD facilities. The manifests looked to be completed correctly. Land Disposal Restriction forms were available. Several manifests had to be faxed to the facility at the time of the inspection. A recommendation was made to keep a copy of all signed manifests onsite.

Transporters: Maumee Express, Inc – NJD 986 607 380  
Freehold Cartage, Inc – NJD 054 126 164

TSD's: Southeastern Chemical & Solvent – SCD 036 275 626

Weekly Inspections:

The facility conducts and documents weekly inspections at the hazardous waste storage area.

Training:

The facility conducts new employee training. Hazardous waste management is reviewed at that time.

Emergency Preparedness:

The facility is maintained to prevent fire or releases. The emergency coordinator is Charlie Patterson. The facility is equipped with fire extinguishers but was not equipped with spill control equipment (see deficiency section). All fire equipment is tested annually by an outside contractor and monthly by facility personnel. The facility is equipped with air horns for alarm signals. Arrangements with emergency agencies have not been made, a guidance document was provided to the facility at the time of the inspection (see deficiency section).

Contingency Plan:

The facility has not developed or posted the required contingency plan (see deficiency section).

### Accumulation Areas:

There were two satellite accumulation areas at the facility at the time of the inspection.

1. *Diffuser Cleaning Area* – There was (1) 55-gallon and (2) 5-gallon containers of waste mineral spirits at the accumulation area. The containers were properly closed but were not properly labeled at the time of the inspection (see deficiency section).
2. *Big Building* – There was (1) 55-gallon container of waste paint material at the accumulation area. The container was not properly closed or labeled at the time of the inspection (see deficiency section).

### Hazardous Waste Storage Areas:

There was one hazardous waste storage area at the facility.

1. *Central Storage Area* – There were (3) 55-gallon containers of hazardous waste liquids at this area. The containers were properly labeled and dated at the time of the inspection. The storage area is equipped with a fire extinguisher and Mr. Patterson stated that the “Buddy System” is used when moving containers. It was recommended that a two-way radio be placed in the storage area (see recommendation section). The storage area is labeled. All storage containers are located on a secondary containment pallet. It was recommended that the facility use larger “Hazardous Waste” labels on the storage containers (see recommendation section).

### Used Oil and Universal Waste:

Used oil is generated from general machinery maintenance and from the diffuser cleaning operation. Used oil is mixed with waste mineral spirits and handled as hazardous waste.

The facility generates waste fluorescent lamps and waste hi-intensity lamps. Facility personnel stated that all waste lamps are disposed as solid waste (see deficiency section). Waste lamps are placed in the roll off container located behind the facility.

### **9. Site Deficiencies:**

- **40 CFR 262.11** - Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson stated that all waste lamps and waste solvent wipes are disposed as solid waste. Mr. Patterson could not provide any information or documentation to show that a waste determination has been conducted on waste lamps or solvent wipes generated at the facility.

- **40 CFR 262.34 (c)(1)(i) referenced at 40 CFR 265.173 (a)** – Staclean Diffuser Company is in violation of this regulation in that the 55-gallon container of hazardous waste, located in the Big Building Area, was not properly closed at the time of the inspection.
- **40 CFR 262.34 (c)(1)(ii)** – Staclean Diffuser Company is in violation of this regulation in that (1) 55-gallon container and (2) 5-gallon containers of hazardous waste, located in the Diffuser Cleaning Area, and (1) 55-gallon container of hazardous waste, located in the Big Building Area, were not properly labeled with the words “Hazardous Waste” or other words that described the contents of the containers.
- **40 CFR 262.34 (d)(4) referenced at 40 CFR 265.32 (c)** - Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson stated that the facility is not equipped with any type of spill control equipment.
- **40 CFR 262.34 (d)(4) referenced at 40 CFR 265.37 (a)** – Staclean Diffuser Company is in violation of this regulation in that Mr. Patterson did not have any knowledge or documentation to demonstrate that arrangements have been made with local emergency response agencies.
- **40 CFR 262.34 (d)(5)(ii)** - Staclean Diffuser Company is in violation of this regulation in that the facility has not developed or posted a small quantity generator contingency plan.

**10. Recommendations:**

- It is recommended that a container be established for the collection of broken universal waste lamps and for waste batteries generated at the facility. All universal waste must be sent to a proper disposal facility.
- It is strongly recommended that a two-way radio be placed in the Central Storage Area.
- It is recommended that the facility use larger labels to identify hazardous waste containers in the Central Storage Area.
- It is recommended that the facility maintain all signed hazardous waste manifests onsite.
- It is strongly recommended that a lid be placed over the mineral spirits washing unit while in operation to eliminate the possibility of material from splashing out of the washer and onto the ground.

 2/13/06  
INSPECTOR (DATE)

SENT VIA CERTIFIED MAIL  
FACILITY CONTACT

cc:  
MRO Files  
Jesse Wells, Western Area Compliance Supervisor  
Central Office Files  
Kathryn Johnson, Staclean Diffuser Company

# Staclean Diffuser Company

2205 Executive Drive  
Salisbury, NC 28147  
800-438-3850 Fax: 704-636-2792  
[sales@staclean.com](mailto:sales@staclean.com) [www.staclean.com](http://www.staclean.com)



March 8, 2006

Mr. Sean Morris – Waste Management Specialist  
NCDENR – Division of Waste Management  
Hazardous Waste Section  
610 East Center Avenue, Suite 301  
Mooresville, NC 28115

Subject: Docket #2006-110 (completion of compliance schedule)

Dear Mr. Morris:

In response to your Notice of Violation letter, dated February 13, 2006, we are providing the required "written certification with supporting documentation" confirming that the noted compliance schedule has been completed. We have addressed the six violations as follows:

## Citation

## Specifics

1. **40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107**, states that a generator must determine if solid waste is a hazardous waste.

We have contacted Giant Resource Recovery (OMNI) to establish Waste Profiles for our waste lamps (4' and 8' fluorescent lamps, Metal Halide Bulbs), waste solvent wipes, and batteries (A, C, D, 9-Volt, etc). I have attached copies of the Facility Profile Forms that have been faxed to Giant Resource Recovery so these items can be disposed of as Hazardous Waste. (SEE ATTACHMENT #1) I am also enclosing photos of the containers to be used for storing the used lamps and batteries. (SEE ATTACHMENT #2) Giant Resource Recovery will be delivering to us (week of 3/13/06) a 30 gallon drum approved for Hazardous Waste, with removable lid and ring for storage of the waste rags. As of 3/8/06, we have no waste lamps or rags, but once we do, the appropriate container(s) will be marked with the accumulation start date.

2. **40 CFR 262.34 (c)(1)(i), adopted by reference at 15A NCAC 13A .0107, and referenced at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110**, states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Citation

Specifics

We have discussed with those employees involved with filling and movement of the hazardous waste drums the need to keep the drums closed at all times, except while adding waste to the drum(s). In addition to this, we have revised the Weekly Hazardous Waste Container Inspection Log to include, not only drums in the waste storage area, but also the satellite accumulation areas for the waste mineral spirits, waste paint, and Xylene rag drums. By incorporating this into our weekly inspection process, we can ensure that all drums are kept closed, thus being in a position to promptly correct any deficiencies. I have attached a copy of the old, as well as the revised inspection logs for your review.  
(SEE ATTACHMENT #3)

3. **40 CFR 262.34 (c)(1)(ii), adopted by reference at 15A NCAC 13A .0107**, states that satellite containers must be labeled with the words "hazardous waste" or other words that identify the contents of the containers.

To correct this violation, we have placed the yellow "Hazardous Waste" labels provided us by Giant Resource Recovery on the 55 gallon drums at the satellite accumulation areas (Diffuser Cleaning Area; Big Building Area). The accumulation start date will not be placed on these labels until they are moved to the Hazardous Waste Storage Area. In addition to this, we have revised the Weekly Hazardous Waste Container Inspection Log to include, not only drums in the waste storage area, but also the satellite accumulation areas for the waste mineral spirits, waste paint, and Xylene rag drums. By incorporating this into our weekly inspection process, we can make sure that all drums are properly labeled, thus being in a position to promptly correct any deficiencies. As mentioned previously, I have attached a copy of the old, as well as the revised Inspection Log for your review. (SEE ATTACHMENT #3) I have also enclosed photos of these two satellite accumulation drums, showing the Hazardous Waste labels that are now on each drum. (SEE ATTACHMENT #4) In viewing these photos, you will also notice that we have fabricated containment stands for the two satellite accumulation drums in the Diffuser cleaning area, and in the Big Building area. This will assure that if the drums start to leak, or material is spilled when filling the drums, the hazardous material will be confined in the containment stand itself until it is drained into proper containers.

As for the two unmarked 5-gallon containers used for draining the dirty mineral spirits from the Diffuser bath, these have been replaced with two 2.5 gallon Mineral Spirit containers, and have been marked accordingly. I have included pictures of these new mineral spirit containers as well.

Citation

Specifics

4. **40 CFR 262.34 (d)(4), adopted by reference at 15A NCAC 13A .0107, and referenced at 40 CFR 265.32 (c), adopted by reference at 15A NCAC 13A .0110, states that all facilities must be equipped with . . . spill control equipment.**

To correct this violation, per our conversation with you during the plant inspection, Staclean has purchased a universal spill control kit. This kit consists of the following: (40) 17" x 19" Sonic Bonded Pads; (6) 8' Gray Universal Socks; (10) 4' Gray Universal Socks; (6) 18" x 18" Universal Pillows; (2) Pairs of Nitril Gloves; (6) Individual Clear Disposal Bags; and (1) 65 Gallon Overpack. This spill kit has been placed on a pallet, along with two 50 lb bags of floor dry. The Spill Control Kit Station has been located in a centralized location, thus enabling quick access should there be a spill in the Diffuser Bath area, or when transporting a satellite accumulation drum to the Hazardous Waste Storage area. I have included photos showing this spill control kit. (SEE ATTACHMENT #5)

5. **40 CFR 262.34 (d)(4), adopted by reference at 15A NCAC 13A .0107, and referenced at 40 CFR 265.37 (a), adopted by reference at 15A NCAC 13A .0110, states that arrangements must be made with all local authorities for the potential need for services.**

While Mr. Patterson did not have documentation to show that Staclean had made arrangements with the local emergency response agencies, we have in times past supplied the local fire department here in East Spencer with copies of our MSDS sheets. Also the local fire department toured our facility on a Saturday back in October/November of '05. A few weeks back, I received what I took to be a follow up letter from the Deputy Fire Chief requesting additional information about our facility. As a result of your inspection, and this letter from the fire department, I have provided them with the following: Emergency Contact Number; Key Holder Numbers, along with E.T.A.; current M.S.D.S. sheets; Emergency Evacuation Drawings; and a copy of Staclean's Emergency Action Plan. I am providing you with a copy of the letter and items provided to Skipper Davis, Deputy Fire Chief, on March 2, 2006. (SEE ATTACHMENT #6) However, I am not including copies of our M.S.D.S. sheets. If you would like, I would be happy to review these with you during your follow-up visit on March 17, 2006.

Citation

Specifics

6. **40 CFR 262.34 (d)(5)(ii), adopted by reference at 15A NCAC 13A .0107,** states that a small quantity generator must post . . . next to the phone:

- (A) The names and telephone number of the emergency coordinator.
- (B) Location of fire extinguishers and spill control material, and if present, fire alarms.
- (C) The telephone number of the fire department unless the facility has a direct alarm.

To be in compliance with the posted contingency plan as a small quantity generator, we have adjusted our posted "Emergency Evacuation" drawings, which already included the location of all fire extinguishers, to include the following items:

- (A) The name and telephone numbers of our emergency coordinator.
- (B) The location of our spill control station.
- (C) The telephone number of the local fire and police departments.
- (D) The location of our satellite accumulation areas.

All "Emergency Evacuation" drawings posted throughout the plant have been replaced with this new drawing. In addition to this, a copy of the revised drawing has been posted next to the telephone in the Plant Supervisor's office, as well as the downstairs office. The "Emergency Contact Phone Numbers" have also been posted next to all telephones in the upstairs offices as well. I have included a copy of the revised drawings that are posted throughout the plant, as well as a photo of the drawing posted next to the supervisor's phone. (SEE ATTACHMENT #7)

It is hoped that the actions listed above, in response to the violations that were listed during your inspection of our plant on February 8, 2006, are a clear indication of our desire to be in compliance with all state and federal regulations as a small quantity generator.

In addition to the above, we would also like to address the following items that you brought to our attention during your inspection:

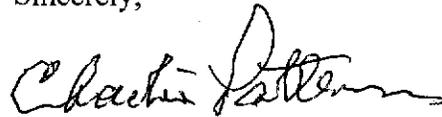
- (1) In the past, all signed copies of the hazardous waste manifests have been kept at our main office. Following your recommendation, I have obtained copies of the signed manifests back to the beginning of 2002. I have also instructed the main office personnel to send copies of the signed manifests to the plant upon receipt from Giant Resource Recovery (OMNI).

March 8, 2006

- (2) Concerning the movement of containers to the hazardous waste storage area, in addition to using the "Buddy System", we have also instituted a plan that requires the two employees to carry a two-way radio with them when transferring containers to the storage area. This will enable them to contact supervisory personnel in case an emergency situation arises while in the hazardous waste storage area.
- (3) In following your recommendation concerning a lid being placed over the mineral spirits washing unit while it is in operation, the employees working in that area have been instructed to place the existing lids on the unit during its operation.

We hope that the steps we have taken in correcting the stated deficiencies will meet with your approval, and will result in Staclean's being in compliance with the regulations placed upon us by state and federal authorities. We are open to any other recommendations you might have that will help us not only to remain in compliance, but also to help Staclean keep our employees and the surrounding community safe.

Sincerely,



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Charlie Patterson  
Plant Manager, Staclean Diffuser Company