

Hazardous Waste Compliance Data Entry Form - Side A

AW
3/6/06

EPA ID Number: NCR000002006

Facility Name: IRA GRIFFIN SONS, INC. City: CHARLOTTE

EVALUATION DATA New: ~~S~~ Change: Delete:

Date: 12/14/05 CAV
Date: 2/7/06 CSE

COPY

Inspector ID #: 044 Reason: _____

Evaluation Comments:

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: GSO Date Determined: 12/14/05 Class: _____

Priority: _____ Branch: 01 Person: 044

Return to Compliance: 01/20/06
Scheduled

02/07/06
Actual

Reg. Type: SR Reg. Description: 262.11

public

Comment: no waste analysis/determination for paint booth filters

2 Type: GSO Date Determined: 12/14/05 Class: _____

Priority: _____ Branch: 01 Person: 044

Return to Compliance: 01/20/06
Scheduled

02/07/06
Actual

Reg. Type: SR Reg. Description: 262.34(d)(4) ref. 262.34(a)(2)

Comment: Hazardous waste containers not dated

ok

3 Type: GSO

Date Determined: 12/14/05

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 01/20/06
Scheduled

02/07/06
Actual

Reg. Type:

Reg. Description: 262.34(d)(4) ref 262.34(a)(3)

Comment: Hazardous waste containers not labeled

ok

4 Type: GSO

Date Determined: 12/14/05

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 01/20/06
Scheduled

02/07/06
Actual

Reg. Type:

Reg. Description: 262.34(d)(5)(ii)

Comment: No contingency plan posted

not required

5 Type: GSO

Date Determined: 02/14/05

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 01/20/06
Scheduled

02/07/06
Actual

Reg. Type:

Reg. Description: 262.34(d)(5)(iv)(B)

Comment: Spill in the HW storage area on the floor.

ok
cleaned up

6 Type: GSO

Date Determined: 02/14/05

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 01/20/06
Scheduled

02/07/06
Actual

Reg. Type: SR

Reg. Description: 265.37

Comment: No emergency arrangements made

not required

7 Type: GSO

Date Determined: 12/14/05

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 01/20/06
Scheduled

02/07/06
Actual

Reg. Type: SR

Reg. Description: 265.174

Comment: No weekly inspections conducted

not required

Small Quantity Generator Re-Inspection Report

NCDENR-Division of Waste Management Hazardous Waste Section

February 8, 2006

Facility Name: Ira Griffin Sons, Inc.

Location: 2205 N. Tryon Street, Charlotte, NC 28206 (PO Box 34185, Char, NC 28234)

EPA ID#: NCR 000 002 006

Contact/ Title: Vic French/ Production Manager

Inspection Date: December 14, 2005

Re-Inspection Date: February 7, 2006

Last Inspection: None

Status: SQG

Type of Inspection: CSE

Inspector: Mark Burnette, WMS

Present at Inspection: Vic French, Mark Burnette

Type of Business: Ira Griffin Sons, Inc. (Griffin) is an assembler/manufacturer of new textile machinery. Their waste is generated from their paint booth operation, along with waste oils and waste coolant. **(Re-inspection notes made in bold)**

Areas of Inspection

Manifests:

During the inspection, Mr. French was unable to locate the previous manifests. He has been in his position as production manager for approximately five months, and has not sent a shipment of hazardous waste off in that time. He was told that the manifests needed to be available for the follow-up inspection in January. The facility stated they currently use Shamrock Environmental for their waste disposal.

During the re-inspection, it was discovered that the facility has been operating as a CESQG. They had manifest from 2002 until 2006. There were three shipments during that time which equaled 660 gallons (~5280 lbs). This puts them under the SQG limit, since their waste is not generated during a one time clean-out, but rather over time. The manifests available had approved transporters; TSDP's and attached LDR Forms.

Waste Generated:

Waste Flammable Liquid	D001	220 gal	6/20/02
		165 gal	10/4/04
		275 gal	1/9/06

Transporter:	Hazmat Transportation	NCR 000 003 186
	C-Mac Environmental Group	ALD 981 020 894

TSDF:	Giant Resource Recovery	SCD 036 275 626
	C-Mac Environmental Group	ALD 981 020 894

Inspection Records: No weekly inspections have been conducted. Any container holding hazardous waste and stored in the hazardous waste storage area must be inspected weekly. An example of a weekly inspection checklist was left on-site for the facility to use.

Weekly inspection records are not required for CESQG's.

Contingency Plan: The facility currently does not have a contingency plan posted. An example of a SQG contingency plan was left on-site. All SQG's are required to post this plan in the facility near a telephone. The plan must include the emergency coordinator address (home) and phone numbers (home/office), the location of emergency equipment (fire extinguishers, spill control equipment, alarms), and the phone number the fire department.

The facility has evacuation maps posted, but does not have a contingency plan posted. It is not required of a CESQG to post a contingency plan, but Mr. French mentioned that they were planning on doing so.

Emergency Arrangements: The facility has not made arrangements in writing with local responders such as Fire, Police and hospital. The facility was given an example of an emergency arrangement letter to send to their local responders. It is a good idea to send these certified for your records. Their emergency equipment such as fire extinguishers is tested annually. The facility has an internal paging system, fire extinguishers, spill absorbent, and a sprinkler system.

Emergency arrangements are not required for CESQG's.

Training Records: The facility performs training in-house for their hazardous waste handlers. It is always a good idea to document training events with a sign in sheet signed by the instructor. A description of the type of training received is also a good idea to keep.

Satellite Accumulation Area: None.

Storage Area: Griffin maintains a hazardous waste storage area outside their building on the loading dock. During the inspection, there were four 55-gallon containers in the area. None of the containers were labeled or dated. Also, one of the containers was not closed properly because it was missing a small bung in the top opening. Also, there was no designation for the area as Hazardous Waste storage.

During the re-inspection, the hazardous waste storage area was in good order. There were no evidences of spills, and the hazardous waste containers were properly closed, labeled, and dated.

Site Deficiencies:

40 CFR 262.11- A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

- (a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.
- (b) He must then determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261.

Note: Even if the waste is listed, the generator still has an opportunity under 40 CFR 260.22 to demonstrate to the Administrator that the waste from his particular facility or operation is not a hazardous waste.

(c) For purposes of compliance with 40 CFR part 268, or if the waste is not listed in subpart D of 40 CFR part 261, the generator must then determine whether the waste is identified in subpart C of 40 CFR part 261 by either:

- (1) Testing the waste according to the methods set forth in subpart C of 40 CFR part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
- (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.
- (d) If the waste is determined to be hazardous, the generator must refer to parts 261, 264, 265, 266, 268, and 273 of this chapter for possible exclusions or restrictions pertaining to management of the specific waste.

During the inspection a waste analysis for the paint booth filters was not available.

The waste analysis is being conducted for the paint booth filters, and depending on the results, the filters will be properly managed.

40 CFR 262.34(d)(4) ref. 262.34(a)(2)- The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

During the inspection, the four (4) containers in the hazardous waste storage area were not dated.

All hazardous waste containers in storage were properly dated during the re-inspection.

40 CFR 262.34(d)(4) ref. 262.34(a)(3)- While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste"

During the inspection, the four (4) hazardous waste containers were not labeled with the words "Hazardous Waste".

All hazardous waste containers were properly labeled during the re-inspection.

40 CFR 262.34(d)(5)(ii)- The generator must post the contingency plan next to the telephone.

During the inspection, there was no contingency plan posted next to the telephones.

Not required of a CESQG.

40 CFR 262.34(d)(5)(iv)(B)-In the event of a spill, contain the flow of hazardous waste to the extent possible, and as soon as is practicable, clean up the hazardous waste and any contaminated materials or soil;

During the inspection, there was evidence of a spill in the <180-day hazardous waste storage area. There was paint-related material on the concrete around the bottom of one of the hazardous waste containers.

During the re-inspection, all evidences of spills had been cleaned up and containerized.

40 CFR 265.37- (a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses, which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

During the inspection, evidence of arrangements with local responders was not available.

Emergency arrangements are not required of CESQG's.

40 CFR 265.174- The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

During the inspection, there were no records of weekly inspections ever being conducted for the hazardous waste storage area.

Weekly inspections are not required of CESQG's.

Recommendations:

- Create a hazardous waste binder to keep all of you manifests and associated hazardous waste paperwork in a central location. Keep manifests, training records, contingency plans, emergency arrangements, weekly inspections and any other hazardous waste related material in this location.

MaBentley 2/9/06

Inspector (Date)

_____ by mail _____

Facility Contact (Date)