

Hazardous Waste Compliance Date Entry Form

Not dated
ibca
9a
3/2/05

EPA ID Number NCR000003475

Facility Name Interflex

City: Wilkesboro

EVALUATION DATA New: **X** Change: Date: 3/1/2005

	Mo. Day Yr.	Type:
Date:	<u>1/5/2005</u>	CEI
Date:	<u>2/24/05</u>	<u>CSE</u>

Inspector ID # 043 Reason:

Evaluation Comments

CAV - No violations

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 #

- no longer a SNC (SNN eval.)

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

0 Type: Date Determined 1/5/2005 Class::

Priority: Branch: Person::

Return to Compliance: 2/18/2005
Scheduled *Actual*

MAR 21 2005

Reg.Type SR Reg.Description

Comments: CAV - No violations

Re-inspection:



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr.,

RCRA RE-INSPECTION REPORT

Certified Mail - Return Receipt Requested

Facility Information

The Interflex Group, Inc.
3200 Highway 268 West
Wilkesboro, NC 28697

Facility Contact – Paul Douglas
336-921-3505

EPA ID Number – NCR000003475

Inspector (s) -- Ernest Lawrence

Date of Inspection – January 5, 2005

Date of Re-inspection – February 24, 2005

Status - LQG

Inspection Type – CAV (CSE on re-inspection)

Present at Inspection – Paul Douglas, Ernest Lawrence

Facility Description

The Interflex Group, Inc. is a flexographic printing facility for food packaging industries. It uses solvent-based inks and generates D001 waste (off-spec and spent ink).

Wastes Generated

D001 – Waste combustible liquid (ethanol, N-propyl acetate).

D001/D039 – Waste combustible liquid (petroleum naphtha)

Satellite Accumulation Areas – There was one satellite accumulation area.

Ink Room Satellite Area – There was one 55-gallon container of D001 waste at the time of inspection and re-inspection. The container was closed and labeled. There were no releases.

Storage Area – Solvent Distillation Unit – The facility has one hazardous waste storage area that is just outside ink room. There was no waste in storage at the time of inspection. There were two 55-gallon containers dated 2/22/05 at the time of re-inspection.

Containers on site for less than 90 days? – NA

Containers compatible with waste? – NA.

585 Waughtown Street, Winston-Salem, NC 27107-2241

Phone: 336-771-4600 \ FAX: 336-771-4631

One
North Carolina
Natural

Managing incompatible waste? -- NA
Aisle space adequate? -- NA
Containers closed and labeled "Hazardous Waste"? - NA
Evidence of release? -- No
Type of device in area to summon outside help? -- Yes

Manifests

The facility's manifests were reviewed for 2002-2004. All manifests appeared to be filled out properly and copies maintained on site as required.

Filled Out Correctly - Yes

Signed Copies -- Yes. The date of the final signatures on manifests #81066 and #88090 were not legible. These copies had been received by fax.

LDR Notification Attached - Yes

Transporters - Univar USA -- GAD980845077

Nuway Industry Services -- SCD987598331

Maumee Express -- NJD 986607380

Safety Kleen Systems -- TXR000050930

TSDF's- Southeastern Chemical and Solvent -- SCD036275626

Safety Kleen Systems -- SCD077995488

Inspection Records

Weekly Inspections - Inspections of hazardous waste containers in storage were conducted weekly. Two weekly inspections were missed.

Contingency Plan

On site - Yes

Any changes of facility/processes or Emergency Coordinator since last review -- No

Contingency plan implemented - No

Agreement with Emergency Responders -- Copies were submitted to the fire department, hospital, and police. A copy had not been submitted to an emergency response teams and no agreement had been made. *A copy was submitted by the time of re-inspection.*

Emergency Coordinators Address -- The required information was provided.

Location of Spill Control Equipment -- The spill control equipment is described in the plan.

Evacuation Plan -- The facility has an evacuation plan.

Training Records and Job Descriptions

Job descriptions with hazardous waste duties adequate? -- The facility had one hazardous waste management job description that applied to three job titles. A separate job description must be available for each job title. Job titles and job descriptions were not available for five employees in the maintenance shop who sign manifests for parts cleaner waste. *By the time of re-inspection maintenance employees stopped signing manifests and had no other hazardous waste management responsibilities. Job descriptions were available for all employees who do manage hazardous waste.*

Training records available? -- Five employees in the maintenance shop who sign manifests for parts cleaner waste did not receive hazardous waste training. Also, the most recent training date of November 23, 2004 was 14 months after the previous date of September 15, 2003. *By the time of re-inspection maintenance employees stopped signing manifests and had no other hazardous waste management responsibilities. All employees that manage hazardous waste were trained by the time of re-inspection.*

Evidence of improper/inadequate training? - Training was adequate.

Biennial Report Submitted? - Yes.

Emergency Preparedness

Facility maintained and operated to prevent releases? -Yes.

Adequate Aisle Space? – Yes

Other HW Units - N/A

Universal Waste – There was one box being used to collect fluorescent tubes. It was open, unlabeled, and there was no starting accumulation date or other inventory system to track storage and accumulation. *At the time of re-inspection there were two containers of used fluorescent tubes that were closed, labeled and marked with a starting accumulation date.*

Used Oil – Two 55-gallon containers of used oil were observed. They were labeled “Used Oil” and no releases were observed.

Site Deficiencies

1. 40 CFR 262.20 reference 262 Appendix Item 20 – A manifest must be prepared in accordance with instructions in the appendix, including providing the date of the final signature. The date of the final signatures on manifests #81066 and #88090 were not legible. These copies had been received by fax.

IN COMPLIANCE – At the time of re-inspection all manifests were signed and properly filled out.

2. 40 CFR 262.34(a)(1)(i) reference 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. Two weekly inspections of the 90-day storage area were not conducted.

IN COMPLIANCE – The facility stated in correspondence that weekly inspections are being made each Wednesday.

3. 40 CFR 262.34(a)(4) reference 265.16(a)(1) - Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance. Five employees in the maintenance shop who sign manifests for parts cleaner waste did not receive hazardous waste training.

IN COMPLIANCE – By the time of re-inspection maintenance employees stopped signing manifests and had no other hazardous waste management responsibilities. All employees that manage hazardous waste were trained by the time of re-inspection.

4. 40 CFR 262.34(a)(4) reference 265.16(c) - Facility personnel must take part in an annual review of their initial training. The most recent training date of November 23, 2004 was 14 months after the previous date of September 15, 2003.

IN COMPLIANCE – The facility stated in February 7,2005 correspondence that all personnel that manage hazardous waste will be trained before November 23, 2005.

5. 40 CFR 262.34(a)(4) reference 265.16(d)(2) - The owner or operator of a facility that handles hazardous waste must maintain at the facility a written job description for each position related to hazardous waste management. Job titles and job descriptions were not available for five employees in the maintenance shop who sign manifests for parts cleaner waste. Also, a separate job description must be available for each job title.

IN COMPLIANCE - By the time of re-inspection maintenance employees stopped signing manifests and had no other hazardous waste management responsibilities. All employees that manage hazardous waste had job titles and job descriptions available.

6. 40 CFR 262.34(a)(4) reference 265.37(a)(3) – The owner or operator must attempt to make emergency arrangements with emergency response teams that might be called upon to respond. The facility did not attempt to make arrangements with the emergency response team that the facility plans to call in the event of an emergency.

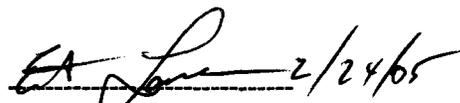
IN COMPLIANCE - The facility stated in February 7,2005 correspondence that arrangements were made with an emergency response team on February 7.

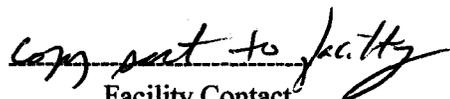
7. 40 CFR 262.34(a)(4) reference 265.53(b) - A copy of the contingency plan and all revisions must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. A copy had not been submitted to an emergency response teams and no agreement had been made.

The facility stated in February 7,2005 correspondence that a copy of the contingency plan had been submitted to an emergency response team on February 7.

8. 40 CFR 273.13(d), 273.14(c), and 273.15(c) - each fluorescent lamp or the container or package in which lamps are contained must be closed and labeled or marked clearly with one of the following phrases: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." Generators must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. One box of used fluorescent tubes was open, unlabeled, and there was no starting accumulation date or other inventory system to track storage and accumulation.

IN COMPLIANCE - At the time of re-inspection there were two containers of used fluorescent tubes that were closed, labeled and marked with a starting accumulation date.


RCRA Inspector Date


Facility Contact