

EPA ID Number: NCR00008284

Facility Name: COMMSCOPE City: STATESVILLE, NC

EVALUATION DATA New:  Change:  Delete:

Mo. Day Yr. Type:  
Date: 05/24/05 CAV  
Date: 07/14/05 ~~CSE~~ CFI

Inspector ID #: 046 Reason:           

Evaluation Comments:  
SQG COMPLIANCE ASSISTANCE INSPECTION.

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 05/24/05 Class:           

Priority:            Branch: 01 Person: 046

Return to Compliance 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

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

Comment:           

# 2 Type: GPT Date Determined: 05/24/05 Class:           

Priority:            Branch: 01 Person: 046

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

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

Comment:

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

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

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

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

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# 4 Type: GSQ Date Determined: 05/24/05 Class: \_\_\_\_\_

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

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 262.34 (d)(2) REFERENCED AT  
40 CFR 265.174

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

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# 5 Type: GSQ Date Determined: 05/24/05 Class: \_\_\_\_\_

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

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

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

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

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# 6 Type: GSQ Date Determined: 05/24/05 Class: \_\_\_\_\_

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

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

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

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

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# 7 Type: ~~GSQ~~  
GPT Date Determined: 05/24/05 Class: \_\_\_\_\_

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

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 273.13 (d)(1)

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

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

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 273.14 (c)(4)

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

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# 9 Type: GPT Date Determined: 05/24/05 Class: \_\_\_\_\_

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

Return to Compliance: 06/29/05 07/14/05  
\*Scheduled\* \*Actual\*

Reg. Type: SR Reg. Description: 40 CFR 279.22 (c)(1)

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

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

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

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

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

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

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

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

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

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

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

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# \_\_\_\_\_ 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:** CommScope  
125 CommScope Way  
Statesville, N.C. 28625  
**NCR 000 082 284, Small Quantity Generator**
2. **Facility Contact:** Mr. George Crosby, EH&S Manager  
704-832-7587
3. **Survey Participants:** Mr. George Crosby  
Mr. Sean Morris, Waste Management Specialist
4. **Date of Re-Inspection:** July 14, 2005  
  
**Date of Report:** July 15, 2005
5. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279
6. **Facility Description:**

On May 24, 2005 I conducted a compliance assistance inspection at CommScope located in Statesville, NC. I met with Mr. George Crosby who is the facility's EH&S Manager. The NC Hazardous Waste Section has not previously inspected the facility. The facility has been listed as a SQG for several years. The facility notified as a LQG on 3/31/05 and then back to a SQG on 4/14/05. The facility currently has around 200 employees and is around 330,000 square feet in size.

The facility conducts three different manufacturing processes at the plant. The first is plastic extrusion for the production of plastic coverings for different types of cables. Second, is bi-metal production which is the process of covering aluminum wire with a copper covering. Finally, the facility conducts fine wire drawing which draws aluminum wire into small diameter wire that is eventually used to weave a shielding around coaxial cable.

The facility generates hazardous waste flammable liquids from the cleaning of printer tips. The facility recently notified as a LQG because of a clean out of (31) 55-gallon containers of sodium hydroxide. In the past the facility has typically generated D002 waste sodium hydroxide and sulfuric acid generated from the bi-metal process. The facility has recently added two neutralization systems, within the last year, which has eliminated almost all of the D002 waste. The neutralization system is designed to mix waste sodium hydroxide and waste sulfuric acid together. The neutralized solution is

then discharged to the local POTW. The facility generates a variety of non-hazardous waste streams, which includes aluminum sludge and an emulsified water and oil mixture that is sent to a Subtitle D landfill.

The facility has previously crushed waste lamps and handled them as D009 hazardous waste. Mr. Crosby stated that the facility no longer conducts that process and waste lamps and batteries are managed as universal waste. The facility has three parts washers that are serviced by Crystal Clean. Receipts from Crystal Clean were available at the time of the inspection. Waste profiles are available for review. The facility launders waste cloth wipes through an outside contractor.

The facility typically does not generate more than 220 pounds of hazardous waste a month but the facility maintains the SQG status in case of future unexpected clean-outs. A SQG inspection was conducted.

At the time of the inspection I provide example letters, small quantity generator checklist, and web addresses for guidance information on hazardous waste regulations.

**7. Waste Type:**

- F003/F003/D035, waste flammable liquid (MEK)
- D002, waste sulfuric acid
- D002, waste sodium hydroxide solution
- D009, hazardous waste solid (mercury lamps)
- Used oil
- Universal waste lamps (fluorescent, HID)
- Universal waste batteries (ni-cad, alkaline)

**8. Areas of Inspection:**

Manifests:

All hazardous waste manifests were reviewed for the last three years. The manifests looked to be in good order and documented approved transporters and TSDFs. The facility's last hazardous waste shipment was sent out on manifest #03906, dated 3/9/05. A copy of the signed manifest was not available at the time of the inspection. A copy of the manifest waste faxed to the facility during the inspection.

Transporters: St. Joseph Motor Lines – PAD 987 358 587

TSD's: EQ Resource Recovery – MID 060 975 844  
Cleanlites Recycling – SCR 000 006 015 (universal waste)

### Weekly Inspections:

Inspection records are maintained electronically. Inspection records indicated that inspections were not conducted weekly on several occasions (see deficiency section). A recommendation was made to expand the weekly inspection log to include specific items inspected (see recommendation section).

### Training:

The facility conducts Haz-com training for all employees. The training includes spill response and labeling requirements. It is recommended that the facility develops and implements a training program for hazardous waste and universal waste management (see recommendation section)

### Emergency Preparedness:

The facility is maintained to prevent fire or releases. The facility's primary emergency coordinator is George Crosby. The facility is equipped with fire extinguishers, fire alarms, and spill control equipment. Unifour Fire & Safety tests all fire equipment monthly. The facility is equipped with a sprinkler system supplied by both municipal water and a well water system that includes a 200,000-gallon above ground storage tank. An outside contractor maintains the sprinkler system. Arrangements with local emergency agencies have not been made (see deficiency section). The facility conducts routine fire drills.

### Contingency Plan:

The facility has all the required information for a small quantity contingency plan but the plan has not been posted at phones at the facility (see deficiency section).

### Accumulation Areas:

The facility has one satellite accumulation area.

**Printer Tip Cleaning Area:** There was one 55-gallon container of waste MEK at the area. The container was properly labeled at the time of the inspection. Spills of hazardous waste were noted on the outside of the funnel, on the outside of the container, and on the wall behind the container (see deficiency section). The printing operation is not located near the satellite accumulation container but the printing units are moved to the satellite area before cleaning.

### Hazardous Waste Storage Areas:

The facility maintains one hazardous waste storage area. The storage area is located within the facility and is labeled with a "hazardous waste storage area" sign. There is a fire extinguisher located nearby and all personnel handling hazardous waste carry company issued cell phones. There was not any hazardous waste in the storage area at the time of the inspection.

### Used Oil and Universal Waste:

The facility generates used oil from routine equipment maintenance. The facility uses an outside contractor for all forklift maintenance. There were two 225-gallon totes of used oil located in the hazardous waste storage area. The containers were not properly labeled with the words "used oil" (see deficiency section). Several different used oil transporters collect used oil for the facility. Receipts for used oil collection were available at the time of the inspection.

The facility generates universal waste lamps. Universal waste is stored in the maintenance area of the facility. The last documented collection of waste lamps was on 5/9/05. There was one box of 4-foot waste fluorescent lamps in storage at the time of the inspection. The container was not properly labeled or closed (see deficiency section). I recommended that a container be designated for the collection and management of broken waste lamps (see recommendation section).

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

- 40 CFR 262.11 – CommScope is in violation of this regulation in that there was one 55-gallon container of material located outside, behind the facility. Mr. Crosby could not provide waste determination information at the time of the inspection. **Mr. Crosby stated that he used generator knowledge to determine that the container held rainwater. The material was placed into the evaporator used in the process area.**
- 40 CFR 262.34 (c)(1) – CommScope is in violation of this regulation in that spills of hazardous waste were observed on the outside of the funnel, on top of the container, and on the wall behind the 55-gallon satellite accumulation container located at the Printer Tip Cleaning Area. **Several small spills were still noted on the container. Mr. Crosby submitted a certification on 7/14/05 stating that the spills have been cleaned.**
- 40 CFR 262.34 (c)(1)(i) referenced at 40 CFR 265.173 (a) – CommScope is in violation of this regulation in that one 55-gallon satellite accumulation container, located at the Printer Tip Cleaning Area, was not properly closed at the time of the inspection. **The facility has installed a new funnel on the satellite accumulation container. The funnel was latched at the time of the inspection.**

- 40 CFR 262.34 (d)(2) referenced at 40 CFR 265.174 - CommScope is in violation of this regulation in that weekly inspections were not conducted on numerous occasions. Inspection of the facility's hazardous waste storage area must be conducted and documented at least every 7-days. **Mr. Crosby has begun keeping a weekly inspection log on his computer. I recommended that he show a back-up where the documents are located and that he trains a back for when he is not at the facility.**
- 40 CFR 262.34 (d)(4) referenced at 40 CFR 265. 37 – CommScope is in violation of this regulation in that Mr. Crosby stated that he did not have any knowledge or documentation to demonstrate that arrangements have been made with all local emergency agencies. **Arrangement letters were sent to all necessary agencies on July 1, 2005 by certified mail.**
- 40 CFR 262.34 (d)(5)(ii) – CommScope is in violation of this regulation in that the facility failed to post the name and phone number of the emergency coordinator, the location of fire extinguishers and spill control equipment, and the location of fire alarms, next to phones at the facility. **A completed copy of the SQG contingency plan was faxed to the MRO office on 7/14/05. Mr. Crosby certified that the plan has been posted.**
- 40 CFR 273.13 (d)(1) – CommScope is in violation of this regulation in that one container being used to store universal waste lamps was not properly closed at the time of the inspection. **Containers have been taped shut.**
- 40 CFR 273.14 (c)(4) - CommScope is in violation of this regulation in that one container used to store waste lamps were not labeled with the words “waste lamps”, “universal waste lamps”, or “used lamps”. **Containers have been labeled.**
- 40 CFR 279.22 (c)(1) – CommScope is in violation of this regulation in that there were two 225-gallon totes of used oil located in the waste storage area and neither container was properly labeled with the words “used oil”. **Both totes have been properly labeled.**

**\*All violations listed above must be corrected within 30-days of receipt of this report. A follow-up inspection will be conducted at that time. If violations are not corrected additional enforcement actions may be taken.**

**10. Recommendations:**

- It is recommended that a formal hazardous waste and universal waste training program be developed and conducted annually for all employees responsible for handling or managing hazardous waste.
- It is recommended that the weekly inspection log be expanded to include specific items inspected such as labeling, dating, checks for spills, deterioration, and accumulation time.
- It is recommended that a container be established for the collection of broken waste lamps. The container must remain closed and labeled.
- It is recommended that a spill kit be added to the hazardous waste storage area.

**11. Follow Up Actions:**

**On July 14, 2005 I conducted a compliance schedule evaluation at Commscope. I met with Mr. George Crosby at the time of the re-inspection. All violations have been corrected except for the posting of the small quantity generator plan. On July 14, 2005 Mr. Crosby faxed a copy of the contingency plan along with a certification that the plan has been posted.**

  
INSPECTOR (DATE)

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

cc:  
MRO Files  
Jesse Wells, Western Area Compliance Supervisor  
Central Office Files  
George Crosby, CommScope