



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 22 2006

4WD-RCRA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elizabeth Cannon, Chief
Hazardous Waste Section
North Carolina Department of Environment and Natural Resources
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605

SUBJ: RCRA Compliance Evaluation Inspection
Static Control Components, Inc.
EPA Nos. :
(NCR 000 005 108) - Plant 2 - LQG
(NCD 980 842 066) - Plant 17 - LQG
(NCR 000 135 174) - Plant 4 - CESQG

Dear Ms. Cannon:

On December 14, 2005, a Compliance Evaluation Inspection (CEI) was conducted by the United States Environmental Protection Agency (EPA) and the North Carolina Department of Environment and Natural Resources (NCDENR) at multiple locations of Static Control Components, Inc. in Sanford, North Carolina, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA oversight inspection.

Enclosed is the CEI report that indicates several violations of RCRA were discovered. Pursuant to the current RCRA Enforcement Response Policy, the facility has been determined by EPA to be a Secondary Violator.

If you have any questions regarding the inspection, please contact Rhonda Rollins, of my staff, by phone at (404) 562-8664 or by e-mail at rollins.rhonda@epa.gov.

Sincerely,

Doug McCurry, Chief
North Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch

Enclosure



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Dale Lewis, Co-V.P. of Manufacturing
Static Control Components, Inc.
Plants 2, 17, and 4
3010 Lee Avenue
P.O. Box 152
Sanford, NC 27331

SUBJ: RCRA Compliance Evaluation Inspection
Static Control Components, Plants 2, 17, and 4
Lee County, Raleigh, North Carolina
EPA Nos. : (NCR 000 005 108) - Plant 2 - LQG
(NCD 980 842 066) - Plant 17 - LQG
(NCR 000 135 174) - Plant 4 - CESQG

Dear Mr. Lewis:

On December 14, 2005, U.S. Environmental Protection Agency (EPA) and North Carolina Department of Environment and Natural Resources (NCDENR) representatives conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) at several locations for Static Control. This was an EPA oversight inspection for evaluating the facility's compliance at Plants 2, 17, and 4, with the applicable RCRA regulations.

Enclosed is the EPA RCRA Site Inspection Report which indicates that four (4) violations of RCRA were discovered. A copy of this report has also been forwarded to NCDENR. Enclosed is a copy of the Small Business information sheet for your use.

If you have any questions regarding the inspection, please contact Rhonda Rollins, of my staff, by phone at (404) 562- 8664 or by e-mail at rollins.rhonda@epa.gov.

Sincerely yours,

Doug McCurry, Chief
North Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch

Enclosures

cc: Debbie Bigelow - Static Control
Ted Cashion - NCDENR
Elizabeth Cannon - NCDENR

3) **Responsible Official**

Dale Lewis, Co-V.P of Manufacturing
800-356-2728
dalel@scc-inc.com

4) **Inspection Participants**

Debbie Bigelow	Static Control
Dale Lewis	Static Control
Kevin Godwin	Static Control
Ted Cashion	NCDENR
Rhonda Rollins	USEPA - Region 4

5) **Date of Inspection**

December 14, 2005

6) **Applicable Regulations**

40 Code of Federal Regulations (CFR) Parts 260-279,
Resource Conservation and Recovery Act (RCRA) Sections 3005 and 3007,
(42 US Code - Annotated U.S.C.A. 6925 and 6927),
Rules Governing Hazardous Waste Management in North Carolina

7) **Purpose of Inspection**

The purpose of the inspection was to conduct an unannounced U.S. Environmental Protection Agency (EPA) oversight compliance evaluation inspection and determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

8) **Facility Description**

Static Control, located in Sanford, North Carolina, operates multiple facilities (about 25) throughout the city, manufacturing components in business areas which encompass imaging, electronics, and static control equipment. Facility personnel estimated that the facilities in Sanford cover 900,000 square feet of manufacturing space, although not all generate hazardous waste. Since inspection of all 25 facilities was not possible, EPA and NCDENR focused on two large quantity generators (LQG)-Plants 2 and 17, and one conditionally exempt small quantity generator (CESQG)-Plant 4. This report encompasses those three facilities, in one report, with each EPA ID number noted as necessary.

Plant 2 ((NCR 000 005 108), operates as a LQG, conducting black oxide and electroless nickel plating. The facility operates one shift, with 23 employees. It encompasses a permitted wastewater treatment plant, multiple plating baths, machining area, and analysis lab. Plant 17 (NCD 980 842 066) is a LQG which operates 24 hours a day/5 days a week, with approximately 110 employees. This location generates primarily acids and solvents in its paint spray, re-manufacturing, and dips/stripping operations. Plant 4 (NCR 000 135 174), operates as a CESQG, and encompasses the facility's truck shop.

9) **Previous Inspection History**

The most recent RCRA CEIs were performed by the State on October 26, 2004. There were no violations noted during those inspections.

10) **Current Inspection Findings**

On December 14, 2005, Ted Cashion of the North Carolina Department of Environment and Natural Resources (NCDENR) and Rhonda Rollins with EPA arrived at Static Control at approximately 9:35 a.m. At the time of the inspection, the weather was extremely cold, with the potential for snowfall. The inspectors were received by Debbie Bigelow. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. The inspectors were later accompanied by Debbie Bigelow, and Security Manager, Kevin Godwin throughout the facility. The facility visit included an inspection of three of their Sanford locations, Plant 2 (LQG), Plant 17 (LQG), and Plant 4 (CESQG). This report encompasses those three facilities, in sequence, and is divided by facility.

PLANT 2 – (NCR 000 005 108) – PLATING OPERATIONS

• **Plating Baths/WWTP**

The plating baths are exhaust vented through a scrubber, with the water solution being sent to their onsite WWTP. At the time of the inspection, the baths were labeled as to their contents, and employees had PPE. At one end of the baths were 4 containers of waste nickel solution, labeled non-RCRA waste. Facility personnel indicated that they are picked up for nickel recycling, and provided MSDS and material profile. At the end of the WWTP process were two additional drums, containing about 3-5 inches of the same nickel solution. The facility's F006 sludge is collected at a SAA near the WWTP. The area is marked off, and labeled, and is collected under contract by Ecoflow. At the time of the inspection, there were no waste drums. There was a spill kit, fire extinguisher, phone, and emergency information nearby.

- **Machining Area**

This area had one drum in its SAA, containing rags with acetone, IPA and solvent wipes. The drum was properly closed and labeled. Nearby was a 55-gallon drum of used sandblast material. It was open, not labeled, and almost full. Facility personnel provided TCLP analyses that indicate it does not exceed any of the RCRA levels for metals, and therefore, is managed as non-hazardous waste.

- **Records Review**

The documents and records which were reviewed included the hazardous waste manifests, training and inspection records, Waste Minimization and Contingency Plans, and Biennial Report. At the time of the inspection, the Contingency Plan did not list the job descriptions, with requisite skills and education for its employees in these waste management positions.

Static Control is in violation of 40 CFR 265.16(d)(2) for failure to include job descriptions which list the requisite skill and education required.

PLANT 17 - (NCD 980 842 066) – MACHINING, STRIPPING OPERATIONS

- **Machining Area**

This semi-automated area is utilized in the manufacture of parts. Facility personnel indicated that no hazardous waste is generated in this area. This location does generate two special wastes, filter paper from grinding aluminum and steel (dust), and from their spray booth. Based on testing and certifications provided, these filter papers are disposed of by Republic Services in a landfill. The facility indicated that they would like to recover/reclaim the aluminum/steel dust. They were referred to the Pollution Prevention Pays Program (PPP) of North Carolina for possible technical assistance in this area. There were no RCRA violations noted in this portion of Plant 17.

- **90- Day Storage (Accumulation Shed)**

Plant 17's 90-Day storage area was fenced, locked, and labeled. The area had a fire extinguisher, a phone, and an eyewash station nearby. At the time of the inspection, the eyewash station was non-operational, possibly frozen due to the cold weather. Facility personnel determined a receptacle had been tripped, and were dispatched to fix it, while inspectors completed their visit. The storage area contained about 8 drums, of flammable liquids. They were all properly closed, labeled, and dated, with the oldest date of 12/7/05. There were no RCRA violations noted in this area.

- **90- Day Storage (Mix Kitchen)**

This area contained about 7 drums of hazardous waste. All were properly closed, labeled, and dated with the oldest date of 12/2/05. There was a fire extinguisher, phone, and emergency contact

information nearby. However, the phone had recently been moved, and the emergency contact information posted was in small font, and potentially difficult to read in an emergency.

EPA recommends that Static Control significantly increase the font of the emergency contact posting to allow for easy reading, and to post it closer to the phone's new location.

- **Stripping Operation**

Plant 17's stripping operation generates acids, methanol (MeOH), and isopropyl alcohol (IPA). At the time of the inspection, a moveable cart containing two 55-gallon drums of waste MeOH/IPA mixture was staged outside one of the stripping areas. The containers were labeled "Hazardous Waste", in addition to the specific contents. Ms. Bigelow stated the drums had been placed in this location less than 1 hour ago. Wastes were not actively being added to, or removed from these drums.

During various work shifts, the MeOH/IPA is drained from the stripping area into the drums, and the drums are moved back to the storage area. Since the drums had been left in this area, and wastes were not actively being added or removed, this area must be managed as a satellite area or a storage area. At the time of the inspection, both drums were almost full, exceeding the SAA 55-gallon limit, and were not actively been added or removed from (See Photo 1). The drums were dated 12/12/05 and 12/7/05. RCRA regulations require that wastes in excess of 55 gallons (the drum dated 12/7/05) must be moved from a satellite area into storage within 3 days.

Static Control staff was informed that they could operate it as a SAA or a storage area, but must meet the applicable labeling, dating, and management requirements. Due to safety and aisle space issues, the facility does not wish to operate this as a SAA, but were informed that they must alter this waste management practice to be RCRA compliant. At the time of the inspection, the facility had not removed the drum dated 12/7/05 (in excess of 55-gallons) from this location to the storage area.

Static Control is in violation of 40 CFR 262.34(c)(1) & (2) which indicates that a generator may accumulate as much as 55-gallons of hazardous waste in containers at or near the point of generation, as long as they comply with the labeling requirements, and date and remove any wastes in excess of 55-gallons within 3 days. In this case, since the wastes were being moved between stripping and storage, the accumulation dates did not meet the 3-day requirement. Static Control can either operate that area as a SAA, or ensure that after draining, the drums are immediately dated, and transferred to the storage area.

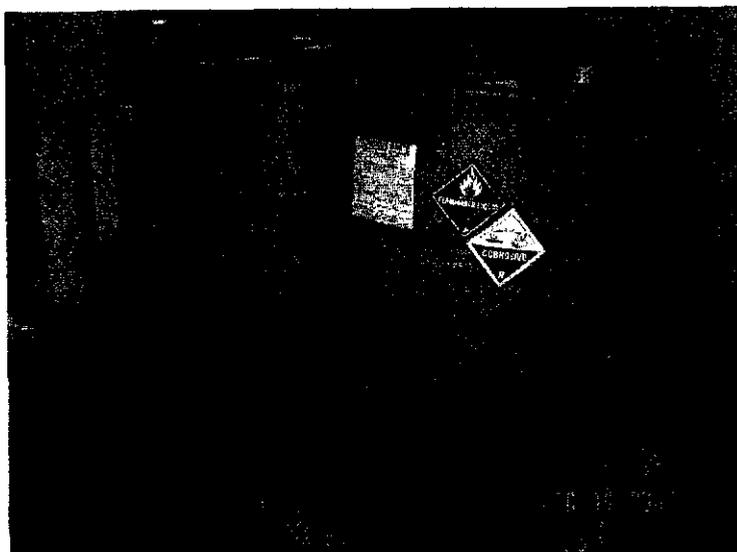


Photo 1 – Improper Management of SAA

- **Records Review**

The documents and records which were reviewed included the hazardous waste manifests, training and inspection records, Waste Minimization and Contingency Plans, and Biennial Report. At the time of the inspection, the Contingency Plan did not list the job descriptions, with requisite skills and education for its employees in these waste management positions.

Static Control is in violation of 40 CFR 265.16(d)(2) for failure to include job descriptions which list the requisite skill and education required.

- **Universal Waste**

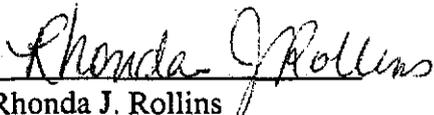
Based on information from facility personnel, Static Control's universal waste lamps are collected from across their locations, and stored temporarily in Plant 21. This is a small building, used primarily for storage, with no EPA ID number. While the lamps are collected in this building, they are transported by Static Control to Plant 17, prior to pickup. At the time of the inspection, Plant 21 contained three boxes of universal waste lamps, one 6ft, and 2 8 ft boxes. The boxes were properly labeled, and dated within one year, but all the boxes were open.

Static Control is in violation of 40 CFR 273.13(d)(1) which requires that a small quantity handler of universal waste contain lamps in structurally sound, closed containers.

PLANT 4 - (NCR 000 135 174) - TRUCK SHOP

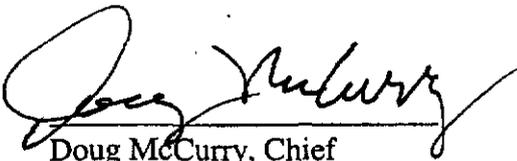
Plant 4, is a CESQG, which operates as Static Control's truck shop, performing general maintenance and upkeep on facility trucks. Wastes generated in this area include used oil, non-hazardous parts washer, and used rags. At the time of the inspection, there was one used oil drum, which was closed and properly labeled. The parts washer is shipped out periodically under contract by Noble. At the time of the inspection, there were no RCRA violations noted.

11) **Signed**


Rhonda J. Rollins
Environmental Scientist

1/23/06
Date

12) **Concurrence**


Doug McCurry, Chief
North Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch

2/9/06
Date