

Hazardous Waste Section  
File Room Document Transmittal Sheet

18

Your Name: Spring Allen (061)  
EPA ID: N C R 0 0 0 0 0 9 0 5 0  
Facility Name: Continental Automotive Systems, Inc.  
Document Group: Inspection/Investigation (I)  
Document Type: Compliance Evaluation Inspection (CEI)  
Description: cei with no violations  
Date of Doc: 12/8/2011  
Author of Doc: Spring Allen

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**File Room Use Only**

Date Recieved by File Room:  
Date Scanned:

Month	Day	Year
1	5	12
1	5	12

Scanner's Initials: *RHTB*

# RCRA INSPECTION REPORT

x= VIOLATION NOTED NA= NOT APPLICABLE

Facility Name: Continental Automotive Systems, Inc.  
Location: 1 Quality Way, Fletcher, NC 28732  
Mailing Address: 1 Quality Way, Fletcher, NC 28732  
EPA ID#: NCR 000 009 050 Phone Number: 828-654-2240  
Contact/ Title: Lisa Foster-Morrow Inspection Date: December 8, 2011  
Last Inspection: December 10, 2010 Status: Large Quantity Generator  
Type of Inspection: CSE Inspector(s): Spring Allen  
Present at Inspection: Troy Klutts, Wayne Rogers, Linda Dalmas, Steve Gornley  
Lisa Foster-Morrow (via phone)

Type of Business: Continental Automotive is a manufacturer of brake calipers. They operate within a 250,000 SF manufacturing building on a 40 acre tract of land. Processes include machining, plating, and assembly. The NAICS code is 33634. The facility and surrounding mixed industrial and residential community water and sewer is supplied by the City of Fletcher/ Hendersonville Metropolitan Sewer District. (MSD)

Wastes Generated: hazardous or regulated waste streams generated on-site:  
F006 Metal Hydroxide sludge D001/ 35/ F003/05 Mineral Spirits/ Acetone  
D007/ D008 HW liquid D001/35 Paint related  
D006/ 07 HW solid Zinc / Chromium D002 NaOH  
D007 solid - debris/ metal/ sediment Universal waste lamps  
Oily water treated by STAT Absorbent pads are recycled by CRI

Manifests: Approved Transporters? yes Approved TSD? yes  
Filled out correctly? yes Signed Copies? yes LDR Notification Attached? yes  
Comments - Manifests are in good order. LDR notification is included in the manifest book.

Transporters: STAT, Inc. NCD 980 799 112  
Thunderbird Trucking INR 000 123 497  
SMT, Inc. NCD 980 799 142

TSD's: Envirite of Ohio OHD 980 568 992  
Tradebe Treatment & Recycle, LLC IND 000 646 943  
Tradebe Treatment & Recycle, LLC TND 000 772 186  
IBS Environmental Services Universal Waste  
CRI Recycle Services WIR 000 029 751  
STAT, Inc. NCD 980 799 112 - oily water

## Waste Minimization:

The facility has an active waste minimization program in place. They track hazardous waste, solid waste, and energy usage. They include training as a basis of waste minimization efforts. They have re-lighted the building resulting in a significant decrease in energy usage. They have made state-of-the-art improvements to the plating and wwt system which has resulted in a cleaner effluent as well as a dryer sludge cake. Used cooking oils are recycled by Blue Ridge Bio-fuels. Future waste minimization efforts include relocating hazardous waste storage into a separate building. This will prevent overcrowding and assure aisle space maintenance.



**Inspection Records:** Weekly inspections are conducted every seven days as required. Inspection results are kept in a log book in the chemical storage/ HW storage room.

**Contingency Plan:** On-Site? yes Any Changes to facility/ processes or Emergency Coordinators since last review? no Are changes needed to the plan? no  
Has the plan been Implemented? no (If yes, comment about adequacy)

The contingency plan was last updated on November 2, 2009 The primary emergency coordinator is Lisa Foster-Morrow. The alternates are Rodney Baldwin, Brian Freeman, and Troy Klutz. The plan includes home addresses for ECs, evacuation plan, emergency equipment, and arrangements with emergency responders. The facility continues to work with the Mills River VFD and with the new personnel at the Fletcher FD. Emergency responders have copies of the plan and are prepared to respond to emergencies.

**Training Records:** Certified Training Records Available?  
Facility personnel attended off-site Lion Technology training and on-site Haz-Wopper, RCRA, DOT, Universal Waste and contingency plan review. Certificates for off-site training are in the training file and on-site records are kept in a computer data base. .

New Employees Since Last Inspection? no  
Evidence of Improper/ Inadequate Training? no

**Biennial Report Submitted:** The report was submitted on March 29, 2010.

**Emergency Preparedness:**

Facility Maintained and Operated to Prevent Releases? yes  
Internal Communications or Alarm Present? yes  
Portable Fire Extinguishers and/ or Fire Control Equipment? yes  
Spill Control Equipment: yes  
Adequate Water Volume, Foam Equipment or Sprinkler System? yes  
All equipment / alarms tested/ maintained? yes  
All Personnel Handling HW have access to Alarm/ Device? yes, cellular phones  
Adequate Aisle Space in operation areas? yes

**Satellite Accumulation Area(s):**

The facility operates two (2) 5-gallon containers for D002/7/8 waste in the plating lab, and one (1) 1- gallon container for D001 alcohol waste in the brake lab. They operate one 55-gallon container on the floor for accumulation of D001- mineral spirits and alcohol waste and one (1) 55-gallon container for holding D002. There are also three areas for accumulating oily wastes.

**Storage Area(s):** The storage area is located within a designated area in the chemical storage room. The area is a 50' X 50' containment room. At the time of inspection there was one (1) 55-gallon container holding D001 solid paint wipes, one (1) 55-gallon container holding D002 inorganic acid solids, one (1) 35-gallon container holding D001 aerosol residues, one (1) 55-gallon container holding used oil, and two (2) 55-gallon containers holding used absorbent waste in storage. There were also two (2) 55-gallon containers awaiting analysis for waste determination, and 2 boxes of 4' lamps, a 5-gallon bucket holding batteries and three 5-gallon buckets holding small or broken lamps. Each was labeled, dated, and closed as required. Additionally, there were nine (9) 55-gallon containers holding non-hazardous waste solids. Personnel carry cellular phones for communication.

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Containers closed? yes  
Evidence of Release? no

Aisle Space? yes  
<90 days? yes

Labeled? yes  
Good Condition? yes

**Site Deficiencies:** none noted

**Recommendations:**

The Following Recommendations are offered as part of the Compliance Evaluation Inspection conducted on December 08, 2011.

-The facility should continue the general plant-wide maintenance schedule as the plant looks clean and orderly.

Spring Denise Allen    12-08-2011  
Inspector                      (Date)

by mail  
Facility Contact                      (Date)

## Hazardous Waste Compliance Data Entry Form – Side A

EPA ID Number: NCR 000 009 050  
 Facility Name: Continental Automotive Systems, Inc.  
 Street: 1 Quality Way  
 City: Fletcher Zip: 28732 Phone: (828)654-2240  
 County: Henderson

**EVALUATION DATA**      New: XX      Change:           Delete:     

Date: 12/08/11      Evaluation Type: CEI  
 Date:   /  /        Evaluation Type:                     

Inspector ID #: 061      Reason:     

**Evaluation Comments:**      no violations noted

**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 evaluation)

**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