

**Hazardous Waste Compliance Date Entry Form - Side A**

**EPA ID Number** NCR000002212

**Facility Name** En-Cas Analytical Laboratories

**Street:** 2359 Farrington Point Drive

**Phone** (336) 785-3252

**City:** Winston Salem, NC 27107

**County** Forsyth

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

**Date:** 2/16/2009

**Evaluation Type**    CEI

**Date:**

**Evaluation Type**

**Inspector ID #** 043

**Reason:**

**Evaluation Comments**

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) \_\_\_\_\_
- no longer a SNC (SNN eval.) \_\_\_\_\_

**Docket #**

Waste Volume Involved	Exposure Media (a,gw,sw,s)	Distance to Residences	Number of People Involved	Distance to On-Site Wells	Distance to Off-Site Wells
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# 0    **Date Determined**    2/16/2009

**Branch:**

**Person::**

**Return to Compliance:**

\*Scheduled\*

\*Actual\*

**Reg. Description** None

**Comment:**



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

**RCRA INSPECTION REPORT**

**Facility Address**

En-Cas Analytical Laboratories  
2359 Farrington Point Drive  
Winston Salem, NC 27107

**Facility Contact** –Tim Ballard, President 336-785-3252

**EPA ID Number** –NCR000002212

**Inspector (s)** – Ernest Lawrence

**Date of Inspection** –February 16, 2009

**Last Inspection Date** –October 4, 1999

**Status** – The facility is listed as a SQG, but has been operating as a conditionally exempt SQG for several months. The facility must be in full compliance with Small Quantity Generator requirements in any month that over 220 pounds of hazardous waste is generated. The facility must closely monitor its monthly generation rate.

**Inspection Type** – CEI

**Present at Inspection** – Ernest Lawrence

**Facility Description**

En-Cas Analytical Laboratories is a contract research lab that works with agricultural chemicals to determine residues in food, soil, and water. The facility also does product chemical testing to determine percent purity. There is one building with five labs and an outside storage area.

**Wastes Generated**

D002, D008

**Manifests**

Filled Out Correctly - Yes

Signed Copies – Yes

LDR Notification Attached - Yes

Transporters - Freehold Cartage – NJD054126164

TSDF's- Environmental Enterprises, Inc. – OHD083377010

**Storage Area**

There is a hazardous waste storage area behind the building. At the time of inspection, there were three 55-gallon containers of hazardous waste. One was half filled with vials and the other two were filled with liquid

waste. Also, there were several 5-gallon containers of hazardous waste that had been collected in the labs.

Containers labeled "Hazardous Waste"? – Two 55-gallon containers and some of the 5-gallon containers of hazardous waste were not labeled "Hazardous Waste." Small quantity generators are required to label containers with the words "Hazardous Waste."

Containers dated when accumulation began? – Some of the containers of hazardous waste in the storage area were not marked with a starting accumulation date. Small quantity generators are required to mark containers with the starting accumulation date.

Containers compatible with waste? – Yes

Containers closed? – Not all of the containers were closed. Small quantity generators are required to keep containers of hazardous waste closed at all times except when adding or removing waste.

Managing incompatible waste? – Yes

Containers in good condition and not leaking? – Yes

Adequate aisle space – Yes

A telephone or two-way radio available at the scene of operation to summon emergency assistance? – No.

Small quantity generators are required to have a communication device in the storage area.

### **Inspection Records**

Weekly inspections of the hazardous waste storage area were not being recorded. Small quantity generators are required to make and record weekly inspections of the storage area.

Emergency arrangements made with fire, police, hospital, and emergency responders? – Dr. Ballard said that the fire department was familiar with facility layout, hazardous waste storage areas, and emergency exits. No emergency arrangements had been made with the hospital, police or an emergency response team that may be called upon in the event of a spill or other hazardous waste emergency. Example letters are available from the Hazardous Waste Section.

### **Satellite Accumulation Areas**

A number of 5-gallon and 20-liter satellite accumulation containers were observed in the labs. Also, there was a 1-gallon container for HPLC waste. Some of the containers were not closed and some were not marked or labeled hazardous waste or with other words to describe the contents. Small quantity generators are required to mark or label satellite containers.

Small Quantity Generators must keep satellite containers closed at all times except when adding or removing waste, including containers that collect waste from HPLCs. Containers must be closed to the extent that waste will not be released in the event it is overturned.

Emergency coordinator on premises or on call at all times? – Yes

### **Contingency Plan – Information posted next to the telephone**

Name and phone number of emergency coordinator? – No.

Location of fire extinguishers, spill control equipment, and fire alarm? – No

Number to the fire department, unless there is a direct alarm? – No

If the facility becomes a Small Quantity Generator the above information must be posted near the phone.

### Training

The generator has ensured that all employees that are involved with the handling of hazardous waste are thoroughly familiar with proper waste handling and emergency procedures? – Employees had not received RCRA training for a number of years. Small quantity generators are required to provide training to employees so that they can carry out their duties in a manner that is in compliance with RCRA requirements.

### Used Oil

No used oil was observed.

### Waste Counting

The facility must closely monitor its hazardous waste generation rate. Waste that is generated and stored prior to being placed in a distillation unit for recycling must be counted in the monthly waste generation totals. Also, corrosive wastes that will be neutralized must be counted if it is accumulated and stored prior to being placed in a container for elementary neutralization.

### Site Deficiencies

No violations of the RCRA requirements for Conditionally Exempt Small Quantity Generators were observed.

### Comments

It is recommended that the facility be in compliance with requirements for Small Quantity Generators in case over 220 pounds is generated in a month. The facility was not in compliance with a number of the requirements for Small Quantity Generators.

The facility must closely monitor its generation rate and be in full compliance with requirements for Small Quantity Generators any month that over 220 pounds of hazardous waste is generated.

A full description of requirements for Small Quantity Generators is available at:

<http://www.wastenotnc.org/HWHOME/WEBRules/NCHWRule.html>

Guidance information is available at <http://www.wastenotnc.org>

*East Laska* 2-23-09  
RCRA Inspector    Date

*Copy sent to Dept 17*  
Facility Contact