

Hazardous Waste Compliance Data Entry Form

R 4-28-08

EPA ID Number: NCR000001255

Facility Name: Loparex, Inc.

Street: 816 Fieldcrest Road

City: Eden ZIP: 27288 County: Rockingham

Contact Name: David Maust Phone#: 336-627-6409

EVALUATION DATA New:  Change:  Delete:

Date: 4 / 08 / 08 Evaluation Type: CEI

Date:  / /  Evaluation Type:

Inspector ID #: 045

Evaluation Comments:

Ticket NOV issued

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 # 2008-074  
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

Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08  / /   
Scheduled Actual

Regulation Description: 40 CFR 262.34(a)(1)(i)

Comment: HW not in containers

Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 / /  
Scheduled Actual

Regulation Description: 40 CFR 262.34(a)(4) ref. 265.16(d)

Comment: Facility did not maintain HW training records for 2 people who signed manifests

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Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 / /  
Scheduled Actual

Regulation Description: 40 CFR 262.34(c)(1)(ii)

Comment: 2 Satellite accumulation containers not labeled properly

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Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 / /  
Scheduled Actual

Regulation Description: 40 CFR 273.13(d)(1)

Comment: Universal waste lamps not stored in a container that prevented breakage and not closed

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Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 / /  
Scheduled Actual

Regulation Description: 40 CFR 273.14(c)(4)

Comment: Universal waste lamps not labeled properly

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Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 / /  
Scheduled Actual

Regulation Description: 40 CFR 273.15(a)

Comment: Universal waste lamps on site for more than one year

Waste Management Division  
Hazardous Waste Section

**NOTICE OF VIOLATION**

**To:** Loparex, Inc.  
816 Fieldcrest Road  
Eden, NC 27288

Docket #: 2008 - 074  
Inspection Date: April 8, 2008  
Facility Type: LQG

**EPA ID#: NCR 000 001 255**

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On April 8, 2008, Jenny Patterson representing the North Carolina Hazardous Waste inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Citation                      Specifics

- 1) **40 CFR 262.34(a)(1)(i): A generator may accumulate hazardous waste on site for 90 days or less without a permit provided the waste is placed in containers and complies with subparts I of 40 CFR 265.**

Hazardous waste was not being placed in the containers at the Mix Room liquid satellite accumulation container and at the Mix Room solid accumulation container. At each of these satellite accumulation areas, hazardous waste was observed on the top of the containers and on the floor around the containers. Also, plastic liners that were destined for the Mix Room solids container were placed on the floor of the Mix Room.

- 2) **40 CFR 262.34(a)(4) ref. 265.16(d): The owner or operator of a facility must maintain training records that include a job title, job description, type and amount of introductory and continuing training and records that document training for all personnel with hazardous waste management duties.**

The facility did not maintain hazardous waste training records for two people who signed hazardous waste manifests.

- 3) **40 CFR 262.34(c)(1)(ii): A generator may accumulate hazardous waste at satellite accumulation areas provided that the container are marked with the words "Hazardous Waste" or with other words that identify the contents of the container.**

The satellite accumulation container used at the flood booth was not labeled properly on the day of the inspection. Additionally, the label for the satellite accumulation container used in the Mix Room had fallen off the container. The facility must ensure that the containers, themselves are labeled properly.

**STATE OF NORTH CAROLINA  
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION**

**COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

**1. FACILITY INFORMATION:**

Facility Name: Loparex Inc.  
EPA ID Number: NCR 000 001 255  
Type of Facility: LOG  
Facility Location: 816 Fieldcrest Road, Eden, NC 27288  
Telephone Number: 336-627-6409

**2. FACILITY CONTACT:** David Maust – Technical Manager  
david.w.maust@loparex.com

**3. SURVEY PARTICIPANTS:** David Maust (Loparex) and Jenny Patterson (NCDENR)

**4. DATE OF INSPECTION:** April 8, 2008

**5. PURPOSE OF INSPECTION:** Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279 and to provide guidance as needed with the hazardous waste management requirements.

**6. FACILITY DESCRIPTION:**

Loparex operates as a manufacturer of coated products (including release liners, non-release liners and backing sheets) made primarily by coating and drying various materials onto paper substances. The majority of the material coated on paper is silicone making up 95% of the coated products. Other coatings include polyethylene, polypropylene, and some plastic films. These coated products are sold to adhesive markets.

The facility began operation in 1995. Loparex is situated on approximately 23 acres and consists of one 120,000 square foot building used for warehouse and office space and for manufacturing. Currently the facility employs approximately 100 people and operates twenty four hours a day, seven days a week in four shifts.

**7. WASTE STREAMS INCLUDE:**

Hazardous waste is generated from the flushing of lines, mismixed batches and leftover or cured products. Typical solvents used are toluene, alcohols, heptane, naphtha, and other similar solvents. The following waste streams were noted during the inspection:

- D001/D035/F003/F005 – waste flammable liquids (toluene, naphthalene) generated from “wash up coating” and “pumpable waste”
- D001/D035/F003/F005 – waste flammable solids (toluene, isopropyl alcohol), “non-pumpable solid waste”
- D001/D039 – waste petroleum naphtha from the one on-site parts washer

Other waste streams generated at the facility include:

Used oil and universal waste are also generated and managed at the facility.

duties, a written description of the type and amount of introductory and continuing training that will be given to each person with hazardous waste management duties, and records documenting that the initial RCRA training was performed and given annually. The facility must ensure that the personnel who act as emergency coordinators for hazardous waste incidents have appropriate job titles and descriptions. Facility personnel should receive training not only on general RCRA information, but also on site specific hazardous waste management issues (e.g. the facility's contingency plan). The facility also must maintain training records for any contractors who have hazardous waste management duties at the site.

On the day of the inspection, the facility had not maintained RCRA training records for two people (Ricky Hendricks and Darrell Joyce) who signed hazardous waste manifests.

- **Biennial Report:** The biennial report was submitted February 22, 2008. A copy of the report is maintained on site.
- **Waste Minimization:** The facility indicates that one of their waste minimization efforts includes reducing solvent use.
- **Accumulation Areas:** The satellite accumulation areas at the facility that were evaluated during the inspection are described as follows:
  - **Mix Room Satellite Accumulation - Liquids:** One 55-gallon container for the accumulation of D001/F003/F005 hazardous waste liquid. This container is located in the Mix Room. On the day of the inspection, the paper label that had been taped to the container had fallen off the container. The container was observed closed, but there was waste observed on the outside of the funnel and on the top of the container. There were also plastic liners observed on the floor of the Mix Room that were destined for the container used for the satellite accumulation for the solid hazardous waste material. The facility must ensure that housekeeping is maintained at this satellite accumulation area. Hazardous waste must be placed in containers and not on the container or floor. Any spills of hazardous waste must be cleaned up immediately.
  - **Mix Room Satellite Accumulation - Solids:** One 55-gallon container for the accumulation of hazardous waste solids such as gloves, rags and plastic liners. These materials are considered D001/F003/ F005 waste. This container is located outside of the Mix Room due to space constraints in the Mix Room. A compactor is used to compact the material in the container and free liquid is pumped out of the container and managed with the Mix Room liquid hazardous waste. The facility uses a magnet on the compactor to hold a label for the container. The facility must ensure that the hazardous waste container itself is labeled and not the compactor. A silicon and liquid material had oozed out from the top of the compactor and was observed on the top of the compactor and also on the floor near the compactor. Mr. Maust stated that the material that was on the outside of the container was the same as the material that is placed in the hazardous waste container. The facility must ensure that housekeeping is maintained at this satellite accumulation are. Hazardous waste must be placed in the container and not on the container or on the floor. Any spills of hazardous waste must be cleaned up immediately. Also, the plastic liners that were observed on the floor of the Mix Room must be placed in a hazardous waste container if they are being managed as hazardous waste.

**and continuing training and records that document training for all personnel with hazardous waste management duties.**

The facility did not maintain hazardous waste training records for two people who signed hazardous waste manifests.

- c) 40 CFR 262.34(c)(1)(ii): A generator may accumulate hazardous waste at satellite accumulation areas provided that the container are marked with the words "Hazardous Waste" or with other words that identify the contents of the container.**

The satellite accumulation container used at the flood booth was not labeled properly on the day of the inspection. Additionally, the label for the satellite accumulation container used in the Mix Room had fallen off the container. The facility must ensure that the containers, themselves are labeled properly.

- d) 40 CFR 271.13(d)(1): A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.**

On the day of the inspection, Loparex was accumulating universal waste lamps in an open topped metal bin. The container was not closed and the facility did not store the used lamps to prevent breakage.

- e) 40 CFR 273.14(c)(4): Each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)".**

The metal bin was labeled with the words "Used Light Bulbs". The container of used lamps was not labeled properly.

- f) 40 CFR 273.15(a): A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.**

Paperwork affixed to the metal bin indicated that the last universal waste shipment had been in 2005.

**10. RECOMENDATIONS:** The following recommendations are offered as part of the compliance inspection conducted on April 8, 2008:

- Housekeeping in the Mix Room and in the hall next to the Mix Room needs to be improved. It is recommended that the secondary containment under the Mix Room be cleaned out on a regular basis. The facility must make a waste determination on the material cleaned out from the secondary containment and if the material is a hazardous waste, the facility must manage and