

Hazardous Waste Compliance Data Entry Form

MW
6/9/08

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: 06 / 05 / 08 Evaluation Type: CSE

Inspector ID #: 045

Evaluation Comments:

In compliance with Ticket NOV docket #2008-074

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 06 / 05 / 08
Scheduled Actual

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

Comment: HW not in containers **IN COMPLIANCE**

Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 06 / 05 / 08
Scheduled Actual

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

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

Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 06 / 05 / 08
Scheduled Actual

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

Comment: 2 Satellite accumulation containers not labeled properly **IN COMPLIANCE**

Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 06 / 05 / 08
Scheduled Actual

Regulation Description: 40 CFR 273.13(d)(1) **IN COMPLIANCE**

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

Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 06 / 05 / 08
Scheduled Actual

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

Comment: Universal waste lamps not labeled properly **IN COMPLIANCE**

Date Determined: 04 / 08 / 08

Branch: 07 Person: 045

Return to Compliance: 05 / 30 / 08 06 / 05 / 08
Scheduled Actual

Regulation Description: 40 CFR 273.15(a) **IN COMPLIANCE**

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

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

COMPLIANCE SCHEDULE EVALUATION (CSE) 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. EVALUATION PARTICIPANTS: David Maust (Loparex) and Jenny Patterson (NCDENR)

4. DATE OF EVALUATION: June 5, 2008

5. PURPOSE OF EVALUATION: Follow-up inspection to determine status of compliance with the Ticket Notice of Violation Docket # 2008-074. The NOV was issued subsequent to the RCRA inspection conducted on April 8, 2008.

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.

8. AREAS OF REVIEW AND EVALUATION: The areas not reviewed were not applicable to this evaluation, as there were no violations noted during April 8, 2008 inspection. The following areas were reviewed during the CSE:

- **Training Records:** The facility now trains and maintains documentation of training for everyone with hazardous waste management duties.
- **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 evaluation, the container was observed in compliance. The facility is no longer placing waste material which is destined for the Mix Room solids satellite accumulation area around the container for the Mix Room liquids hazardous waste. The facility is now cleaning up any waste that is not placed in this container.
 - **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. On the day of the evaluation, this container was observed in compliance. The facility had cleaned up the hazardous waste that was observed on and around the compactor.
 - **Flood Booth:** One 5-gallon flame arrester container used for the accumulation of contaminated rags and gloves generated from dye staining coated products to perform off machine quality control check. In the inspection report, it was noted that this container was not labeled properly. This container had actually been properly labeled during the April 8, 2008 inspection, the label was just not clearly visible for inspection and was inadvertently missed during the inspection. The container is now labeled "Hazardous Waste" on the top of the container so it is clearly visible.
- **Storage Areas:**
 - **Universal Waste:** Used Lamps are accumulated in an open topped metal bin that is located under the Maintenance Shop steps. Closed cardboard boxes containing used lamps are stored in this metal bin. On the day of the evaluation, there was one box of used lamps observed in the metal bin. The container was closed and labeled properly. The facility has a copy of the last shipping papers affixed to the bin indicating that the last shipment of universal waste lamps occurred May 1, 2008.

9. SITE DEFICIENCIES: Violation(s) previously cited pertained to the following regulations:

- a) **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.

IN COMPLIANCE: The facility now places hazardous waste in containers. Spills of hazardous waste are now promptly cleaned up.

- b) **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.**

IN COMPLIANCE: The facility now trains all personnel with hazardous waste management duties.

- 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.**

IN COMPLIANCE: All containers of hazardous waste are now properly labeled. The satellite accumulation container used at the flood booth was actually labeled during the April 8, 2008 inspection, but the label was not clearly visible for inspection and was inadvertently missed during the inspection.

- d) **40 CFR 273.13(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.**

IN COMPLIANCE: Universal waste lamps are now stored in containers that are closed and the facility stores the used lamps to prevent breakage.

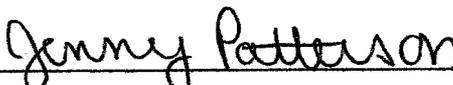
- e) **40 CFR 273.14(c)(4): Each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)".**

IN COMPLIANCE: The facility now labels the containers of used lamps 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.**

IN COMPLIANCE: The facility affixes the shipping papers to the metal bin containing the used lamps which indicates that the last universal waste shipment was on May 1, 2008.

10. CONCLUSIONS: Loparex, Inc. was found in compliance with Ticket Notice of Violation Docket #2008-74. This Ticket Notice of Violation was issued for the site deficiencies noted during the Compliance Evaluation Inspection conducted on April 8, 2008.



Jenny Patterson
Environmental Senior Specialist, NCDENR

Date: June 6, 2008