

**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. INSPECTION PARTICIPANTS:** David Maust (Loparex), David Hulse – Production Manager (Loparex) and Jenny Patterson (NCDENR)

**4. DATE OF INSPECTION:** July 23, 2009 and July 28, 2009

**5. PURPOSE OF INSPECTION:** 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. A Compliance Evaluation Inspection was last performed 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.

**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 INSPECTION:

- **Emergency Preparedness:** The facility is operated and maintained to minimize the possibility of fire or any unplanned sudden or non-sudden release of hazardous waste that could threaten health or the environment. The facility has an internal alarm that provides emergency instruction to personnel in the event of an emergency. There is a pull down alarm in the Chemical Storage Room that signals the fire department. Facility personnel who handle hazardous waste in the storage area have access to a telephone outside of the hazardous waste storage area (at the work station for the Dock Operator or in the Maintenance Shop) to summon emergency assistance if necessary. The facility has fire extinguishers and spill control equipment available near the hazardous waste storage area. The emergency equipment is tested and maintained. Fire extinguishers and evacuation alarm are tested monthly. Spill control equipment is inspected monthly by an internal safety checklist. The sprinkler system and foam deluge are checked annually. Arrangements have been made with the local emergency authorities through letters dated January 15, 2009 and through submittal of the contingency plan to familiarize them with the facility and the hazardous waste handled at the facility.
  
- **Contingency Plan:** The facility maintains a contingency plan on site that describes the actions personnel must take to respond to an emergency. The plan was last updated in November 2008. The plan includes the following: a list of emergency coordinators with their home and work addresses and phone numbers; a description of the arrangements made with the local emergency authorities (copies of the arrangement letters that were sent to the local emergency authorities); a physical description of the emergency equipment used at the less than 90 day storage area in the event of an emergency with the location of the equipment; and a description of the evacuation routes from the less than 90 day storage area. The plan has been distributed to the local emergency authorities as required.
  
- **Inspection Records (storage):** The Facility performs weekly inspections and documents them on a form. Three years of inspection records are kept on-site.
  
- **Manifests / LDR:** Manifests were reviewed from calendar years 2008 and 2009. The manifests appear to be complete and correct. The facility uses the following hazardous waste transporters and TSDs:
  - Transporters: Industrial Waste Services – SCR000762245  
Safety Kleen – TXR000050930 (parts washer waste)
  - TSD's: Giant Resource Recovery – SCD036275626  
Safety Kleen – NCD077840148 (parts washer waste)
  
- **Training Records:** RCRA training was last performed in November 6, 2009 and January 14, 2009. Training records include job titles and descriptions.
  
- **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:
  - **Coater 19 Mix Room - 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 container was observed closed and properly labeled. Housekeeping at this satellite accumulation area was greatly improved from the April 8, 2008 compliance evaluation inspection. The facility must ensure that housekeeping is maintained at this satellite accumulation area.

- **Coater 19 Mix Room - 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. 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 container was closed and labeled. The Mix Room Solids container is located near the Mix Room Liquids satellite accumulation container, but is considered a separate satellite accumulation area. Housekeeping at this satellite accumulation area was greatly improved from the April 8, 2008 compliance evaluation inspection. The facility must ensure that housekeeping is maintained at this satellite accumulation area.
- **Coater 19 Coating Enclosure:** One 55-gallon container for the accumulation of hazardous waste liquids. This container was observed labeled and closed.
- **Coater 19 Breezeway:** One 5-gallon flame arrester can used for the accumulation of solid materials (gloves and rags) contaminated with solvents. This container was labeled and closed.
- **Coater 10 Mix Room - Solids:** One 55-gallon container used for the accumulation of solid materials such as gloves, rags and plastic liners. This container was in compliance
- **Coater 10 Mix Room - Liquids:** One 55-gallon container used for the accumulation of liquid hazardous waste. This container is located near the Coater 10 Mix Room Solids container but is considered a separate satellite accumulation container. This container was observed in compliance.
- **Coater 10:** One 5-gallon flame arrester container used for the accumulation of rags and gloves. This container was observed in compliance.
- **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. This container was labeled. The facility must ensure that this container is properly closed unless waste is being added or removed from the container.
- **Maintenance Shop Aerosol Can Puncturer:** One 55-gallon container with an aerosol can puncturer attached to the top of the drum. This container was labeled and closed. A plastic bin is used to accumulate aerosol cans prior to puncturing them.
- **Storage Areas:** The facility has one less than 90 day storage area described as follows:
  - **Storage Area:** This storage area is located inside the facility's main building in the Chemical Storage Room. On the day of the inspection there were seventeen 55-gallon containers in the storage area. The containers were observed in compliance. All storage area requirements were met.

- **Used Oil:** Used oil is stored in the Chemical Storage Room. On the day of the inspection there were three 55-gallon containers of used oil observed in this area. All used oil containers were labeled properly. The facility must ensure that spills of used oil are cleaned up immediately.
- **Universal Waste:** Used Lamps are accumulated in an open topped metal bin that is located under the stairs in the Maintenance Shop. Inside the bin, used lamps are placed in cardboard boxes that are closed and labeled properly. Shipping papers are affixed to the side of the bin to indicate the last shipment of universal waste lamps occurred in May 2009. Universal waste lamps are recycled through Lamp Tracker.

**9. SITE DEFICIENCIES:** There were no violations noted during the July 23, 2009 compliance evaluation inspection.

**10. RECOMENDATIONS:** There are no recommendations offered as part of the compliance evaluation inspection conducted on July 23, 2009.

Jenny Patterson Date: 8/3/09  
Jenny Patterson  
Environmental Senior Specialist, NCDENR