

**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: The Procter & Gamble Distributing LLC, CP-II and CP-III Buildings
EPA ID Number: NCR 000 143 834
Type of Facility: LOG
Facility Location: 6104 Corporate Park Drive, Browns Summit, NC 27214
Mailing Address: P.O. Box 18647, Greensboro, NC 27419

2. FACILITY CONTACT: April Haley – HS&E Leader of Distribution Department

3. INSPECTION PARTICIPANTS: April Haley (Procter & Gamble), Broderick Rogers - NA Quality Assurance Manager (Procter & Gamble), Shawn Johnson – Scrap Donate Leader (Procter & Gamble), Dawne Wilson - Scrap Donate Coordinator (Procter & Gamble), Johnny Carter – Apollo Program Manager (Clean Harbors), and Jenny Patterson (NCDENR)

4. DATE OF INSPECTION: November 13, 2008

5. PURPOSE OF INSPECTION: Audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279. There is no record that this facility has been inspected prior to this inspection.

6. FACILITY DESCRIPTION:

The Procter & Gamble Distributing LLC, CP-II facility is located at 6104-A Corporate Park Drive. The Procter & Gamble Distributing LLC, CP-III facility is located at 6104-B Corporate Park Drive. The two facilities are on contiguous property, located in Browns Summit, and operate under one EPA Identification number.

The CP-II facility was built in June 2007. The building is 240,000 square feet and is used as a warehouse for finished consumer products manufactured by Procter & Gamble.

The CP-III facility was built in early 2008. The building is 240,000 square feet and is used as a warehouse for finished consumer products manufactured by Procter & Gamble.

The two facilities notified as a large quantity generator of hazardous waste in July 2008. Occasionally large shipments of expired consumer commodities have to be shipped from the site as hazardous waste. Typically smaller amounts of hazardous waste are generated due to consumer commodities being damaged on site.

7. WASTE STREAMS INCLUDE:

Hazardous waste is generated from expired or damaged product. The facility produces the following hazardous waste streams:

- 4) Universal waste may not be kept on site for more than one year. It is recommended that the containers be marked with an "accumulation start date" so the facility can track the amount of time the universal waste is on site.
- 5) The facility must inform all employees who handle or have the responsibility for managing universal waste about the proper handling and emergency procedure appropriate to the type(s) of universal waste handled at the facility.
- 6) The facility must respond to releases of universal waste immediately.
- 7) A small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility or a foreign destination.

9. SITE DEFICIENCIES: There were no violations noted during the compliance evaluation inspection conducted on November 13, 2008.

10. RECOMENDATIONS: There are no recommendations offered as part of the compliance evaluation inspection conducted on November 13, 2008.

Jenny Patterson
Jenny Patterson
Environmental Senior Specialist, NCDENR

Date: NOV 26, 2008

- D001 – Waste flammable liquid (alcohols, aerosols)
- D002 – Waste corrosive liquid (hair coloring products)

The facility also generates universal waste lamps.

- **Emergency Preparedness:** Both facilities are 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 facilities have internal alarms that provide emergency instruction to personnel in the event of an emergency and facility personnel who handle hazardous waste in the storage areas have access to a telephone to summon emergency assistance if necessary. A fire extinguisher and spill control equipment are available in each of the hazardous waste storage areas. The emergency equipment is tested and maintained. The fire extinguishers and emergency exits that would be used in the event of an emergency at the less than 90 day hazardous waste storage areas are inspected weekly. Arrangements have been made with the local emergency authorities to familiarize them with the facilities and the hazardous waste handled at the facilities.
- **Contingency Plan:** A full contingency plan is maintained at the CP-II facility. A partial contingency plan which includes important contact information and instructions on how to respond during an emergency is maintained at the CP-III facility. The contingency plan describes the actions personnel must take to respond to an emergency. The plan also 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; a description of the signal used to begin evacuation of the facility; 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 brief description of the capabilities of the equipment; and a description of the evacuation routes from the less than 90 day storage areas. The contingency plan was submitted to the local emergency authorities as required.
- **Inspection Records (storage):** Inspections of the less than 90 day storage areas are performed on a weekly basis and logged on an inspection form. The inspection forms are maintained at the respective hazardous waste storage areas.
- **Biennial Report:** Since the facilities did not become large quantity hazardous waste generators until July 2008, the facility was not required to file a 2007 Biennial Hazardous Waste Report. The next biennial report will be due on March 1, 2010.
- **Training Records:** Personnel with hazardous waste management duties receive annual hazardous waste training at different times during the year. The training includes a review of hazardous waste management and the contingency plan. Job titles and job descriptions for personnel with hazardous waste management duties (including contractors who have hazardous waste management duties) are maintained at the facility. Chris Junk and Dawne Wilson are the key hazardous waste managers at CP-II and CP-III, respectively. Both received their annual RCRA review earlier in November 2008. Job titles and job descriptions for Chris Junk and Dawne Wilson are maintained on site.

- **Manifests / LDR:** Manifests for 2007 and 2008 were reviewed and were in good order complete with signed copies. Land ban notifications were also reviewed and found to be complete. Even though the two facilities share an EPA ID number, manifests are maintained at each respective facility. The following hazardous waste transporters and disposal companies were used:
 - Transporters: Clean Harbors – MAD039322250
Robbie D Wood - ALD067138891
 - TSD's: Clean Harbors – NCD000648451

- **Waste Minimization:** Efforts to reduce hazardous waste include better inventory control.

- **Satellite Accumulation Areas:**

At each facility, one area is maintained within the warehouse that has both satellite accumulation containers and a 90 day storage area. When consumer goods are damaged, warehouse personnel place the damaged container(s) in cubic yard box called a "Damage Bin". Trained personnel determine if any of the material could be donated and reused. If the material can not be donated, then it is placed in one of the three 55-gallon satellite accumulation containers. The facility maintains one 55-gallon container used for the accumulation of damaged hair coloring products, one 55-gallon container used for the accumulation of waste aerosol containers, and one 55-gallon container used for the accumulation of alcohol containing products. Each of these containers is considered a separate satellite accumulation container. The satellite accumulation containers were observed in labeled and closed.

- **Hazardous Waste Storage Areas:**

Each facility has one hazardous waste storage area located near the satellite accumulation and Damage Bin. When the satellite accumulation containers are full, trained personnel mark the container with an accumulation start date and move the container to the near by less than 90 day hazardous waste storage area. On the day of the inspection, there was no hazardous waste observed in the storage area. Located at the storage area were a fire extinguisher, spill control equipment, and a telephone. The storage area met all emergency preparedness and prevention requirements.

- **Universal Waste:** On the day of the inspection, no universal waste was observed on site. Universal waste regulations, found at 40 CFR 273, apply to used lamps, batteries, mercury containing equipment and pesticides. The facility must ensure compliance with the universal waste regulations if the facility manages these items. The following is a summary (not all inclusive) for the management of universal waste.
 - 1) Universal waste must be stored in a way that prevents releases of any universal waste or component of universal waste to the environment.
 - 2) The universal waste must be stored in containers that are kept closed, structurally sound, adequate to prevent breakage and compatible with the contents of the container.
 - 3) The containers must be labeled with the words "Universal Waste _____", "Waste _____" or "Used _____".