

Hazardous Waste Section
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17

Your Name: Kelly Galantis
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Facility Name: Techinal Coatings International
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

OCT 02 2014

Julie Woosley, Chief
Hazardous Waste Section
North Carolina Department of Environment and Natural Resources
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

SUBJ: RCRA Compliance Evaluation Inspection
Technical Coatings International
EPA ID. No.: NC0 000 366 757

Dear Ms. Woosley:

On June 5, 2014, a compliance evaluation inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the State of North Carolina Department of Environment and Natural Resources- Division of Waste Management (NCDENR) at Technical Coatings International in Leland, North Carolina, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA lead inspection.

Enclosed is the EPA RCRA Site Inspection Report which indicates that deficiencies of RCRA were discovered. If you have any questions regarding this matter, please contact John C. Goodwin, of my staff, by phone at (404) 562-8488 or by email at goodwin.john@epa.gov.

Sincerely,

Nancy McKee, Chief
North Enforcement and Compliance Section
RCRA and OPA Enforcement and
Compliance Branch
RCRA Division

Enclosure

cc: Bobby Nelms, NCDENR





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OCT 02 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sean Moody
President
Technical Coatings International
150 Backhoe Road
Leland, North Carolina 28451

SUBJ: RCRA Compliance Evaluation Inspection
Technical Coatings International
EPA ID. No.: NC0 000 366 757

Dear Mr. Moody:

On June 5, 2014, a compliance evaluation inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the State of North Carolina Department of Environment and Natural Resources-Division of Waste Management (NCDENR) at Technical Coatings International located in Leland, North Carolina, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA lead inspection.

Enclosed is the EPA RCRA Site Inspection Report which indicates that deficiencies of RCRA regulations were discovered. A copy of this report has also been forwarded to NCDENR. Please provide a detailed written response **within fourteen (14) days** following receipt of this letter describing any actions that the Facility has taken and/or intends to take in relation to the observations documented in the RCRA CEI Report. Your response should be mailed to:

John C. Goodwin
North Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch
RCRA Division
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

If you have any questions regarding this matter, please contact John C. Goodwin, of my staff, by phone at (404) 562-8488 or by email at goodwin.john@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy McKee". The signature is stylized and somewhat cursive.

Nancy McKee
Chief, North Enforcement and Compliance Section
RCRA and OPA Enforcement
and Compliance Branch

Enclosure

RCRA Inspection Report

1) Inspector and Author of Report

John C. Goodwin
Environmental Engineer
RCRA and OPA Enforcement and Compliance Branch
EPA Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8488

2) Facility Information

Technical Coatings International
150 Backhoe Road
Leland, North Carolina 28451

(910) 371-0860

EPA Id. No.: NC0 000 366 757

3) Responsible Official(s)

Sean Moody, President
Technical Coatings International

4) Inspection Participants

Sean Moody, Technical Coatings International
Bobby Nelms, Environmental Senior Specialist, Division of Waste Management, North Carolina
Department of Environment and Natural Resources (NCDENR)
John C. Goodwin, USEPA Region 4

5) Date of Inspection

June 5, 2014

6) Applicable Regulations

40 Code of Federal Regulation (C.F.R.), Parts 261, 262, 264 – 266, 268, 270, 273, & 279
Resource Conservation and Recovery Act (RCRA) Sections 3005 and 3007, (42 US Code –
Annotated U.S.C.A. 6925 and 6927), and Title 15A Chapter 13, North Carolina Administrative
Code (NCAC).

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced U.S. Environmental Protection
Agency compliance evaluation inspection (CEI) at Technical Coatings International (hereinafter,

TCI, or the "facility") to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

8) Facility Description

TCI is a laminate manufacturer and processor of roll goods for various customers and applications. Manufacturing processes use solvent based and water based ingredients; however, mostly water based ingredients are used. The facility is located on four acres of land and the facility operates Monday to Thursday, 9:00 a.m. - 8:30 p.m. Approximately 30 employees work at this location. The facility is registered as a large quantity generator (LQG) of hazardous waste, but typically manages its facility as a small quantity generator (SQG) of hazardous waste.

9) Inspection Findings

John C. Goodwin, EPA, and Bobby Nelms, NCDENR, arrived at TCI around 10:00 a.m. on June 5, 2014. Sean Moody received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. All drums noted within the report are 55-gallons in capacity, unless noted otherwise.

Production Area

The facility operates four coating lines. Two of the four lines were in operation at the time of the inspection. Line 3 was the first line inspected. An aluminum coating was being applied to the polyester fabric on a roll. Any unused laminate compounds are stored in the Quonset Hut. A container of solvent contaminated waste rags was loosely covered and unmarked. The waste rags should be kept closed and marked with the words, "Excluded Solvent-Contaminated Wipes," if the facility wishes to manage them under the solid waste exclusion of 40 C.F.R. § 261.4(a)(26).

One properly marked container of used oil was observed between Lines 1 and 2. Line 4 is in the center of the room and is connected to the air emissions incinerator. It was not in operation at the time of the inspection.

A metal recycling collection point was observed between Lines 2 and 4. These lines were not in operation.

The inspectors observed another container of solvent contaminated waste rags that were not marked between Line 2 and the Small Quantity Mixing Area.

Small Quantity Mixing Area

The Small Quantity Mixing Area connects the Quonset Hut and Production Areas. The facility uses this area to mix the compounds for roll applications. No apparent RCRA regulated wastes were observed in this area.

Quonset Hut

The Quonset Hut is used to store production materials and compounds. Hazardous waste is also stored in this area. The facility conducts a yearly inventory and identifies any materials that will not be reused. At that time, a waste determination is made on the subject solid wastes and

managed as such. Numerous drums were observed in the area, totaling approximately 300. The room was not climate controlled. No marked hazardous waste containers were observed in the room. Two 4,000 gallon ethyl acetate storage tanks were located outside of the Quonset Hut. The majority of the solvent based coatings utilize ethyl acetate and toluene is the secondary solvent based option. The facility claims that all materials are reusable at the time they are placed back into the Quonset Hut.

Converting Department

The rolls are cut to size in the Converting Department then placed into the product storage area prior to shipping.

The facility stores universal waste lamps on the mezzanine, which is located above the offices. One box of waste lamps was dated and marked "accumulation." The container was not closed. The deficiencies were corrected at the time of the inspection.

Pursuant to 15A NCAC 13A.0119 [40 C.F.R. § 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.

Pursuant to 15A NCAC 13A.0119 [40 C.F.R. § 273.34(e)], containers of the lamps must be labeled or marked clearly with the words, "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps."

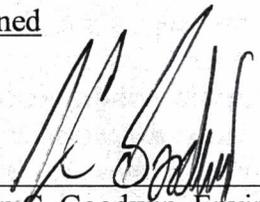
Records Review

The inspectors requested the following documents for inspection: waste manifests, personnel training records, weekly inspection logs, contingency plan, waste minimization plan, and biennial report. The last Land Disposal Restriction document was sent with a shipment in September 2010. Giant Resource Recovery (EPA ID # SCD 036 275 525) currently accepts the facility's hazardous waste. The facility has shipped waste to Environmental Options (EPA ID # VA0 000 122 994) in Virginia for some of the previous hazardous waste. The weekly inspections did not identify any hazardous waste rags in storage. The waste rags are not identified separately from the other waste streams.

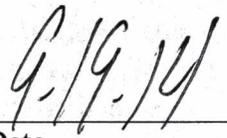
The hazardous waste handlers can also include the "coater operators" for transfer of the hazardous waste to the storage areas. Every employee is trained in hazardous waste although the coater operator job description did not identify such activities.

Pursuant to 15A NCAC 13A.0107 [40 C.F.R. § 262.34(a)(4)], which references 15A NCAC 13A.0110 [40 C.F.R. § 265.16], facility personnel must be provided with training to ensure the facility's compliance with this part. The facility must also perform an annual review of the initial training. A written job description for each position at the facility related to hazardous waste management must be maintained. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.

10) Signed

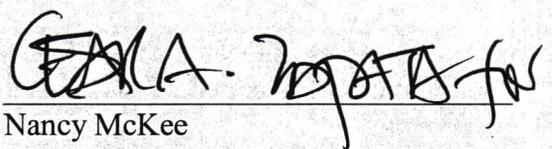


John C. Goodwin, Environmental Engineer
North Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch

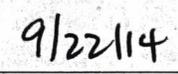


Date

Concurrence



Nancy McKee
Chief, North Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch



Date