

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: Mark Burnette

Facility ID Number: NCD000822957

Facility Name: Energizer

Document Group: Inspection/Investigation (I) **Document Type:** I - Compliance Evaluation Inspection (CEI)

Description for File (for CARA):

Date of Document: 4/28/2015

Author(s) of Document: Mark Burnette

Inspector ID #: NC044

Suborganization: Western Region

Comments for RCRAInfo: LQG

County (if not on report): Randolph

For Violations:

Enforcement Date: [Click here to enter a date.](#)

Docket Number:

Enforcement Type:

How many violations were there?

For IANOV or CO: The facility is

Outcome Measures for CSE for IANOV or CO:

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

Violation #1:

Date Determined: [Click here to enter a date.](#)

Scheduled Return to Compliance: [Click here to enter a date.](#)

Actual Return to Compliance: [Click here to enter a date.](#)

Regulation Description:

Comment:

For CSE, Corrections to Violations were:

Violation #2:

Date Determined: [Click here to enter a date.](#)

Scheduled Return to Compliance: [Click here to enter a date.](#)

Actual Return to Compliance: [Click here to enter a date.](#)

Regulation Description:

Comment:

For CSE, Corrections to Violations were:



North Carolina Department of Environment and Natural Resources
 Division of Waste Management
 Hazardous Waste Section

Large Quantity Generator Inspection Report*

Facility Name: Energizer Date: 4/28/15
 Site Address: 419 Art Bryan Drive, Asheboro, NC 27203 (Verified in RCRAInfo? Y/N)
 Mailing Address: same
 EPA ID #: NCD 000 822 957
 Site Contact: Scott Boyle Title: Staff Environmental Coordinator
 Phone Number: 336-672-4546
 Email: scottv.boyle@energizer.com
 Inspector: Mark Burnette
 Participants: Scott Boyle, Tim Brown, Mark Burnette
 Legal Owner of Business: Energizer
 Legal Owner of Property: Energizer
 Generator Status: SQG Determined by: a. Statement from:
 b. Manifests: X
 c. HW on-site (amount):

Facility Description: Site acreage: 35 Operating shift(s): 4 # Employees: 435
 Water supply: municipal/well Waste water treatment: municipal/septic/on-site treatment
 Distance to on-site/off-site wells: Closest private residence: 1/4 mi

Facility Description (No. of buildings, size of buildings, operations conducted, locations HW is generated):

Energizer is a manufacturer of various types of batteries. Although the facility is listed as a large quantity generator (LQG) they operate as a small quantity generator (SQG). They generate waste from their line flushes, waste wipes and clean up processes.

Waste Streams (hazardous waste, universal waste, used oil, non-RCRA regulated waste, non-hazardous waste):

TYPE WASTE	COMMON NAME	WASTE CODE
Hazardous Waste Solids	TCE	F002
Waste Flammable Liquids	TCE	D001, F002
Waste Corrosive Liquids	monoethanolamine	D006, D008, D018, D027, D039, D040

*NOTE: This document is for assistance only. For complete regulations refer to Title 40 of the Federal Code of Regulations Part 260-279. This form does not contain all of the North Carolina Hazardous Waste Regulations and many of the regulations described are paraphrased. Division website located at: <http://portal.ncdenr.org/web/wm/hw>

Document Review

- **262.11- Hazardous Waste Determination** *Compliance Yes/No
Generators must determine if their waste is hazardous.
- **261.2(f) – Documentation of claims material is not solid waste** *Compliance Yes/No
Generators must document claims that materials are not solid wastes or are conditionally exempt from regulations.
- **262.12- EPA ID Numbers** *Compliance Yes/No
(a) Generators must acquire an EPA ID Number before they offer hazardous waste for shipment or disposal
(c) Generators must use approved TSDF's and Transporters with valid EPA ID numbers.
- **262.20- Manifest** *Compliance Yes/No
Manifests must be properly filled out for all hazardous waste shipments.
June 2014-present.

<u>TSD Facilities:</u>	
Facility Name	EPA ID #
<u>Giant Resource Recovery</u>	<u>SCD 036 275 626</u>
<u>Safety Kleen</u>	<u>NCD 077 840 148</u>
<u>Transporters:</u>	
Transporter Name	EPA ID #
<u>Garco</u>	<u>NCR 000 135 284</u>
<u>Safety Kleen</u>	<u>TXR 000 081 205</u>
<u>Eastern Environmental Management</u>	<u>NCR 000 146 456</u>

- **268.7 (a) (4) - LDR Certification** *Compliance Yes/No
Land Disposal Restrictions must accompany all waste streams sent to TSDF.
- **262.42- Exception Reports** *Compliance Yes/No
(a) (1) Facility must contact the transporter/designated facility if a manifest is not received within 35 days.
(2) Generator must submit an Exception Report if a manifest is not received within 45 days.
- **262.27 & GS 130A-294(k) Waste Minimization Certification** *Compliance Yes/No
A generator who ships hazardous waste must certify on their manifest a waste minimization program and have a written description of any program to minimize or reduce the volume and quantity or toxicity of waste.
Energizer maintains a Waste Minimization Plan on-site. It is reviewed quarterly, and reports sent to Corporate.
- **262.34(a) (1) (i) ref 265.174- Weekly Inspections** *Compliance Yes/No
Storage Areas must be inspected weekly for leaking containers and for deterioration of containers caused by corrosion.
- **15A NCAC 13A .0107(d) – Documented Weekly Inspections** *Compliance Yes/No
The generator must keep records of the inspections and results of the inspections for at least three years from the date of the inspection.
- **262.40- Recordkeeping** *Compliance Yes/No
 - a) Manifest must be kept for three years
 - b) Biennial Reports must be kept for three years. (does not apply to SGQ)
 - c) Waste analyses or test results must be kept for three years
 - d) If enforcement actions are taken these time periods are extended.

- (d) Emergency coordinators change
- (e) Emergency equipment changes

- **265.55- Emergency Coordinator**

***Compliance Yes/No**

An emergency coordinator should be on the premises or on call at all times. Must be able to respond in a short period of time. The coordinator must be familiar with all aspects of the contingency plan, operations, locations of haz-waste, record locations, and facility layout. Person must have the authority to commit resources needed to carry out contingency plan.

- **265.56- Emergency Procedures**

***Compliance Yes/No**

- a) During an emergency event the coordinator must immediately:

See regulations described at 40 CFR 265.56 if an event occurred causing the Contingency Plan to be implemented.

265.16- Personnel Training & Job Description

***Compliance Yes/No**

- a) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way to ensure compliance with these sections requirements.
 (2) Training must be conducted by a person trained in hazardous waste management procedures and training must include hazardous waste management training relevant to each employee's position (including contingency plan implementation).
 (3) Training should be designed to ensure that personnel can respond properly to emergencies.
- b) Personnel must complete the training within six months of their hire date or when they change job responsibilities.
- c) Personnel must take part in an annual review of the initial training.
- d) The following documents must be maintained at the facility:
 - (1) Job title and person filling position for each position related to hazardous waste management.
 - (2) A job description for each position listed above, including requisite skills, education, and qualifications. Position duties should also be recorded.
 - (3) A written description of the type and amount of initial and continuing training that will be given for each position.
 - (4) Records that document that the training or job experience has been completed by personnel.
- e) Training records on current personnel must be kept until closure of the facility. Training records on all former employees must be kept for at least three years from date of separation

The facility is operating as a SQG, and the following information was ascertained during the inspection. The facility is aware of the requirements of a LQG related to these training regulations, and has chosen to maintain the records to be in compliance with the more stringent regulations. The following information was reviewed during the inspection. Any blank areas should be reviewed by the facility and make sure the missing information is available if the facility operates as a LQG in the future. The facility is in compliance with the SQG training requirements.

Name of Employee	Job Title	Hazardous Waste Job Duties	Date of Annual RCRA Review	Date of Previous Annual RCRA Review	RCRA Job Description (including requisite skills, education and qualifications) Yes/No	Date of Contingency Plan Review
Scott Boyle	Staff Envir. Coord.	Emergency Coordinator	7/1/14	6/4/13	yes	Yes
David Chambers	Operator	HW Shipments	7/1/14	New	Yes	yes
Randy Harper	Sr. Logistics Assoc.	HW shipping	7/1/14	6/5/13	yes	yes
Julia Brown	Env. Assistant	Inspections	7/2/14	New	Yes	Yes

Additionally, salaried and hourly employees receive a review of major and minor spill response semi-annually. Management receives Emergency Response Procedures training annually. Emergency response Personnel receive spill response training semiannually.

Facility Walkthrough

- **262.30- Proper DOT Containers** *Compliance Yes/No
Waste must be packaged in accordance with applicable DOT regulations 49 CFR 173, 178, 179.
- **262.34 (a) - Accumulation Time** *Compliance Yes/No
A generator may accumulate hazardous waste on-site for 90 days or less without a permit.
- **262.34 (a) (1) (i) - Storage Container Spills/Releases** *Compliance Yes/No
Waste must be placed in containers.
- **262.34(a) (1) (i) ref 265.176- Waste Placement** *Compliance Yes/No
Ignitable or reactive waste must be stored at least 50 feet from the property line
- **262.34(a) (1) (i) ref 265.177- Incompatible Waste** *Compliance Yes/No
(a) Incompatible waste/materials must not be placed in the same container
(b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste
(c) Incompatible waste must be separated while in storage
- **262.34 (a) (2) - Accumulation Start Dates** *Compliance Yes/No
Containers in storage must be dated when accumulation begins.
- **262.34 (a) (3) - Storage Container Labeling** *Compliance Yes/No
Containers in storage area must be labeled “Hazardous Waste”.
- **262.34(c) (1) - Satellite Container Spills/Releases** *Compliance Yes/No
No more than 55-gallons may be placed in containers at or near the point of generation under the control of the operator. No spills of haz. waste on/around satellite accumulation containers.
- **262.34(c) (1) (i) ref 265.171- Container Condition** *Compliance Yes/No
Container in poor condition must be replaced.
- **262.34(c) (1) (i) ref 265.172- Container Compatibility** *Compliance Yes/No
Containers must be compatible with the waste they hold.
- **262.34(c) (1) (i) ref 265.173(a) - Container Management** *Compliance Yes/No
Containers must be maintained in a closed position unless adding or removing waste.
- **262.34(c) (1) (ii) - Satellite Container Labeling** *Compliance Yes/No
Satellite containers must be marked with the words “Hazardous Waste” or other words to describe the contents.
- **265.31- Maintenance and Operation of Facility** *Compliance Yes/No
Facility must be operated to minimize the possibility of a fire or any unplanned sudden or non-sudden release of hazardous waste that threatens health or environment.
- **265.32- Required Equipment** *Compliance Yes/No
Facilities must have the following equipment unless not needed.
(a) Internal communications or alarm system that provides emergency instruction to personnel. yes
(b) A telephone or two-way radio must be available at the scene of operation to summon emergency assistance. yes
(c) Fire extinguishers and fire control equipment spill control, and decontamination equipment. yes
(d) Adequate water volume and pressure to supply fire hoses, automatic sprinklers, or water spray systems. yes
- **265.34- Access to Communications** *Compliance Yes/No
(a) Whenever hazardous waste is being handled, all personnel involved must have access to an alarm or communication device. Visual or voice contact is allowed.
(b) If there is just one person at the facility, while in operation, they must have immediate access to a telephone or two-way radio capable of summoning emergency assistance.

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- **265.35- Required Aisle Space (15A NCAC 13A .0110 (c))** *Compliance Yes/No

Two feet of aisle space must be maintained to allow unobstructed movement of personnel or safety equipment.

Used Oil
(Generator)

- **279.22- Used Oil Storage** *Compliance Yes/No

- (a) Used oil must be stored in tanks or containers
- (b) Used oil containers must be in good condition and not leaking
- (c) (1) Used oil tanks and containers must be labeled with the words “Used Oil”. (2) Fill lines for used oil UST’s must be labeled with words “Used Oil”
- (d) When a used oil release is found the release must be:
 - (1) Stopped
 - (2) Contained
 - (3) Cleaned and managed properly
 - (4) Tanks or containers must be repaired before reuse.

2000 gallon AST, properly labeled “Used Oil”.

Universal Waste – Small Quantity Handler (Lamps & Batteries)

- **273.13 (a) - Used Battery Management** *Compliance Yes/No

All used batteries must be contained if damaged.

- **273.14 (a) - Used Battery Labeling** *Compliance Yes/No

Each battery/container of batteries must be labeled w/ the words “Universal Waste-Batteries”, “Waste Batteries”, or “Used Batteries”.

- **273.13 (d) - Used Lamp Management** *Compliance Yes/No

Used lamps must be properly containerized to prevent breakage and containers of lamps must be properly closed.

Energizer maintains a bulb crusher on-site. They conduct a TCLP for the waste and manage it as non-hazardous.

- **273.14 (e) - Used Lamp Labeling** *Compliance Yes/No

Each lamp or container of lamps must be labeled with the words “Universal Waste-Lamps”, “Waste Lamps”, or “Used Lamps”.

Twenty-two boxes properly closed and labeled.

- **273.15- Universal Waste Storage Time Limit** *Compliance Yes/No

Universal waste must be stored for longer than one year and must be able to demonstrate how long the waste has been onsite. (Time limit exemption is available if requirements at 273.15 (b) are met)

- **273.16- Universal Waste Training** *Compliance Yes/No

Universal waste handler must inform employees of proper handling and emergency procedures that are appropriate.

