

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: WILLIAM HUNNEKE - NC060
EPA ID: N C D 0 0 3 1 9 0 3 8 6
Facility Name: "*****"DuPont Kinston"Ukg
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Document Type: Compliance Evaluation Inspection (CEI)
Description: ANNUAL TSD INSPECTION REPORT
Date of Doc: 7/24/2013
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Hazardous Waste Compliance Data Entry Form

EPA ID Number: NCD003190386
Facility Name: DuPont Kinston Site

Street: 4693 Highway 11 North
City: Kinston
ZIP: 28502
County: Lenoir

Contact Name: Alex Torres
Phone#: 252-522-6782

EVALUATION DATA New: Change: Delete:

Date: **07/24/2013** Evaluation Type: **CEI**

Date: Evaluation Type:

Inspector ID #: **NC060** W. Hunneke

Evaluation Comments:

Annual TSD Compliance Evaluation Inspection. No violations.



COMPLIANCE INSPECTION REPORT

FACILITY INFORMATION:

Facility Name: **DuPont Kinston Site (E.I DuPont De Nemours & Co. – Kinston)**

EPA ID Number: **NCD 003 190 386**

Type of Facility: **TSD (operating as CESQG)**

Facility Location: **4693 Highway 11 North, Kinston NC 28502**

Mailing Address: **PO Box 800, Kinston NC 28501**

Telephone Number: **252-522-6782**

Property Owner: **E.I DuPont De Nemours & Co.**

Property Owner Address: **4693 Highway 11 North, Kinston NC 28502**

Legal Owner of Business: **E.I DuPont De Nemours & Co.**

FACILITY CONTACT: Alex Torres, Environmental Health & Safety Manager
Phone Number: 252-522-6782
Email Address: Alex.Torres@usa.dupont.com

PARTICIPANTS:

Representing DuPont: Alex Torres, Gerry Bailey
Kevin Garon, Sr. Project Director, DuPont Corp. Remediation
Mark Harder, Project Mgr. Parsons Corporation

Representing NCDENR: William Hunneke & Jenny Patterson

DATE OF SITE VISIT: **July 24, 2012** onsite: 09:00 offsite: 12:35

PURPOSE OF SITE VISIT:

Scheduled Compliance Evaluation Inspection to determine compliance with regulations described at 40 CFR 261, 262, 264, 265, 268, 273, and 279 and with the facility's permit. The last CEI was performed on July 25, 2012.

FACILITY DESCRIPTION:

The DuPont facility in Kinston, North Carolina is located on approximately 654 acres on NC Highway 11. The property is bounded by the Neuse River to the south and southeast, Highway 11 to the west and farmland to the north, northeast and southwest. There are a multitude of buildings at the site comprising a total of approximately sixty (60) acres under roof. The site has forty-six (46) monitoring and remediation wells and at least sixteen active solid waste management units (SWMUs). The site has air and storm water permits as well a permit governing the SWMUs. The distance to the nearest off-site well is unknown and the distance to the nearest residence is less than one-half mile. Water is provided to the plant by the Neuse Regional Water and Sewer Authority (NRWASA) and onsite production wells. The

facility operates its own permitted waste water treatment plant processing up to 500,000 gallons of waste water per day.

The site first became operational in 1953 as the world's first manufacturer of polyester. Dacron[®] fibers and resin were among the first products produced by the plant. In its heyday, the company employed over 4,000 individuals. Currently there are one-hundred and eighty employees (85 DuPonters & 35 contractors) working over three shifts. Current production at the plant is limited to the manufacture of a variety of pellets used to produce bio-based polyester with the trade name SARONA[®]. SARONA[®] Polyester production is accomplished using one of the following two chemical processes: dimethyl terephthalate (DMT) and propane diol, or terephthalic acid (TPA) and ethylene glycol. Water is produced as a by-product from the TPA process; methanol is a by-product of the DMT process. The methanol is sent back to the DMT manufacturer to be used "as is" in the manufacture of DMT. The waste water is sent to the facility's NPDES permitted, onsite waste water treatment plant. The company is not currently operating DMT based processes and is consequently not currently generating methanol by-products.

At one time, much of the wastes generated by plant operations were disposed of on-site in a series of pits, trenches and land-fills. These disposal units, which collectively are known as the South Disposal Area, are located between the manufacturing plant and the Neuse River. The units have been identified as Solid Waste Management Units (SWMUs) under the RCRA corrective action program. The facility currently operates under a Hazardous and Solid Waste Amendment only permit (HSWA-only permit). DuPont – Kinston's HSWA-only permit was determined complete in 2010. This permit lists seventy-seven (77) SWMUs and seven (7) Areas of Concern (AOC). The permit requires Confirmatory Sampling at three (3) SWMUs and RCRA Facility Investigation activities (RFI) at another eleven (11) RCRA units. In addition, the permit states that a Corrective Measures Study should be conducted at fifteen (15) SWMUs. DuPont uses a financial guarantee bond for corrective action only. The facility has been issued a HSWA Permit for the corrective action. The amount of the cost estimate for the corrective action for 2013 is \$2,443,200.00. The bond and cost estimate will be adjusted again on April 1, 2014.

The facility completed an upgrade to all wells that were viable on the site within the last year. The facility contracted The Parsons Corporation to perform a comprehensive twenty year history/overview of the site to identify data gaps and subsequently fill in the gaps and develop a conceptual site model with field work scheduled to commence in October 2013.

WASTE STREAMS INCLUDE:

The facility has notified as a Small Quantity Generator of hazardous waste (SQG) but is currently operating as a Conditionally Exempt Small Quantity Generator (CESQG).

Hazardous Waste Streams generated by the facility include:

- Toxic waste liquid – Methyl Chloride (F002, F003) generated by lab.
- Trichloroethene (TCE) (D040) from groundwater remediation.
- Waste aerosol cans (D001, D005, D006, D007, D008, D035, D039).
- Waste Paint (D001, D005, D006, D007).
- Hazardous waste solid – lead (D008).
- Mercury (D009) trace amounts.
- Ethyl Amine (D002) trace amounts.
- Ammonium Hydroxide (D002) trace amounts.
- Phosphoric Acid (D002) trace amounts.
- The facility also generates used (PCB containing) ballasts which are managed under the Toxic Substances Control Act (TSCA).

Other Waste Streams generated by the facility include:

- Toxic solids, organic – ethylene glycol (acrolein).
- Used oil
- Oil absorbent mix
- Monimer Solids, propane diol (PDO)
- Propylene Glycol
- Universal Waste – Used Lamps
- Corrosive Solids
- Universal Waste – Used Batteries (alkaline and gel cell)

AREAS OF REVIEW AND INSPECTION:

Manifests and Land Disposal Restriction documents were reviewed for the year 2012 through the present and found to be complete and in compliance.

Transporters:

- | | |
|--|--------------|
| • Veolia Technical Solutions LLC | NJD080631369 |
| • Clean Harbors Environmental Services | MAD039322250 |
| • Bed Rock Inc. BDA TSMT Co. | MOD095038998 |
| • Safety Kleen Systems | TXR000081205 |
| • Robbie D. Wood, Inc. | ALD067138891 |

Treatment Storage & Disposal (TSD) facilities:

- | | |
|------------------------------|-----------------|
| • Safety Kleen Systems | ILD980613913 |
| • Clean Harbors Chattanooga | TND982141392 |
| • Safety Kleen Systems, Inc. | KYD 053 348 108 |

Storage Areas, Inspection Records & Emergency Preparedness:

The less than 180-day hazardous waste storage area (storage area) is located inside the main building and is surrounded by a locked chain link security fence. Waste is logged in at the storage area at a log and safety station immediately in front of the security fence. Bold signage posting emergency response and preparedness information at the log and safety station satisfies the emergency response requirements for a small quantity generator. Cell phones and radios are used for communication; an alarm and spill kit was observed at the storage area. Weekly inspection records for the storage area were reviewed from June 2012 through the present and found to complete and in compliance. Included in the weekly inspection checklist are checks to ensure that containers are in good condition and not leaking, containers are properly closed, labeled and dated. One 5-gallon plastic jug of TCE generated by groundwater remediation activities was observed in the storage area. It was properly closed, labeled and dated. Universal waste is also accumulated at the storage area. Used batteries are segregated by type and stored in closed plastic pails. Used PCB containing ballasts are stored in a closed 30-gallon drum. Used bulbs are stored in boxes for tubular bulbs and a drum for screw-based fluorescents.

Accumulation Areas:

Only one satellite accumulation area was visited. Inspectors were informed that it is the only satellite area at the facility. Located in what is referred to at the Carbon Black Building, one 55-gallon drum of mixed lab waste containing methylene chloride/phenol/TCE/methanol & acetone was observed. The drum was observed to be properly closed, labeled and dated. The waste is generated from the lab and hard piped into the drum. There was discussion that the facility was considering moving the satellite accumulation area closer to the lab in the future. The area was observed to have a fire extinguisher, spill kit and safety

shower. All personnel accessing the area carry two-way radios. The chemistry lab was also visited, no hazardous waste was observed.

Solid Waste Management Units:

A tour of some of the facility's South Disposal Area, SWMUs, waste water treatment plant and other areas of concern was conducted by motor van. Areas visited on the day of the inspection included:

- TCE Area
- HazPad
- Coal Pile
- SWMU 9
- SWMU 7
- Ash Landfill (SWMU 10) and adjacent C & D landfill
- SWMU 30 (old incinerator)
- Waste Water Treatment Plant
- Wetlands adjacent to the Neuse River (SWMU 12, monitoring wells 20A & 20B)
- SWMU 3 finish oil pits
- Spray Fields

Mercury:

The facility has approximately six to ten old, closed tube manometers from which it intends to send the mercury off for retort, assuming the mercury is pure enough. To be scheduled.

Closed Drum Storage Area:

The concrete pad is all that remains of the covered area formerly used to store hazardous waste. This area was officially and properly clean closed subsequent to the construction of an alternate less than 90-day hazardous waste storage area after 2004.

Training Records:

Since the facility is operating as a CESQG, no training records were reviewed.

Condition of Facility:

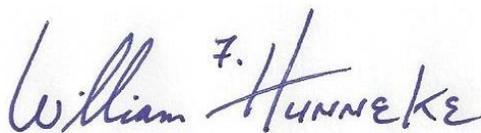
The condition of the facility was very good inside and out. No adverse conditions were observed.

WASTE MINIMIZATION:

The facility makes every attempt to recycle or reuse any waste that is generated during its routine operations. The company is not currently operating DMT based processes and is consequently not currently generating methanol by-products.

SITE DEFICIENCIES / RECOMENDATIONS:

No site deficiencies were observed and no recommendations offered as a result of this inspection.



William Hunneke
Environmental Senior Specialist, NCDENR

October 21, 2013

Date