

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

Your Name: Ernest Lawrence

Facility ID Number: NCD079047148

Facility Name: RPM Wood Finishes Group Inc

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

Description for File (for CARA): No violations

Date of Document: 3/16/2015

Author(s) of Document: Ernest Lawrence

Inspector ID #: NC043

Suborganization: Western Region

Comments for RCRAInfo:No violations

County (if not on report): Caldwell

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

Pat McCrory
Governor

Donald R van der Vaart
Secretary

RCRA INSPECTION REPORT

Facility Information

RPM Wood Finishes Group Inc
3194 Hickory Blvd, Hudson, N.C. 28638
P.O. Box 22000, Hickory, NC 28603-0200

EPA ID#: NCD079047148

Contact/Title: Kirk Weil- EHS Manager 828/728-8266 ext 1819

Inspection Date: 3/16/15

Last Inspection: 1/29/13

Status: LQG

Type of Inspection: CEI

Inspector(s): Ernest Lawrence

Present at Inspection: Kirk Weil, Ernest Lawrence.

Type of Business: RPM Wood Finishes Group is a manufacturer of industrial coatings (finishes, stains, lacquers), and ink markers. The industrial coatings are used primarily in the furniture industry. Hazardous wastes are generated at the facility from the general clean up of batch manufacturing operations, distillation of spent acetone, and from off-spec/out of date products. The facility has approximately 285 employees. The facility is connected to city water and sewer. The distance to the closest private residence is approximately 500 feet.

Wastes Generated: F003/F005/D001 waste solids containing flammable liquid (xylene); D001 waste paint related material; D001 waste resin solution; D001/D035/F003/F005 waste flammable liquid (acetone, toluene, MEK, naphtha, MIBK, methanol); D002/U188 waste corrosive liquid. D001, D002, F003 – Waste flammable liquid Non-hazardous wastes include waste water based coatings and Optol.

Manifests: Approved Transporters? Yes Approved TSDF? Yes
Filled Out Correctly? Yes Signed Copies? Yes
LDR Notification Attached? Yes

Transporters: Sumter Transport- SCD987584778
Univar – GAD990945077

Dupre – LAR000045963

TSDF's: Geocycle, LLC - SCD003368891
Tradebee – TND000772186
Giant Resources – SCD036275626
Heritage WTI – OHD980613541

Waste Minimization: The facility maintains a written waste minimization plan. Inventory control and distillation of acetone waste are a few of the efforts made by the facility to reduce hazardous waste.

Inspection Records:

Evidence that inspections are conducted? Yes

Inspections on Storage Areas? Yes

Inspections on H.W. Tanks? N/A

Inspections on Ancillary Equipment? N/A

Contingency Plan:

On-Site? Yes

Any changes to facility/processes or Emergency Coordinator since last review? No

Contingency Plan Implemented? No

Agreements with Emergency Responders? Yes. The facility has agreements with Hudson Fire Dept., North Catawba Fire Dept., Sawmills Fire Dept., Caldwell Memorial Hospital, Caldwell County EMS, and Hudson Police Dept.

Training Records:

Certified Training Documents Available? Yes; job titles and descriptions are maintained for employees handling hazardous waste.

New Employees Since Last Inspection? No.

Evidence of Improper/Inadequate Training? No; Documentation provided by the facility indicated that training was being conducted annually.

Biennial Report: On-site and available for review.

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Yes

Internal Communications or Alarm Present? Yes; the facility maintains an alarm (bell, pulsating siren), and telephones for communication.

Portable Fire Extinguishers and/or Fire Control Equipment? Yes; the facility maintains fire extinguishers, and a sprinkler system for fire suppression.

Spill Control Equipment? Yes; the facility uses absorbent and shovels for spill control.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? Yes; Unifour Fire and Safety is contracted to do checks on extinguishers and K&S checks the sprinkler system.

All Equipment/Alarms Tested and Maintained? Yes. The facility conducts alarm tests and evacuation drills.

All Personnel Handling HW have Access to Alarm/Device? Yes; The facility maintains a telephone in the <90-day storage area.

Adequate Aisle Space in Areas of Facility Operation? Yes.

Satellite Accumulation Area(s)

The facility maintains several areas for the accumulation of hazardous waste. A 55-gallon container is located in the following areas: Batch Making, Color Lab, Varsol Wash, Aerosol Line, Drain Wash, Pour Up Container, Marker Pen, Pail Wash, Can Crusher, and Acetone Wash (Fill Off).

Closed? Yes

Labeled/Contents Identified? Yes

< 55 Gallons? Yes

Releases? No

Storage Area(s)

Containers are stored on pallets which are placed on a three level rack. A telephone is located in the area. Spill control equipment, sprinklers and a fire extinguisher are located in the area. At the time of the inspection there were approximately one hundred 55-gallon containers in storage. The containers were labeled, dated, and closed. The starting accumulation date was 2/12/15. No releases were observed in the area or on the containers.

The facility also maintains a 7000 gallon container on the northeast corner of the north end of the plant. The container is referred to as the KilnDirect container. Drums storing waste in the main storage area are poured into the KilnDirect container for storage. The KilnDirect container was labeled, dated (1/25/13), and closed. No releases were observed on the container or in the area. A Level II annual container inspection is conducted per the Subpart CC regulations.

HW Tank:

Description of Unit: N/A

Other HW Units:

Description of Unit(s): The facility maintains an area in the maintenance area where universal waste lamps are stored. Two boxes of used lamps were observed during the inspection. They were closed, labeled, and had a starting accumulation date of 10/3/12.

No used oil was observed during the inspection.

In Compliance

No violations were observed.

	3/16/15	Copy sent to facility
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RCRA Inspector	Date	Facility Contact