

Hazardous Waste Section  
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Facility Name: Shurtape Technologies, Inc. - Plant 31  
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NORTH CAROLINA DEPARTMENT OF ENVIRONMENT & NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH

**RCRA INSPECTION REPORT**

1. **Facility Information:** Shurtape Technologies, LLC – Plant #33  
8510 Highway 90 East  
Stoney Point, NC 28678  
**NCD 986 166 031, LQG**  
  
P.O. Box 1530  
Hickory, NC 28603
2. **Facility Contact:** Mr. Mark Hawes, Shurtape-Director Environmental & Safety  
828.267.8428
3. **Inspector:** Mr. Sean Morris, HWS-Environmental Senior Specialist
4. **Survey Participants:** Mr. Mark Hawes, Shurtape-Director Environmental & Safety  
Mr. Jerry Eplin, Shurtape-Environmental & Process Engineer  
Mr. Bill Pinkham, Shurtape-EHS Technician  
Mr. Travis Brandon, Shurtape-EHS Dept.
5. **Date/Time of Inspection:** March 6, 2014 Arrived: 10:40am Departed: 2:12pm  
  
**Date of Report:** April 4, 2014 – Prepared By: Sean Morris
6. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279
7. **Facility Description:**

On March 6, 2014 I conducted an unannounced compliance inspection at Shurtape Technologies, LLC Plant #33 located in Hickory, NC. Shurtape Plant #31 primarily operates as a manufacturer of pressure sensitive adhesive Duct brand tape. The manufacturing plant was first constructed in 1928 for use as a textile yarn production plant, operated by Shuford Mills. The site name was changed to Shurtape in the early 1970s and converted for Duct tape manufacturing. Shurtape owns eight adjoining land parcels in the area that total ~11.65 acres. The main production building is located on ~4.25 acre tract and is ~300,000 square feet in size. The manufacturing plant currently has approximately 150-employees, which operate on three primary shifts, five days a week. The facility is positioned approximately 500-feet from residential areas, located to the southwest & northeast of the plant. There are no known water supply wells onsite but there are groundwater monitoring wells onsite. The facility is connected to municipal POTW for water and sewer services. The facility operates a wastewater pretreatment (WWT) system for non-industrial wastewater. WWT sludge has been determined to be non-hazardous waste and is disposed as solid waste.

The facility manufacturers solvent based adhesives and apply the adhesives to cloth or poly-based backings. The facility also conducts cutting & packaging of finished tape for retail sale. The facility primarily generates hazardous waste from process equipment cleaning using isopropyl alcohol cleaning solvent blends. Some product materials used in manufacturing, and subsequently disposed, can include chromium. The facility also generates hazardous waste from QA laboratory operations, aerosol can liquids, universal waste lamps & batteries and used oil. The facility maintains one part washer, which generates non-hazardous waste when serviced.

The facility generates spent solvent wipes, which are collected for laundering by Coyne Textile based in Virginia. Shurtape manages spent solvent wipes under EPA's modified solvent-contaminated wipe regulations, which allows for the conditional exclusion of spent solvent wipes from RCRA regulations. NC adopted and implemented the conditional wipe exclusion on February 1, 2014.

Based on the facility's hazardous waste manifests, the facility currently generates approximately (6-8) 55-gallon containers of hazardous waste every other calendar month. The facility is currently listed as a LQG and was operating as a SQG at the time of the inspection. The facility maintains compliance with LQG regulations and both LQG & SQG requirements were reviewed during the inspection.

**8. Waste Type:**

- D001/F003/F005, waste solids containing flammable liquid (toluene, acetone)
- D001/D007, waste flammable liquids (IPA, chromium)
- D001, waste flammable liquid (toluene)
- D007, waste solids containing flammable liquids (IPA, chromium)

**9. Areas of Inspection:**

Manifests:

Hazardous waste manifests were reviewed for the past couple years. The manifests reviewed documented approved transporters and TSD facilities. Land Disposal Restriction forms were available for each hazardous waste stream.

Transporters: STAT, Inc. – NCD780 799 422  
Robbie D. Wood – ALD 067 138 891

TSDs: Rineco – ARD 981 057 870

Waste Minimization:

The facility maintains a written waste minimization plan. The plan was dated January 2010 and was reviewed at the time of the inspection. The facility's plan listed waste minimization goals and waste reduction technologies (See Comment Section).

Weekly Inspections:

The facility conducts and documents weekly inspections at the facility's hazardous waste container storage area. The inspection log was found to be up to date at the time of the inspection.

Emergency Preparedness:

The facility is equipped with a P/A system, fire alarm pull stations, security system, various type fire extinguishers, a mobile spill response cart and spill kits. The facility is also equipped with a sprinkler system, which is supplied by municipal water, and includes one 50,000-gallon above ground storage tank. Facility personnel participate in emergency response and evacuation drills and also has a designated emergency response team, capable of responding to emergencies using Level C PPE. Facility personnel conduct monthly emergency equipment inspections and contracts annual fire extinguisher and sprinkler system inspections. The facility has attempted to secure emergency arrangements with local authorities by hand delivery of arrangement request letters, to the local hospital, police & fire departments, Alexander County Emergency Management and contracted emergency environmental contractors, on June 10, 2013. The facility's primary emergency coordinator is currently listed as Mr. Mark Hawes. The facility was found to be managing hazardous waste to minimize the possibility of a release or fire.

Training:

The facility maintains a LQG hazardous waste training program for employees that handle or manage hazardous waste. The training program includes contingency plan procedure review, waste identification, container management requirements, emergency response procedures, the use of manifests, shipping procedures and evacuation procedures. Mr. Mark Hawes & Mr. Jerry Eplin attended the 2013 NC HWS LQG Workshop. The facility also presents DOT training and emergency response team training courses. Hazardous waste job titles and descriptions were documented for employees responsible for handling/managing hazardous waste. Mr. Jerry Eplin presents initial and annual training to employees. Hazardous waste training course completion records are properly maintained and records indicated that training was last presented employees in October 2013.

Biennial Report:

The facility's 2013 Biennial Report was submitted on February 25, 2014. The report was available for review at the time of the inspection and the report documented the facility generated approximately 10,000-pounds of hazardous waste in 2013.

Contingency Plan:

The facility maintains an Emergency Response Plan onsite, with the RCRA contingency plan listed as "Section 4" within the plan. The plan was last revised in June 2013 and the revised plan was also hand delivered to the local hospital, police & fire departments, Catawba County Emergency Management, Zebra Environmental and STAT, Inc. on June 10, 2013. The plan lists Mr. Mark Hawes as the facility's primary RCRA emergency coordinator and Mr. Jerry Eplin was listed as the alternate emergency coordinator. The plan includes the coordinator name and home address. The plan included all required LQG contingency plan elements. The plan also included a revision section, which listed the dates and reasons for past plan revisions. The facility's emergency environmental contractors are Zebra Environmental and STAT, Inc. It was recommended that a SQG contingency plan be posted in the hazardous waste storage area and hazardous waste accumulation areas, where phones are available (See Comment Section).

Accumulation Areas:

The facility maintains several satellite accumulation areas (SAAs) throughout the facility. Each SAA is designated with placarding, which also include visual aids to assist with maintain compliance with container management regulations. The following satellite accumulation areas were visited at the time of the inspection:

1. Slitting Area – There was one 55-gallon container of hazardous waste aerosol liquids in this area. The container was properly labeled and closed at the time of the inspection. There was also one 55-gallon container of excluded solvent wipes in the area, which was also properly closed and labeled.
2. Calendar 22 Area – There was one 55-gallon container of hazardous waste aerosol liquids in this area. The container was properly labeled and closed at the time of the inspection.
3. Calendar 21 Area – There was one 55-gallon container of hazardous waste in this area. The container was equipped with a funnel and metal grate, for drainage of waste liquids from a wix felt type material, into the container. The container was properly labeled and closed at the time of the inspection.
4. QA Lab Area - There was one 55-gallon container of D001/F003/F005 hazardous waste in this area. The container was equipped with a funnel and spring operated lid. The container was properly labeled and closed at the time of the inspection.

5. Mop Head Area - There was also one 55-gallon container of excluded solvent wipes in the area. The container is equipped with a funnel, which was latched during the inspection. The container was properly labeled.

Hazardous Waste Storage Areas:

The facility maintains the following hazardous waste storage area:

1. Basement Cage Hazardous Waste Storage Area – The storage area is located in the basement portion of the plant and consists of a woven wire cage to restrict entry. There were three 55-gallon containers of hazardous waste in the storage area and the containers were properly closed, labeled and marked with an accumulation start date. The area is in close proximity with spill control supplies and there is a phone, pull station & emergency alarm button in the area, which are used as emergency communication devices. Secondary spill containment pallets are utilized. The cage area remains locked and only RCRA trained personnel have access to the area. It was recommended that a fire extinguisher be placed within the cage (See Comment Section).

Used Oil and Universal Waste:

The facility generates universal waste lamps and batteries. Universal waste is stored in the Core Storage Area and there were six containers of used lamps, four containers of used batteries and one container of used mercury containing devices in storage. All containers were properly labeled and closed at the time of the inspection. Universal waste is managed by Southeast Recycling Technologies, Inc. based in Johnson City, TN and the last documented collection date for universal waste was on December 30, 2013.

The facility generates used oil from general machinery maintenance. There were two 250-gallon totes and one 5-gallon container of used oil being accumulated in the Basement Cage Hazardous Waste Storage Area at the time of the inspection. All of the containers were properly labeled with the words "Used Oil" and were closed at the time of the inspection. Used oil is collected for recycling by VLS Recovery based in Mauldin, SC or Necessary Oil, based in Bristol, TN. Collection receipts are maintained and the last documented collection date by Necessary Oil was on February 6, 2013.

**10. Comments:**

- It is recommended that a fire extinguisher be placed within the cage area of the facility's hazardous waste storage area.
- It is strongly recommended that a SQG contingency plan be posted in the hazardous waste storage area and hazardous waste accumulation areas, where phones are available.
- It is recommended that a description of hand delivery of emergency arrangement letters, be added to the emergency arrangement section of the facility's contingency plan. It is recommended that the facility's RCRA job descriptions match new job descriptions that have been developed. It is also recommended that a copy of employee universal waste training records remain onsite and available for review.

**11. Site Deficiencies:**

No deficiencies were cited during the inspection.

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**J. SEAN MORRIS, / DATE  
NC HWS-COMPLIANCE BRANCH**

**SENT BY US MAIL  
FACILITY CONTACT**

cc:  
MRO Files  
Brent Burch, Western Area Compliance Supervisor  
Central Office Files  
Mark Hawes, Shurtape Technologies, LLC