

Hazardous Waste Section

File Room Document Transmittal Sheet

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Your Name: Bradley Bailey  
EPA ID: N C D 0 0 3 2 3 3 9 7 0  
Facility Name: THOMAS BUILT BUSES INC  
Document Group: Inspection/Investigation (I)  
Document Type: Compliance Evaluation Inspection (CEI)  
Description: FY 2013  
Date of Doc: 7/25/2013  
Author of Doc: Bradley Bailey

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**Hazardous Waste Compliance Data Entry Form**

**EPA ID Number:** NCD 003 233 970

**Facility Name:** THOMAS BUILT BUSES, INC

1408 Courtesy Road  
High Point, NC 27260

**County:** Guilford

**Contact Name:** Alice Rimmer

**Phone#:** (336) 471-2186

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**EVALUATION DATA:**      **New: XXX**      Change: \_\_\_\_      Delete: \_\_\_\_

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**Date:** 07/25/13

**Evaluation Type:** CEI

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Evaluation Type: \_\_\_\_\_

Inspector ID #: 021

**Evaluation Comments:**

\_\_\_\_\_

**No violations cited.**

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**STATE OF NORTH CAROLINA  
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION**

**COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

**1. FACILITY INFORMATION:**

Facility Name: Thomas Built Buses, Inc. (Courtesy Road)  
EPA ID Number: NCD 003 233 970  
Type of Facility: Large Quantity Generator  
Facility Location: 1408 Courtesy Road, High Point, NC 27260  
Mailing Address: P.O. Box 2450, High Point, NC 27261  
Telephone Number: 336.881.6025

**2. FACILITY CONTACT:** Alice Wesselman-Rimmer-Environmental Manager, Thomas Built Buses  
[alice.rimmer@daimler.com](mailto:alice.rimmer@daimler.com) 336.471.2186

**3. INSPECTION PARTICIPANTS:** Richard Curry - Environmental Technician (Thomas Built Buses), and Bradley Bailey (NCDENR).

**4. DATE OF INSPECTION:** July 25, 2013

**5. PURPOSE OF INSPECTION:** Audit to determine compliance with regulation described at 40 CFR 261, 262, 265, 268, 273 and 279. This facility was last inspected on June 15, 2012.

**6. FACILITY DESCRIPTION:**

This facility has been in operation since 1916 when they manufactured trolley cars. In 1936, the facility shifted to manufacturing buses. The company owned by the Thomas family was purchased by Freightliner, LLC, now known as Daimler Trucks of North America LLC in 1998. The Courtesy Road location is the company's major assembly site for these buses. This facility is made up of Plants 1,4,5,6, and 7. Plants 1 and 4 are separated from 5, 6, and 7, but they are all on contiguous property divided only by a public right-of-way. The facility is made up of four main manufacturing buildings with 600,000 square feet of building space and on approximately 45 acres of land. Thomas Built employs approximately 1400 employees and operate two (2) shifts five days per week. The facility is on City of High Point water and sewer with the closest residence within ¼ mile. Business and property owner are listed as Thomas Built Buses Inc. There are 7 monitoring wells around the property that were installed in 1996.

Thomas Built Buses located at Courtesy Road manufactures flat nose (type D) and Minotour school buses as well as transit buses. The facility consists of the following areas:

- a) Fabrication area: Sheet metal is received, stored and fabricated into parts for buses. Hazardous waste is not generated in this area, but used oil is generated from the metal fabrication equipment.
- b) Metal pretreatment area (zinc phosphate): Metal parts are treated prior to painting in a six-stage zinc phosphate line consisting of the following: an alkaline wash, two rinses, a zinc phosphate wash, one rinse, and a chrome sealant dip. Hazardous waste used to be generated from cleaning the secondary containment for the phosphate line, but the facility sampled this

- material and determined it to not actually be a hazardous waste. The wastewater generated from the zinc phosphate line is treated in the on-site wastewater treatment unit.
- c) Metal pretreatment area (iron phosphate): Metal parts for seat railings are treated in the five-stage iron phosphate cleaning system prior to powder paint coating. Hazardous waste is generated in this area from the material cleaned up from around the phosphate line and from the wastewater treatment sludge generated from the sludge press.
  - d) Paint Prep Area: Consists of a two-part acrylic adhesive/activator mixing system using an adhesive that when activated becomes non-hazardous. The caulk is used on the interior, the headliner, and the windows of the buses. Hazardous waste is generated from the adhesive product container liners. The facility determined that the waste mixed adhesive itself is not a hazardous waste. The waste mixed adhesive had been managed as a hazardous waste for the period of time that the mixed adhesive was a liquid because it may be ignitable. The facility has since performed a paint filter test and determined that the mixed adhesive does not meet the definition of a liquid. As a solid, the waste mixed adhesive is not capable of “causing fire through friction, absorption of moisture or spontaneous chemical changes and when ignited, burns so vigorously and persistently that it creates a hazard”. Therefore, this material is not subject to 40 CFR 261.21.
  - e) Paint Area: Buses are cleaned with naphtha prior to painting. The rags contaminated with solvent are laundered. Paper is placed over the windows and other surfaces that do not require painting. The facility has two electrostatic paint booths where interior and exterior painting of the buses occurs simultaneously. Paint related waste is generated from purging the lines on the spray guns. A waste analysis has been performed on the paper used to cover surfaces that do not need painting and the paint booth filters and they have been determined to be non-hazardous materials.

**7. WASTE STREAMS INCLUDE:** Hazardous waste generated at the Courtesy Road facility includes:

UN1133 – Waste Adhesives (two-part epoxy), [D001]

NA3077 – Hazardous Waste Solid, (waste water sludge, Chrome, Zinc, Phosphate) [F019]

UN1325 – Waste flammable solid (waste paint, purge solvent, rags), [D001,D005,D007,F003,F005]

UN1263 – Waste Paint Related Mat'l [D001, D035, F003, F005]

Universal waste lamps are sent to IBS and batteries are recycled through Synergy. Used oil is recycled through Giant Resource Recovery. The facility generates lead acid batteries that are reclaimed by Industrial Battery and Charger. Scrap metal from punctured aerosol cans is sent to OmniSource. Wastewater from the on-site treatment unit is discharged to the City of High Point. Paper and paint booth filters are disposed of as non-hazardous waste. Oily rags are laundered by Aramark. Other rags (other than oily rags) are sent off site to Total Recycling Services for laundering. Computer equipment is sent off site for recycling. Other non-hazardous waste generated at this facility include: used antifreeze, used adhesive, black sealant paste, non-flammable aerosols, zinc and iron phosphate sludge and calcium chloride solution.

## 8. AREAS OF REVIEW AND INSPECTION:

- **Emergency Preparedness:** The facility is operated and maintained to minimize the possibility of fire or any unplanned sudden or non-sudden release of hazardous waste that could threaten health or the environment. The facility has an internal alarm that provides emergency instruction to personnel in the event of an emergency and facility personnel who handle hazardous waste in the storage areas have access to a telephone to summon emergency assistance if necessary. The facility has fire extinguishers and spill control equipment available near the hazardous waste storage areas. The emergency equipment is tested and maintained. Sprinklers are inspected annually. The alarm system is tested during evacuation drills which are conducted at least annually. Fire extinguishers and spill kits are inspected monthly. The facility maintains twenty four inches of aisle space in the hazardous waste storage areas. Arrangements have been made with the local emergency authorities to familiarize them with the facility and the hazardous waste handled at the facility. A copy of the facility's contingency plan was mailed to the local emergency authorities on August 30, 2012. The facility's contingency plan was updated August 6, 2012 on E-Plan so local emergency response authorities can view the plan if necessary.
- **Contingency Plan:** The facility maintains a contingency plan on site that was last updated on August 6, 2012. The plan describes the actions personnel must take to respond to an emergency. The plan also includes the following: a list of emergency coordinators with their home and work addresses and phone numbers; a description of the arrangements made with the local emergency authorities; a description of the signal used to begin evacuation of the facility; a physical description of the emergency equipment used at the less than 90 day storage area in the event of an emergency with the location of the equipment and a brief description of the capabilities of the equipment; and a description of the evacuation routes from the less than 90 day storage area. The contingency plan has been distributed, as required, and the facility maintains the certified mail return receipt to indicate that the plan was received by the local emergency authorities.
- **Inspection Records (storage):** Inspections of the facility's three less than 90 day storage areas are performed on a weekly basis and logged on an inspection form. The inspection form also documents review of the following: labeling, aisle space, and container closure.
- **Manifests / LDR:** Manifests were reviewed for 2012 and 2013 and were found in good order complete with signed copies and land disposal restriction forms. The facility utilizes the following hazardous waste transporters and disposal companies:
  - Transporters: Freehold Cartage - NJD 054 126 164
  - TSD's: Giant Resource Recovery - SCD 036 275 626
- **Training Records:** Approximately 100 employees receive RCRA training. RCRA training is usually conducted twice a year to incorporate new employees with hazardous waste management duties. All material handlers at this facility receive annual RCRA training (May 20 & 23, 2013). Maintenance department personnel receive spill response training. Personnel who act as emergency coordinators review the contingency plan (December 5-7, 2012 and January 21-22, 2013). Key hazardous waste personnel attended the Hazardous Waste Section, Large Quantity Generator workshop on April 18, 2013. The facility maintains job titles and descriptions for personnel with hazardous waste management duties.

- **Biennial Report:** The Biennial Report was submitted February 16, 2012. A copy of the biennial report is maintained on site.
- **Waste Minimization:** The facility employs the following waste minimization efforts: utilization of new equipment to mix paint and activator more effectively and efficiently, reduced chemical usage by decreasing the length of the purge lines on the spray booth guns, laundering rags, and product substitution, when possible.
- **Accumulation Areas:** The following satellite accumulation areas were evaluated during the inspection:
  - a) **Minotour Plexus Adhesive Liners:** This satellite area is located next to the two part acrylic adhesive/activator mixing system which uses ITW Plexus methyl methacrylate (MMA). This adhesive becomes non-hazardous once it is mixed with the activator. The MMA arrives in drums lined with plastic and the liners with unused MMA (U162) are stored in one 55-gallon container next to the mixing unit. This container was observed in compliance. [D001]
  - b) **Minotour Aerosols:** One 55-gallon container is used for the accumulation of waste aerosol containers. This container was observed in compliance. [D001]
  - c) **Paint Kitchen:** One 55-gallon container used for the accumulation of waste paint generated from the Paint Kitchen. One 55-gallon container used for the accumulation of waste generated from puncturing aerosol containers. These containers are considered separate satellite accumulation containers and were both observed in compliance. [D001/D007/D035/F003/F005]
  - d) **Minotour Yellow Line:** Two 55-gallon containers with funnels are used for the accumulation of waste paint related material (D001/D007/D035/F003/F005). The two containers are on separate sides of the paint booth and are considered separate satellite accumulation containers. Both containers were observed in compliance. [D001/D007/D035/F003/F005]
  - e) **Minotour Black Rail/White Roof:** One 55-gallon container with funnel is used for the accumulation waste paint related material. This container was observed in compliance. [D001/D007/D035/F003/F005]
  - f) **D-Body Yellow Booth, Black Rails/White Roof:** Two 55-gallon containers for waste paint related materials. The two containers are on separate sides of the paint booth and are separate accumulation containers. The containers were observed in compliance. [D001/D007/D035/F003/F005]
  - g) **D-Body Plexus Adhesive Liners:** One 55-gallon container used to accumulate the plastic liners with the unused MMA. This container was observed in compliance. [D001]
  - h) **Plexus Adhesive Liners (Near Roof Sheet):** One 55-gallon container used to accumulate the plastic liners with the unused MMA. This container was observed in compliance. [D001]
  - i) **Wastewater Treatment Filter Press:** Located near the on-site wastewater treatment unit, is a metal bin used to collect wastewater sludge (F019) from the filter press. After each use, the sludge from the bin under the filter press is transferred into a roll off box located outside. This container was observed in compliance.

- j) Rivet Area: One 55-gallon container with funnel for the accumulation of used clean-up solvent for rivet dip. This container was observed in compliance. [D001/D007/D035/F003/F005]
- k) Plant 5 – Chassis Shop: Plant 5 is located across Courtesy Road, but is on contiguous property. On the day of the inspection, one 55-gallon container used for the accumulation of waste generated from puncturing aerosol containers was observed in this building. This container was observed in compliance. [D001/D007/D035/F003/F005] One fifty-five gallon container for the accumulation of Used Oil and one for Used Anti-freeze, both closed and properly labeled.
- l) Duke Building (Universal Waste Storage): One 55-gallon container used for the accumulation of broken lamps. This container was observed labeled and closed. [D009]

Used Oil is accumulated at several points in the facility including the Compressor Room, the Forklift Shop, Plant 4, Fabrication Stretch Press, Plant 5 Fabrication, Steel Mill Department and Chassis Shop. All used oil containers were observed in compliance.

**Storage Areas:**

- a) Inside less than 90 Day Hazardous Waste Storage Area: The facility has one less than 90 day storage area located inside the facility located near the wastewater treatment end of the prime line. On the day of the inspection, there was one drum [D001] dated 7-23-13 and two drums [D001/D007/D035/F003/F005] observed in the storage area (dated 7-22-13 & 7-23-13).
  - b) Wastewater Treatment Sludge less than 90 Day Storage Area: This storage area is located in a parking lot (Lot #12) next to the manufacturing building. A 30 cubic yard roll-off box is used for the wastewater treatment sludge (F019) waste from the on-site wastewater treatment unit. The roll-off box was observed in compliance.
  - c) Outside less than 90 Day Storage Area: This storage area is located in Lot #3 and consists of a structure that is covered, fenced, and locked. The building has a bermed concrete floor. A phone and spill control equipment was located in the storage area. The 10 drums in the storage area were observed in compliance and the storage area met all requirements.
  - d) Universal Waste Storage Area: This storage area is located in the Duke Building across the street from the main manufacturing building. Universal waste lamps and batteries are stored in this building. All universal waste containers (2 boxes) were labeled and closed and observed in compliance (oldest date 6/4/13). The facility also stores some computer equipment that is destined to be recycled in this building. Synergy manages the facility's universal waste and computer equipment. Also stored in this building are some lead acid batteries.
9. **SITE DEFICIENCIES:** There were no violations noted during the Compliance Evaluation Inspection conducted on July 25, 2013.
10. **RECOMENDATIONS:** There are no recommendations offered as part of the Compliance Evaluation Inspection conducted on July 25, 2013.

*Bradley Bailey*

Date: 9 AUG 2013

Bradley Bailey  
Environmental Senior Specialist, NCDENR