

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Jenne Walker
EPA ID: NCD067203752
Facility Name: Schneider Electric (Square D site)
Document Group: Inspection/Investigation (I)
Document Type: Compliance Evaluation Inspection (CEI)
Description: Permitted (GW monitoring) TSD CEI- no violations
Date of Doc: 9/26/2011
Author of Doc: Jenne Walker

File Room Use Only

NCD067203752

Date Recieved by File Room:

Month	Day	Year

Scanner's Initials:

Date Scanned:

File Room Document Transmittal Sheet

Your Name: Jenne Walker
 EPA ID: N C D 0 6 7 2 0 3 7 5 2
 Facility Name: ^{former} Square D site, Schneider Electric
 Document Group: Inspection/Investigation (I)
 Document Type: Compliance Evaluation Inspection (CEI)
 Description: Permitted (GW monitoring) TSD CEI - no violations
 Date of Doc: 9/26/2011
 Author of Doc: Jenne Walker *JW*

*Factsheet
not scanned*

File Room Use Only

Date Recieved by File Room:

Date Scanned:

Month	Day	Year
11	22	11
11	22	11

Scanner's Initials: *RMP*

Emergency Preparedness – Emergency information was posted near the telephone. The facility's contingency plan was sent to local authorities and emergency responders, upon revision.

Manifests – Manifests generated since the last inspection were reviewed. The last waste shipment was on 5/10/2010 and consisted of used forklift (industrial) batteries.

Hazardous Waste (HW) Satellite Accumulation Areas (SAAs) –

1. **Universal Waste** – One box of used fluorescent lamps (containing mercury) was stored in the Boiler Room at the time of the inspection.
2. **Oil Storage Building** – one aerosol can crusher with filter and 15-gallon drum is utilized. Crushed cans are sent off as scrap metal to be recycled.

Less than 90 Day Hazardous Waste Storage Area(s) – There are no hazardous waste storage areas located on-site.

Used Oil is generated on-site and kept in the Oil Storage Building.

Universal Waste (UW) – Used fluorescent lamps (containing mercury) are generated on-site. Two boxes of UW- lamps were stored on-site at the time of the inspection. The containers were closed, properly labeled, and dated 4/19/2011 and 4/21/11, respectively. Additionally, several types of used batteries are generated on-site.

External Facility conditions: Grass was a couple of feet high in the fields where most of the monitoring wells were located.

The following observations were made during the physical site inspection/walk-thru:

- Waste Storage Areas inspected inside the facility included the Boiler Room and Oil Storage Building. All waste containers were closed, in good condition and properly labeled.
- Monitoring well numbers 1, 4, 12, 17, 20 and 23 were inspected. Each well was locked, labeled and appeared to be in good condition (the concrete pads appeared to be undamaged).
- The former lagoon area appeared to be in good condition. (no cracks, erosion)

The following documents were reviewed during the inspection and found to be satisfactory:

- Cost estimate for post closure care
- Plat
- Sampling Analysis Plan (1993 – Appendix E, Permit App)
- Corrective action plan – System O & M plans
- Semi-Annual Groundwater Monitoring reports: Semi-Annual groundwater monitoring has been conducted as required (in May & November). Corresponding reports have been submitted to DWM, which are reviewed by Mary Siedlecki.

8. WASTE MINIMIZATION:

The facility has a written waste minimization plan that is reviewed annually.

9. **COMMENTS & RECOMMENDATIONS:**

See attached "fact sheet" for a summary of the Square D/Schneider Electric – Knightdale site history.

A handwritten signature in cursive script that reads "Jenne S. Walker" followed by the initials "JSW". The signature is written in black ink on a white background.

Jenne S. Walker
Senior Environmental Specialist, NCDENR

***signed on November 9, 2011**

FACT SHEET

SCHNEIDER ELECTRIC COMPANY (FORMERLY SQUARE D)
8001 KNIGHTDALE BLVD
KNIGHTDALE, NORTH CAROLINA

A Draft Modified Permit has been prepared for Schneider Electric Company (formerly Square D) to decommission and remove the existing groundwater treatment system under the Federal Resource and Recovery Act (RCRA). The final remedy will continue to be monitored natural attenuation (MNA), as approved in the August 2007 HSWA-Only Permit. Performance monitoring will remain in place as required in the August 2007 HSWA-Only Permit. Additionally, the Modified Permit allows for an augmentation of the groundwater remedy, including implementation of *in situ* chemical oxidation (ISCO), should groundwater monitoring indicate the need for accelerated groundwater remediation.

North Carolina has been authorized by the United States Environmental Protection Agency to administer RCRA including the Hazardous and Solid Waste Amendments (HSWA) of 1984. The State has determined that Schneider Electric Company's proposed activities as identified in the application satisfies the full intent of the North Carolina Hazardous Waste Management Rules and Solid Waste Management Act as amended. When finalized this draft permit issued by the State of North Carolina will constitute a complete permit under the Federal Resource Conservation and Recovery Act.

The Schneider Electric Company (formerly Square D) facility is located on approximately 60 acres of land along NC State Highway 64 East (8001 Knightdale Boulevard) in Knightdale, North Carolina. The plant was constructed in 1972 and began manufacturing and assembling electronic equipment in 1973. Manufacturing operations ceased in 2003 and the plant is currently used as a design, engineering, fabrication, and packaging research facility.

The facility historically generated hazardous wastes from degreasing and electroplating operations. Four solid waste management units (SWMUs) were identified as having the potential to impact groundwater quality. These four SWMUs include: SWMU 26 (Spray Ponds), SWMU 27 (Closed Lagoons), SWMU 28 (Former Sludge Dewatering Area), and SWMU 29 (Drainage Ditch). A post-closure Hazardous Waste Management Permit was issued in September 1991 for care and monitoring of the closed lagoons (SWMU 27).

The three other SWMUS (SWMU 26, SWMU 28, and SWMU 29) were investigated as part of a RCRA Facility Investigation. Based on the results of the RCRA Facility Investigation, it was concluded that the Spray Ponds (SWMU 26) and the Former Sludge Dewater Area (SWMU 28) did not represent potential sources of groundwater contamination. Although the Drainage Ditch (SWMU 29) may have contributed to groundwater contamination in the past, any potential sources along the ditch have been removed.

Historic groundwater monitoring data indicated the presence of four constituents of concern, including perchloroethylene, 1,1-dichloroethene, 1,1,1-trichloroethane, and 1,1-dichloroethane. The post-closure Hazardous Waste Permit issued in September 1991 required the design and construction of an interim corrective measure for control of groundwater impacted by contaminants. The system, consisting of three recovery wells, was installed in 1993. Recovered groundwater was treated by air stripping and carbon absorption prior to discharge to Marks Creek.

A site assessment was conducted for the closed lagoons (SWMU 27) in April 2003. Based on the results of the site assessment, the facility submitted a Revised Closure Plan in October 2003. The NC Hazardous Waste Section approved the Closure Plan in November 2003. A Closure Certification Report was submitted in June 2004 and the two lagoons, which had previously been closed with waste-in-place, were certified as clean closed on June 20, 2005.

Although the facility had submitted a RCRA post-closure Hazardous Waste Permit Renewal application in 2001, clean closure of the lagoons meant there were no hazardous waste management units subject to post-closure care under RCRA. Consequently, the facility submitted a Hazardous and Solid Waste Amendments (HSWA)-Only Permit Application in August 2004 for corrective action of remnant groundwater contamination. The facility proposed monitored natural attenuation (MNA) as an alternative remedy to the groundwater extraction system which had been in operation. This alternative remedy was proposed after groundwater monitoring data showed that the groundwater extraction system had reached the limits of its efficacy.

The groundwater extraction system was shut down with regulatory approval in August 2007 and MNA was approved as the final remedy, contingent upon verification of efficacy. This permit modification is for the decommissioning and removal of the existing pump and treat system. Additionally, the permit modification provides for an augmentation of the groundwater remedy, including implementation of *in situ* chemical oxidation (ISCO), should groundwater monitoring indicate the need for accelerated groundwater remediation.

The North Carolina Hazardous Waste Management Rules require that the public be given a forty-five (45) day period to comment on the draft permit. This forty-five (45) day period will commence on August 21, 2011. The draft permit is available for review during office hours (9:00 a.m. to 4:00 p.m.) Monday through Friday. All data submitted by the applicant is available as part of the administrative record. Call (919) 508-8564 for an appointment to view the administrative record in the Hazardous Waste Section file room. In the event that Hazardous Waste Section file room is inaccessible, you may call Mary Siedlecki at 919-508-8568 to set up an appointment to view the administrative record for the facility.

Persons wishing to comment on either this permit or the proposed permit conditions or to object to the permit issuance should submit such comments in writing prior to October 5, 2011. All comments received within the forty-five (45) day period will be considered before the final permit decision is made. Comments should be sent to:

Elizabeth Cannon, Section Chief
NC Department of Waste Management
Hazardous Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646

A Public Hearing will be held September 20, 2011 at 1:00 pm at the East Regional Library located at 946 Steeple Square Court in Knightdale, North Carolina. Attendees may submit a written statement for the official record in addition to their oral statement or they may submit written comments in lieu of making an oral presentation. When a final permit decision is made to modify the permit, notice will be given to the applicant and to each person who has submitted written comments or requested notice of the final decision.