

Hazardous Waste Section
File Room Document Transmittal Sheet

17

Your Name: Spring Allen
EPA ID: NCR000137242
Facility Name: Consolidated Metco, Inc.
Document Group: Inspection/Investigation (I)
Document Type: Compliance Evaluation Inspection (CEI)
Description:
Date of Doc: 4/12/2011
Author of Doc: Spring Allen

File Room Use Only

NCR000137242

Date Recieved by File Room:

| Month | Day | Year |
|-------|-----|------|
| | | |
| | | |

Scanner's Initials:

Date Scanned:

**Hazardous Waste Section
File Room Document Transmittal Sheet**

*Entry sheet
wrong*

I. Identification:
Fill out form completely and accurately before sending it to File Room

| | |
|----------------------|--|
| Your Name | Spring Alien (061) |
| | N C R 0 0 0 1 3 7 5 8 8 |
| Facility Name | Consolidated Metco, Inc. <i>242</i> |
| | <small>Facility's Name as it appears in RCRAInfo</small> |

II. Document Type:
Highlight, check or Circle ONLY ONE Document Type below

| | | |
|--|--|---|
| General (G) <input type="checkbox"/> Compliance Assistance Visit (CAV) <input type="checkbox"/> Fees/Invoices (F) <input type="checkbox"/> Hazardous Waste Report (HWR) <input type="checkbox"/> Notification 8700 (8700) <input type="checkbox"/> Technical Assistance (TA) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) | Permit (P) <input type="checkbox"/> Alternative to Post-Closure Permit (APC) <input type="checkbox"/> Emergency Permit (EMP) <input type="checkbox"/> Modification (MOD) <input type="checkbox"/> Notice of Deficiency (NOD) <input type="checkbox"/> Part A Application (PA) <input type="checkbox"/> Part B Application (PB) <input type="checkbox"/> Permitting Information (PI) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) | Corrective Action (CA) <input type="checkbox"/> Confirmatory Sampling (CS) <input type="checkbox"/> Corrective Action Information (CAI) <input type="checkbox"/> Corrective Measure Plan/Design (CMPD) <input type="checkbox"/> Corrective Measures Study (CMS) <input type="checkbox"/> Environmental Indicators (EI) <input type="checkbox"/> HSWA Remedy (HSWA) <input type="checkbox"/> Interim Measures Study/Plan/Implemented (IM) <input type="checkbox"/> Land Use Restriction, Institutional Controls (LUR) <input type="checkbox"/> RCRA Facility Assessment (RFA) <input type="checkbox"/> RCRA Facility Investigation (RFI) <input type="checkbox"/> Remediation System Effective Reports (RSER) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) |
| Closure (C) <input type="checkbox"/> Closure Information (CI) <input type="checkbox"/> Closure Plan (CP) <input type="checkbox"/> Closure Report/Certification (CR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) | Groundwater (GW) <input type="checkbox"/> Comprehensive Monitoring Event (CME) <input type="checkbox"/> Groundwater Monitoring Report (GMR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) | Enforcement (E) <input type="checkbox"/> Administrative Order on Consent (AOC) <input type="checkbox"/> Compliance Order (CO) <input type="checkbox"/> Enforcement Package (EP) <input type="checkbox"/> Immediate Action Notice of Violation (IANOV) <input type="checkbox"/> Notice of Violation (NOV) <input type="checkbox"/> Settlement Agreement (SA) <input type="checkbox"/> Ticket Notice of Violation (TNOV) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) |
| Inspection/Investigation (I) <input type="checkbox"/> Case Development Inspections (CDI) <input type="checkbox"/> Complaint Investigation (CMP) <input checked="" type="checkbox"/> Compliance Evaluation Inspection (CEI) <input type="checkbox"/> Compliance Schedule Evaluation (CSE) <input type="checkbox"/> Emergency Response (EMR) <input type="checkbox"/> Focused Compliance Inspection (FCI) <input type="checkbox"/> Sampling Event (SPL) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) | Financial (F) <input type="checkbox"/> Balance sheets (BS) <input type="checkbox"/> Financial record review (FRR) <input type="checkbox"/> Financial statements (FS) <input type="checkbox"/> Insurances (I) <input type="checkbox"/> Mechanisms and instruments (MI) <input type="checkbox"/> Tax returns (TR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O) | |

III. Description:
Use up to 256 characters to describe the document. Every word below can be used as a searchable index to locate the document

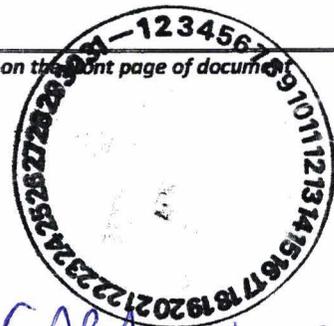
Con Met Canton cei LQG w/ ticket NOV docket # 2011-058

IV. Date of Document: Date when the document generated, the date typed or printed on the front page of document

| | | | |
|-------------------------|----------------------|--------------------|---------------------|
| Date on Document | 04 | 12 | 2011 |
| | <small>Month</small> | <small>Day</small> | <small>Year</small> |

V. File Room Use Only:

| | | | |
|--------------------------|-------|-----|------|
| Date Received | Month | Day | Year |
| Date Scanned | Month | Day | Year |
| Scanners Initials | | | |



242
 Esin CARA w/coorped
 EPA ID# NCR000137588
 Duty entry sheet has wrong
 EPA ID# Not in LF.R

Hazardous Waste Compliance Data Entry Form – Side A



EPA ID Number: NCD 000 136 242

Facility Name: Consolidated Metco, Inc.
 Street: 171 Great Oak Lane
 City: Canton Zip: 28716
 County: Haywood

EVALUATION DATA New: XX Change: _____ Delete: _____

Date: 04/12/2011 Evaluation Type: CEI
 Date: / / 2011 Evaluation Type: _____

Inspector ID #: 061 Reason: _____

Evaluation Comments: ticket nov docket # 2011-058

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)
 a SNC (SNY evaluation) Docket # _____
 or
 no longer a SNC (SNN evaluation)

YES / NO CSE ONLY

| 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 |
|----------------|--------|-------------------------------|------------------------|---------------------------|---------------------------|----------------------------|
| | | | | | | |

Date Determined: 04/12/2011
 Branch: 01 Person: 061

Return to Compliance: 05/15/2011 0 / 0 / 2011
 Scheduled Actual
 Regulation Description: 40 CFR 262.34(a)(1)(i) waste outside of container Comment: _____

Date Determined: 04/12/2011
 Branch: 01 Person: 061

Return to Compliance: 05/15/2011 0 / 0 / 2011
 Scheduled Actual
 Regulation Description: 40 CFR 262.34(c)(1) satellite accumulation *contains too close* Comment: _____

Date Determined: 04/12/2011
 Branch: 01 Person: 061

Return to Compliance: 05/15/2011 0 / 0 / 2011
 Scheduled Actual
 Regulation Description: 40 CFR 262.34(d) – 265.173(a) open containers Comment: _____

RCRA INSPECTION REPORT

x= VIOLATION NOTED NA= NOT APPLICABLE

Facility Name: Consolidated Metco, Inc – Canton
Location: 171 Great Oak Lane, Canton, NC 28716
Mailing Address: 171 Great Oak Lane, Canton, NC 28716
EPA ID#: NCR 000 137 588 **Phone Number:** 828-400-3789
Contact/ Title: Everett Lynch EH&S **Inspection Date:** April 12, 2011
Last Inspection: June 29, 2010 **Status:** Large Quantity Generator
Type of Inspection: CEI **Inspector(s):** Spring Allen

Present at Inspection: Joyce Evans, Spring Allen

Type of Business: Con Met is a manufacturer of ejection molded cabinetry components for the transportation industry. They specialize in components for sleeper units in semi trucks. The facility operates on an eight (8) acre property with active manufacturing in a 300,000 square foot building. They operate two(2) 12-hour shifts, five days per week, but will change to four (4) 12 hour shifts alternating personnel to allow continuous operation as well as time off for personnel. The facility is served by municipal water and sewer.

Distance to Neighbors: < 1/2 mile **Number of Employees:** 273
Wells on-site / off-site? NA / unk **NAICS #** 326199

Wastes Generated: hazardous or regulated waste streams generated on-site:

D001/ F003 paint related waste D001/35/ F003/5 Acetone/ Isopropyl solids
Universal waste lamps Used oils

Universal waste lamps are stored in a corner area of the maintenance area. None were in storage at the time of inspection. They are currently storing spent ink cartridges in three fiber drums in the area. Manifests indicate that U-Waste is manifested off site on a regular basis.

Manifests: Approved Transporters? yes Approved TSDF? yes
Filled out correctly? yes Signed Copies? yes LDR Notification Attached? yes
Comments - Manifests are in good order. LDR is attached to each manifest.

Transporters: Maumee Express, Inc. NJD 986 607 380
Freehold Cartage, Inc. NJD 054 126 164
Triad Transport, Inc. ARD 981 057 870

TSDF's: RINECO ARD 981 057 870

Waste Minimization:

The facility uses a computer program to track waste generation and resource usage. They conduct pre-paint and pre-assembly parts inspection. They use robotic paint booths to minimize paint use. And use vibration and ultra-sonic welding techniques to eliminate use of glues. Additionally, they regrind a percentage of waste plastics to reintroduce into their injection molding processes. They use a hydro-graphic process to embellish edge parts. Towels are sent to Ara-Mark uniform service for laundering. They also have an aggressive SW recycling program.

Inspection Records: Weekly inspections have been conducted and recorded as required, every seven days.

Contingency Plan: On-Site? yes Any Changes to facility/ processes or Emergency Coordinators since last review? yes Are changes needed to the plan? no Has the plan been Implemented? no (If yes, comment about adequacy)
The contingency plan was last updated on February 14, 2011 to change emergency coordinators. The primary emergency coordinator is Nate Dingus, the plant manager. The alternates are, Gene McCurry, Curtis Cole, and Everett Lynch The fire marshal recently conducted the annual facility inspection. The facility is advised to document visits such as this. Spill kits, located throughout the plant are identified on the site map.

Training Records: Certified Training Records Available?
The facility conducted training for 11 personnel on October 5, 2010. Only five (5) of these are actually HW handlers. The others are supervisors for these departments. Training included contingency plan review. Emergency Coordinators were retrained for the contingency plan on 3-11-2011.
New Employees Since Last Inspection? no
Evidence of Improper/ Inadequate Training? no

Biennial Report Submitted: February 16, 2010 - electronic filing

Emergency Preparedness:

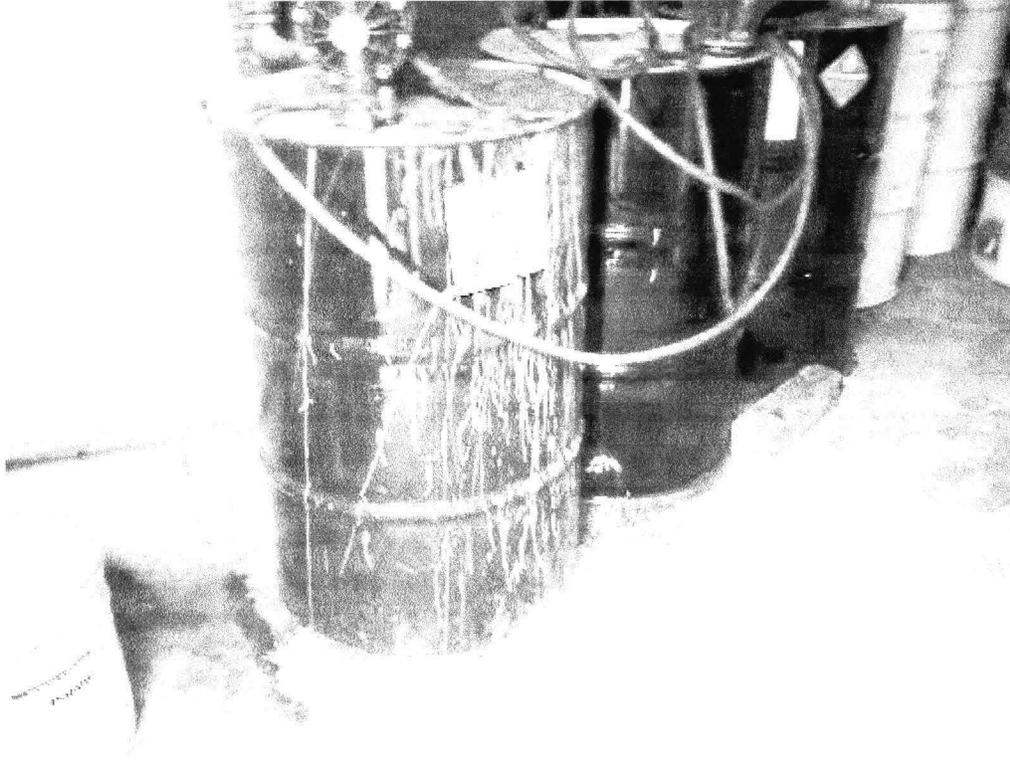
Facility Maintained and Operated to Prevent Releases? yes
Internal Communications or Alarm Present? yes
Portable Fire Extinguishers and/ or Fire Control Equipment? yes
Spill Control Equipment: yes
Adequate Water Volume, Foam Equipment or Sprinkler System? yes
All equipment / alarms tested/ maintained? yes
All Personnel Handling HW have access to Alarm/ Device? yes, cellular phones
Adequate Aisle Space in operation areas? yes

Satellite Accumulation Area(s):

Location(s) / Description of waste: ___
D001/ F003/ F005 paint waste – 1 -5-gallon inside the robotic arm paint booth.
D001/F003/F005 paint waste – 1-1 gallon container outside the pump room in the hydro-graphic paint area. (open & release)
D001/F003/F005 paint waste – 2-1 gallon container inside the pump room (one open)

Closed? no Labeled/ ID yes <55 gallons? yes waste in containers? no

The facility changed their process in the robotic arm paint booth to assure the accumulation container remains closed unless adding or removing waste.



ConMet Canton release around accumulation containers in the storage building



ConMet Canton 2 accumulation containers side-by-side – both are almost full



ConMet Canton funnel on accumulation container build-up will not allow the funnel to be latched / the funnel is not fitted with a device to assure the container is closed.

Storage Area(s): The storage area is a 25' X 25' concrete block storage building with a concrete containment floor, built in 2010. The building is divided into two areas: one for HW storage and the other for liquid products storage. It is equipped with a spill kit and fire extinguishers and other safety equipment. Containers are stored in marked lines identified as HW storage. At the time of inspection 15 containers holding D001/ F003 paint related waste were in storage. Each was labeled, dated, and closed as required. Additionally, there were two accumulation containers in the building: one for solids, and one for accumulation of F003 / D001 liquids. Containers were side-by-side and were almost full. One container showed evidence of released waste on the floor surrounding it and the other was open as its funnel was covered with waste and could not close. Additionally, it was not fitted with a device to prevent release of waste constituents into the air. Personnel carry cellular phones for communication. No universal waste was stored in the maintenance area at the time of inspection. The facility is storing waste ink cartridges for recycling in fiber drums in this area.

Containers closed? no

Aisle Space? yes

Labeled? yes

Evidence of Release? yes

<90 days? yes

Good Condition? yes

Site Deficiencies:

40 CFR 262.34(a)(1)(i) Two (2) 55-gallon accumulation containers holding D001/ F003 paint waste had waste outside the container, including on the floor surrounding one of the 55-gallon containers. These were satellite accumulation containers located in the HW storage building. (3 photos taken with door open)

One (1) 1-gallon accumulation container holding D001 / D035/ F003/ F005 Acetone/ Isopropyl solids had waste outside the container, and on the floor in front of the bench holding the 1-gallon container. This container is located outside the manual spray booth.

40 CFR 262.34(c)(1) Two 55-gallon containers identified as satellite accumulation containers were located side by side in the HW storage building. Both were almost full. (photos)

40 CFR 262.34(d) / 265.173(a) Three accumulation containers holding F003/ D001 paint waste were open at the time of inspection. These containers were located in the HW storage building, in the manual spray booth, and outside the manual spray booth. (photos in storage area, none taken at spray booths due to vapors)

Recommendations:

The Following Recommendations are offered as part of the Compliance Evaluation Inspection conducted on April 12, 2011.

1. Continue to update arrangements with emergency responders with personal contact each three years at minimum as discussed.
2. Develop a general maintenance schedule for areas where hazardous wastes and other chemicals are stored to assure areas are kept clean, containers closed, and waste is inside containers.

Spring Denise Allen 4-12-2011
Inspector (Date)

by mail

Facility Contact (Date)