

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Jenne Walker
EPA ID: NCR000149484
Facility Name: Printcom, Inc.
Document Group: Inspection/Investigation (I)
Document Type: Compliance Schedule Evaluation (CSE)
Description:
Date of Doc: 5/10/2011
Author of Doc: Jenne Walker

File Room Use Only

NCR000149484

Date Recieved by File Room:

Month	Day	Year

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Date Scanned:

Hazardous Waste Section File Room Document Transmittal Sheet

I. Identification:

Fill out form completely and accurately before sending it to File Room

Your Name	Walker, Jenne		
	<small>Print Your Name Above (Last, First)</small>		
EPA ID #	N	C	R 0 0 0 1 4 9 4 8 4
Facility Name	Printcom, Inc.		
	<small>Facility's Name as it appears in RCRAInfo</small>		

II. Document Type:

Highlight, check or Circle ONLY ONE Document Type below

<p>General (G)</p> <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)	<p>Permit (P)</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)	<p>Corrective Action (CA)</p> <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)
<p>Closure (C)</p> <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)	<p>Groundwater (GW)</p> <input type="checkbox"/> Comprehensive Monitoring Event (CME) <input type="checkbox"/> Groundwater Monitoring Report (GMR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p>Enforcement (E)</p> <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)
<p>Inspection/Investigation (I)</p> <input type="checkbox"/> Case Development Inspections (CDI) <input type="checkbox"/> Complaint Investigation (CMP) <input checked="" type="checkbox"/> Compliance Schedule Evaluation (CSE) <input type="checkbox"/> Compliance Evaluation Inspection <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)	<p>Financial (F)</p> <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)	

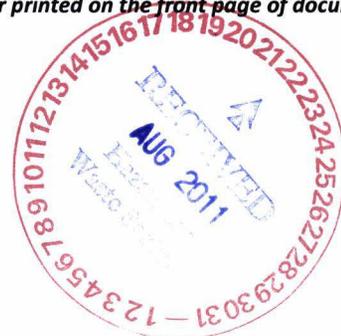
III. Description:

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

No further action required re: IANOV Docket 2011-064

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

Date on Document	05	10	2011
	<small>Month</small>	<small>Day</small>	<small>Year</small>



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

COMPLIANCE SCHEDULE EVALUATION (CSE) REPORT

1. FACILITY INFORMATION: DOCKET # 2011-064

Name: Printcom, Inc.
EPA ID Number: NCD 003 459 336
Type of Facility: Conditionally Exempt Small Quantity Generator
Facility Location: 2708 – K Discovery Drive, Raleigh NC 27617
Telephone Number: (919) 870-0596 (Dave Rockwell)
County: Wake

2. Facility Contacts: Dave Rockwell, Manager & Owner – Printcom, Inc.
Doug Watson, Property Owner

3. Survey Participants: Doug Watson, SpecCon, Inc. & Property Owner
Ken McAlister, Safety Kleen, Inc.
Jenne Walker, NCDENR – Hazardous Waste Section

4. Dates of Evaluation: May 10, 2011 – site visit
May 11, 2011 – date on manifest for second and last shipment of hazardous waste

5. PURPOSE OF EVALUATION: A site inspection was conducted to determine the status of the compliance schedule given in the Immediate Action Notice of Violation (IANOV), Docket # 2011-064. The IANOV was issued to the Owner of Printcom who is also the generator of the subject hazardous waste; and to Mr. Doug Watson, Property Owner (2708 Discovery Drive, Raleigh NC). The Printcom facility closed in March 2011 due to financial problems. Mr. Rockwell was unable to pay for proper disposal and therefore abandoned the hazardous waste generated by Printcom, Inc. that had accumulated on-site at 2708-K Discovery Drive.

Upon receipt of the IANOV, Mr. Doug Watson (Property Owner) immediately contracted with Safety Kleen to properly identify, remove, transport and dispose of the hazardous waste on the subject property. The CSE site visit was conducted to determine the status of the hazardous waste removal at the site.

6. FACILITY DESCRIPTION: REFER TO PREVIOUS INSPECTION.

HAZARDOUS WASTE STREAMS INCLUDE: REFER TO PREVIOUS INSPECTION.

7. **AREAS RE-INSPECTED DURING EVALUATION:** (OK = previous deficiency corrected; V = violation observed; NA = not applicable to this inspection)

Contingency Plan - NA

Personnel Training Records – NA

Accumulation Areas – NA

Inspection Logs - NA

Manifests – **OK; reviewed waste removal manifests**

OTHER – OK - *Waste Determination was conducted by Safety Kleen. Doug Watson (Property Owner) contracted with Safety Kleen to identify and properly remove all hazardous waste from the site.*

Waste Storage Areas – OK- *All hazardous waste was removed from the site by Safety Kleen on May 10, 2011.*

8. **PREVIOUS VIOLATIONS / DEFICIENCIES:**

Violation(s) previously cited as the result of the April 1, 2011 Compliance Schedule Evaluation (CSE) pertained to the following regulation(s):

A. It is the determination of the Section that the containers located at the Printcom, Inc. facility were in poor condition and/or were not being managed in a way that is consistent for usable product, which constitutes the storage of solid/hazardous waste subject to all applicable requirements of 40 CFR Part 261 through Part 265 and Part 270, incorporated by reference in 15A NCAC 13A .0106 through .0110 and .0113.

1. 40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107(a), requires that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if the waste is a hazardous waste using the following method:
 - a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4.
 - b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.
 - c. If the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, he must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
 - i. Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 - ii. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

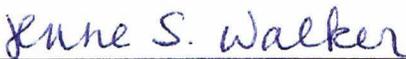
The Printcom, Inc. facility is in violation of 40 CFR 262.11, adopted by reference at 15A NCAC 13A .0107(a), in that a solid waste was generated as defined in 40 CFR 261.2 and a determination was not made by the generator whether that waste was a hazardous waste. Waste determinations in accordance with 40 CFR 262.11 must be made. The resulting hazardous waste must be managed by all applicable hazardous waste rules.

2. 15A NCAC 13A .0109(a), requires that any person who treats, stores, or disposes of hazardous waste shall comply with the requirements set forth in this section. The treatment, storage or disposal of hazardous waste is prohibited except as provided in 40 CFR Parts 264 and 265, adopted by reference in 15A NCAC 13A .0109 and .0110.

The Printcom, Inc. facility is in violation of 15A NCAC 13A .0109(a), in that hazardous waste has been stored without complying with the requirements set forth in 40 CFR Parts 264 and 265, adopted by reference in 15A NCAC 13A .0109 and .0110.

9. **CONCLUSION:** All hazardous waste (which was generated by Printcom, Inc.) has been properly identified and removed from the site by Safety Kleen, who was contracted to do so by the property owner, Doug Watson. The contractor stated that no spills were observed on or around the waste storage area of the facility. All violations cited and compliance schedule requirements specified in the May 23, 2011 IANOV have been resolved at this time.

* Notes: Mr. Watson stated that BB & T (Printcom's bank that declared foreclosure) took possession of and liquidated all remaining property in the warehouse. He also said the bank had removed all remaining materials (printers, products and solid waste) from the site by July 31, 2011. The outstanding (unpaid) Civil Penalty Assessment against Printcom, Inc. has been sent to Collections.



Jenne S. Walker
Senior Environmental Specialist, NCDENR

Date: June 6, 2011