

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: Heather Goldman

Facility ID Number: NCR000166876

Facility Name: Crossroads Coatings, Inc.

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: New LQG. No violations cited.

Date of Document: 4/12/2016

Author(s) of Document: Heather Goldman

Inspector ID #: NC111

Suborganization: Western Region

County (if not on report): Iredell

North Carolina Department of Environment and Natural Resources
 Division of Waste Management Hazardous Waste Section
Large Quantity Generator Inspection Report*

Facility Name: Crossroads Coatings, Inc. Date 4/12/2016/
 Site Address: 208 Buck's Industrial Park Drive, Statesville, NC 28625 (Verified in RCRAInfo? Yes No
 Mailing Address: PO BOX 1508, Statesville, NC 28687
 EPA ID #: NCR001668876
 Site Contact: Robert Lodgek Title: President
 Phone Number: (704) 873-2244
 Email: rlodgek@crossroadscoating.com
 Inspector: Heather Goldman - Environmental Senior Specialist
 Participants: Gary Martin -Plant Manager; John Hyde- Technical Director
 Legal Owner of Business: Crossroads Coatings, Inc.
 Legal Owner of Property: Wooten Real Estate and Investments
 Generator Status: SQG

Determined by: Statement from: _____ Manifests: _____ HW on-site (amt): Less than 100 g
 Facility Description: Site acreage: _____ Operating shift(s): 1 shift, Mo # Employees: 15
Water supply: Well Municipal Waste water treatment: Municipal Septic: On Site Treatment
Distance to on-site/off-site wells: _____ Closest private residence: _____

Facility Description(No. of buildings, size of buildings, operations conducted, locations HW is generated):
Crossroads Coatings, Inc. (facility) is a manufacturer of commercial and industrial coatings and produces a wide variety of paint types and colors. These include water based, latex, solvent, and lacquer based paints. Crossroads Coatings, Inc. only produces specialty batches based on the specifications of the buyer. Hazardous waste is primarily generated from cleaning of equipment between batches. Operations began at the facility on January 4, 2016.

Waste Streams (hazardous waste, universal waste, used oil, non-RCRA regulated waste, non-hazardous waste):

| <u>TYPE WASTE</u> | <u>COMMON NAME</u> | <u>WASTE CODE</u> |
|------------------------------------|--------------------|-------------------------------|
| <u>Waste Paint Relate Material</u> | | <u>D001, D035, F005, F003</u> |
| | | |
| | | |

*NOTE: This document is for assistance only. For complete regulations refer to Title 40 of the Federal Code of Regulations Part 260-279. This form does not contain all of the North Carolina Hazardous Waste Regulations and many of the regulations described are paraphrased. Division website located at: <http://portal.ncdenr.org/web/wm/hw> Revised: June 25, 2013

Document Review

- **262.11- Hazardous Waste Determination** Compliance Yes No
Generators must determine if their waste is hazardous.

- **261.2(f) – Documentation of claims material is not solid waste** Compliance Yes No
*Generators must document claims that materials are not solid wastes or are conditionally exempt from regulations.

- **262.12- EPA ID Numbers** Compliance Yes No
(a) Generators must acquire an EPA ID Number before they offer hazardous waste for shipment or disposal
(c) Generators must use approved TSDF's and Transporters with valid EPA ID numbers.

- **262.20- Manifest** Compliance Yes No
Manifests must be properly filled out for all hazardous waste shipments.
First and only shipment of 550 gallons hazardous waste in March 2016.

TSD Facilities:

| Facility Name | EPA ID # |
|-------------------------|--------------|
| Giant Resource Recovery | SCD036275626 |
| | |
| | |

Transporters:

| Transporter Name | EPA ID # |
|-----------------------------|--------------|
| Environmental Options, Inc. | VA0000122994 |
| | |
| | |

- **268.7 (a)(4)- LDR Certification** Compliance Yes No
Land Disposal Restrictions must accompany all waste streams sent to TSDF.

- **262.42- Exception Reports** Compliance Yes No
(a) (1) Facility must contact the transporter/designated facility if a manifest is not received within 35 days.
(2) Generator must submit an Exception Report if a manifest is not received within 45 days.

NA

265.16- Personnel Training & Job Description

Compliance Yes No

- a) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way to ensure compliance with these sections requirements.
- (2) Training must be conducted by a person trained in hazardous waste management procedures and training must include hazardous waste management training relevant to each employee's position (including contingency plan implementation).
- (3) Training should be designed to ensure that personnel can respond properly to emergencies.
- b) Personnel must complete the training within six months of their hire date or when they change job responsibilities.
- c) Personnel must take part in an annual review of the initial training.
- d) The following documents must be maintained at the facility:
 - (1) Job title and person filling position for each position related to hazardous waste management.
 - (2) A job description for each position listed above, including requisite skills, education, and qualifications. Position duties should also be recorded.
 - (3) A written description of the type and amount of initial and continuing training that will be given for each position.
 - (4) Records that document that the training or job experience have been completed by personnel.
- e) Training records on current personnel must be kept until closure of the facility. Training records on all former employees must be kept for at least three years from date of separation

| Name of Employee | Job Title | Hazardous Waste Job Duties | Date of Annual RCRA Review | Date of Previous Annual RCRA Review | RCRA Job Description (including requisite skills, education and qualifications) Yes/No | Date of Contingency Plan Review |
|------------------|--------------------------|--------------------------------------|----------------------------|-------------------------------------|----------------------------------------------------------------------------------------|---------------------------------|
| Gary Martin | Plant/Production Manager | Sign Manifest; Secondary Eermgency C | Needs external tr | | | 4/11/2016 |
| 12 Employees | Various | Various | 4/11/2016 | | | 4/11/2016 |
| Gus Lodgek | Primary Emergency Respo | Primary emergency coordinator | 4/11/2016 | | | 4/11/2016 |
| | | | | | | |

Facility Walkthrough

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• <u>262.30- Proper DOT Containers</u> <p>Waste must be packaged in accordance with applicable DOT regulations 49 CFR 173, 178, 179.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34 (a)- Accumulation Time</u> <p>A generator may accumulate hazardous waste on-site for 90 days or less without a permit. Production Area HWSA tote dated as 3/15/2016.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34 (a)(1)(i)- Storage Container Spills/Releases</u> <p>Waste must be placed <u>in</u> containers.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34(a)(1)(i) ref 265.176- Waste Placement</u> <p>Ignitable or reactive waste must be stored at least 50 feet from the property line</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34(a)(1)(i) ref 265.177- Incompatible Waste</u> <p>(a) Incompatible waste/materials must not be placed in the same container (b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste (c) Incompatible waste must be separated while in storage</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34 (a)(2)- Accumulation Start Dates</u> <p>Containers in storage must be dated when accumulation begins.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34 (a)(3)- Storage Container Labeling</u> <p>Containers in storage area must be labeled "Hazardous Waste".</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34(c)(1)- Satellite Container Spills/Releases</u> <p>No more than 55-gallons may be placed <u>in</u> containers at or near the point of generation under the control of the operator. No spills of haz. waste on/around satellite accumulation containers. No satellite containers observed on-site.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34(c)(1)(i) ref 265.171- Container Condition</u> <p>Container in poor condition must be replaced.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34(c)(1)(i) ref 265.172- Container Compatibility</u> <p>Containers must be compatible with the waste they hold.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34(c) (1) (i) ref 265.173(a)- Container Management</u> <p>Containers must be maintained in a closed position unless adding or removing waste.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none">• <u>262.34(c) (1) (ii) - Satellite Container Labeling</u> <p>Satellite containers must be marked with the words "Hazardous Waste" or other words to describe the contents.</p> <hr/> | Compliance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

- **265.31- Maintenance and Operation of Facility** Compliance Yes No

Facility must be operated to minimize the possibility of a fire or any unplanned sudden or non-sudden release of hazardous waste that threatens health or environment.

- **265.32- Required Equipment** Compliance Yes No

Facilities must have the following equipment unless not needed.

(a) Internal communications or alarm system that provides emergency instruction to personnel.
 (b) A telephone or two-way radio must be available at the scene of operation to summon emergency assistance.
 (c) Fire extinguishers and fire control equipment spill control, and decontamination equipment.
 (d) Adequate water volume and pressure to supply fire hoses, automatic sprinklers, or water spray systems.

- **265.34- Access to Communications** Compliance Yes No

(a) Whenever hazardous waste is being handled, all personnel involved must have access to an alarm or communication device. Visual or voice contact is allowed.
 (b) If there is just one person at the facility, while in operation, they must have immediate access to a telephone or two-way radio capable of summoning emergency assistance.

It is recommended that the facility have a written policy for communication in HWSA.

- **265.35- Required Aisle Space (15A NCAC 13A .0110 (c))** Compliance Yes No

Two feet of aisle space must be maintained to allow unobstructed movement of personnel or safety equipment.

Used Oil (Generator)

- **279.22- Used Oil Storage** Compliance Yes No

(a) Used oil must be stored in tanks or containers
 (b) Used oil containers must be in good condition and not leaking
 (c) (1) Used oil tanks and containers must be labeled with the words "Used Oil".
 (2) Fill lines for used oil UST's must be labeled with words "Used Oil"
 (d) When a used oil release is found the release must be:
 (1) Stopped
 (2) Contained
 (3) Cleaned and managed properly
 (4) Tanks or containers must be repaired before reuse.

Universal Waste – Small Quantity Handler (Lamps & Batteries)

- **273.13 (a)- Used Battery Management** Compliance Yes No

All used batteries must be contained if damaged.

No used batteries accumulated on site.

- **273.14 (a)- Used Battery Labeling** Compliance Yes No

Each battery/container of batteries must be labeled w/ the words "Universal Waste-Batteries", "Waste Batteries", or "Used Batteries".

NA

- **273.13 (d)- Used Lamp Management** Compliance Yes No

Used lamps must be properly containerized to prevent breakage and containers of lamps must be properly closed.

- **273.14 (e)- Used Lamp Labeling** Compliance Yes No
 Each lamp or container of lamps must be labeled with the words “Universal Waste-Lamps”, “Waste Lamps”, or “Used Lamps”.

- **273.15- Universal Waste Storage Time Limit** Compliance Yes No
 Universal waste must be stored for longer than one year and must be able to demonstrate how long the waste has been onsite. (Time limit exemption is available if requirements at 273.15 (b) are met)

- **273.16- Universal Waste Training** Compliance Yes No
 Universal waste handler must inform employees of proper handling and emergency procedures that are appropriate.
 Included in annual hazardous waste training.

Satellite Accumulation Area(s):

There were no satellite areas at the time of inspection.

Less Than 90-Day Hazardous Waste Storage Area(s):

In the Production Area, hazardous waste is stored in one 275-gallon tote. At the time of inspection, the tote was labeled, closed, and dated as 3/15/2016.

In a separate warehouse building, the facility is planning to store hazardous waste totes that originate in the Production Area. There were no hazardous waste containers stored in this Hazardous Waste Storage Area at the time of inspection. Fire extinguishers were located in the area. The facility plans to use cell phones or an air horn for emergency communication when in this area. It is strongly recommended that the facility develop and maintain a written procedures for emergency communication in the hazardous waste storage area.

Digital Photo Log:

Weather: ___ Sunny ___ Cloudy Rain ___ Storm

| <u>Picture Location</u> | <u>Time</u> | <u>Notes</u> |
|-------------------------|--------------------|----------------------------------|
| Pic #1: | 4/12/2016 11:09 AM | Raw Material in production area. |
| Pic #2: | | |
| Pic #3: | | |
| Pic #4: | | |
| Pic #5: | | |
| Pic #6: | | |
| Pic #7: | | |
| Pic #8: | | |
| Pic #9: | | |
| Pic #10: | | |

Documents Copied During Inspection:

None

Site Deficiencies:

Recommendations/Area of Concern/Action Items:

The facility is reminded that hazardous waste job descriptions must include requisite skills, education, and qualifications, as well as the type and amount of initial and continuing training that will be given for each position.

It is a reminder that hazardous waste training must be conducted by a person trained in hazardous waste management procedures. Mr. Martin conducted hazardous waste training to facility employees on 4/11/2016 and must be able to document hazardous waste training for himself.

Facility is reminded to maintain product as as valuable material. There were three containers that were identified as product. However, the material were in open/unlabeled containers. Picture is attached.

 4/26/2016
Inspector (Date)

Facility Contact (Date)

Photo 1

4/12/2016 11:09 AM



NOTES

Raw Material in production area.

Photo 2

NOTES

Photo 3

NOTES

Photo 4

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Photo 5

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Photo 6

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