

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

I. Identification:

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

Your Name	Bailey, Bradley											
	<small>Print Your Name Above (Last, First)</small>											
EPA ID #	N	C	D	9	8	0	6	0	0	5	9	7
Facility Name	KAO SPECIALTIES AMERICAS LLC											

II. Document Type:

Highlight, check or Circle ONLY ONE Document Type below

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

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

TNOV 2011-010 for KAO SPECIALTIES AMERICAS LLC

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

Date on Document	11	04	2010
	<small>Month</small>	<small>Day</small>	<small>Year</small>

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	<small>Month</small>	<small>Day</small>	<small>Year</small>
Scanners Initials			

not in CARA

**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 # 2011-010

Facility Name: Kao Specialties Americas LLC (KSA)
EPA ID Number: NCD 980 600 597
Type of Facility: LQG
Facility Location: 243 Woodbine Street, High Point, NC 27261
Mailing Address: P.O. Box 2316, High Point, NC 27261
Telephone Number: 336-878-4294

2. FACILITY CONTACT: Patrick Simcox – Environment, Health, & Safety Manager
psimcox@ksallc.com

3. DATE OF EVALUATION: January 02, 2011

4. PURPOSE OF INSPECTION: Follow-up evaluation to determine status of compliance with Ticket Notice of Violation Docket #2011-010. The NOV was issued December 06, 2010 subsequent to the inspection conducted on November 04, 2010.

5. FACILITY DESCRIPTION:

Kao Specialties Americas LLC (KSA) is a wholly owned subsidiary of Kao Corporation, Tokyo, Japan. Kao Corporation is a global company that develops, manufactures and markets personal hygiene, laundry, food, cosmetic and specialty chemical products. KSA operates three major business segments (1) Oleo specialties, (2) Chemical specialties and (3) Toner binder resins. Within the facility are three manufacturing areas identified as Plant 1, 2 and 3. Plant 1 contains batch reactors and mixing vessels which are capable of making amides, esters, phosphate esters and mixtures. Plant 2 produces surfactant products based on ethylene oxide and/or propylene oxide. Plant 3 produces resins for the reprographics industry. The products manufactured at the facility include: polyester toner resins for the reprographic industry; custom blend surfactants and fatty acids used for de-inking; custom manufactured nonionic, anionic, cationic and amphoteric surfactants; and aroma and oleo chemicals used in personal care and aroma products. The site is situated on approximately 60 acres in High Point. There appears to be eight contiguous parcels owned by HPC Realty Inc. and High Point Textile Auxiliaries LLC. The main office is open five days per week 8am-5pm. Production is a 12-hour rotating shift seven days per week 7am-7pm. There are approximately 150 employees. The facility receives its water and sewer services from City of High Point. There are no known wells on site.

The facility maintains a pretreatment permit with the City of High Point to release industrial wastewater to the city's POTW.

6. WASTE STREAMS INCLUDE:

Hazardous wastes are generated from the on-site quality assurance, R & D laboratories, off-specification product or batches that cannot be reworked into product and spill clean-up. Hazardous waste generated at the facility varies depends on the manufacturing process. **The facility notified as a LQG but is operating as a SQG.** The following waste streams were noted during the visit as consistent laboratory waste streams:

UN3264-Waste Corrosive Liquid, Acidic, inorganic (Phosphoric acid) [D002]

UN2924-Waste Flammable Liquids, Corrosive (methanol, sulfuric acid) [D001, D002, D007, D009, D011]

UN1040-Waste Ethylene Oxide [U115, D001]

UN1993-Waste Flammable Liquids (toluene, chloroform)[D001,D022,D035,D038,F003,F005]

Used Oil, Universal Waste Lamps and Batteries

7. AREAS OF REVIEW AND EVALUATION: The following areas were reviewed during the CSE:

- **Inspection Records (storage):** The facility changed their 9700-107 Hazardous Waste Storage Procedure and performs inspections every 7 days of the less than 90 day storage area.
- **Accumulation Areas:** The following satellite accumulation area was reviewed during the inspection:
Wastewater Laboratory: A 20-gallon container is used to accumulate COD vials generated from testing wastewater at the wastewater treatment plant.

8. SITE DEFICIENCIES: Violation (s) previously cited to the following regulations:

- a) **15A NCAC 13A .0107(d): A generator shall keep records of weekly inspections of the hazardous waste storage area and results of inspections required by Sections 262.34 for at least three years from the date of inspection.**

IN COMPLIANCE: The facility sent correspondence (30DEC2010) describing revised work instruction.

- b) **40 CFR 262.34(c)(1)(ii): A generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, provided he marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.**

IN COMPLIANCE: The facility sent photographic evidence that the violation had been corrected.

9. CONCLUSIONS: Kao Specialties Americas LLC was found in compliance with Ticket Notice of Violation Docket # 2011-010. This Ticket Notice of Violation was issued for the site deficiencies noted during the Compliance Evaluation Inspection conducted on November 04, 2010.

Bradley Bailey

Date: 27 January 2011

Bradley Bailey
Environmental Senior Specialist, NCDENR