

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

**Your Name:** Bobby Nelms

**Facility ID Number:** NCR000163592

**Facility Name:** FCC (North Carolina) LLC – Paper Plant

**Document Group:** General (G)

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**Author(s) of Document:** Bobby Nelms

**Inspector ID #:** NC036

**Suborganization:** Eastern Region

**County (if not on report):** Scotland

**STATE OF NORTH CAROLINA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION**

**COMPLIANCE ASSISTANCE VISIT (CAV) REPORT**

**1. FACILITY INFORMATION:**

Name of Facility: FCC (North Carolina) LLC – Paper Plant  
EPA ID Number: NCR 000 163 592  
Type of Facility: Small Quantity Generator (SQG)  
Facility Location: 16820 US Highway 401  
Laurinburg, NC 28352  
County: Scotland  
Telephone Number: (910) 462-0279  
Ownership: FCC CO LTD

**2. FACILITY CONTACT:** Wayne Cromartie - Environmental, Health, and Safety Manager  
Email: wcromartie@fccnc.com

**3. INSPECTION PARTICIPANTS:** Ella Kunu – Administration Coordinator, FCC  
ekunu@fccnc.com  
Bobby Nelms, NCDEQ

**4. DATE OF INSPECTION:** March 10, 2016, never inspected before

**5. PURPOSE OF INSPECTION:** Announced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279.

**6. FACILITY DESCRIPTION:**

FCC (North Carolina) LLC manufactures clutch plates for automobiles and ATV's. A special adhesive is applied to metal plates and clutch paper which causes the two to chemically bond. The FCC Paper Plant manufactures the clutch paper used at the sister plant.

The facility occupies 25 acres and has one approximately 129,000 SF building on the property. The closest residence is approximately 150 feet from the property line and an off-site well is suspected on that property. There are three wells on site for raw process water. Potable water and sewer are provided by the City of Laurinburg utilities. The facility presently employs 42 people and operates three shifts seven days per week.

FCC has a water treatment facility used to treat raw water. The treatment facility consists of four tanks; one neutralization tank, one equalization tank, one clarifier tank, and a sludge tank. All sludge from the sludge tank is sent to a filter press and the resulting

water is discharged to the POTW while the filtered sludge is landfilled. A permit for the treatment system has been applied for but is pending.

Pulp, water, and other proprietary ingredients are mixed and sent to the paper laydown process which creates “raw paper.” A continuous line then goes to the impregnation process where resin is added by dip tanks. Hazardous waste is generated when a resin batch is left over. After the impregnation process, the paper makes its way to the dryer, then to the stamping process. Currently there is one process line but the facility was designed and constructed with the anticipation of two additional lines being added. The facility has a tank farm on site for raw materials. Currently there are six tanks; Resins A,B,&C, Methanol, Acetone, and an empty tank for future processes.

## 7. WASTE STREAMS INCLUDE:

The facility uses chemical resins which are thinned with acetone and methanol. The majority of the hazardous waste generated is from the disposal of this acetone/methanol mixture which is considered ignitable (D001). The following waste streams are most often generated at the site:

Waste Flammable Liquid (Methanol/Acetone) – D001, F003 from  
Adhesive/Acetone mixture from flushing of lines and cleaning of equipment  
Waste Flammable Solids (Methanol/Acetone) – D001 from rags which are disposed  
Used Oil  
Entire facility uses LED lighting.

## 8. AREAS OF REVIEW AND INSPECTION:

**Emergency Preparedness** – The facility should issue letters to the local emergency authorities describing the emergency arrangements requested from each agency. Example letters will be attached on an email to Ms. Kunu.

**Contingency Plan** – Emergency numbers were posted next to the telephone but, as discussed during the inspection, if the facility determines that the Large Quantity Generator (LQG) status has been breached, a full contingency plan must be developed. I recommend that you consider development of an LQG plan since the facility will likely become an LQG once additional process lines are added.

**Inspection Records (storage)** – The 2015 - 2016 weekly inspections were reviewed. I recommended that the form being used specify that the inspector is checking for open containers, labels, dates, and corrosion/condition of containers.

**Manifests / LDR** – All manifests for 2015 and 2016 were reviewed. The signed returned copies of the manifests were not available for review. Locate the signed copies of each manifest and the Land Disposal Restriction (LDR) form for each waste stream and have them available for inspection.

**Transporters**

Univar GAD980845077  
DuPre Transport LAR000045963

**TSDs**

Giant Resource SCD036275622

**Training Records** – Training records are not required for SQG’s however, it is required that the facility ensures that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

If you eventually become an LQG, Job titles and job descriptions will become a requirement along with training records and a contingency plan.

**Accumulation Areas:**

Waste is generated in the resin room where the impregnation process occurs. During the inspection, this area was inaccessible without a respirator so the accumulation container was observed through a doorway. There appeared to be one 55 gallon drum of waste in the area but I could not tell if it was labeled. Be certain that 55 gallons of hazardous waste is not exceeded in satellite accumulation areas, the container remains closed unless waste is being added or removed, and the contents of the container must be identified (i.e. “hazardous waste” label).

**Storage Areas:**

The less than 180 day hazardous storage area is located in the chemical room. On the day of the inspection, there were ten 55-gallon metal containers of adhesive/acetone waste (D001/F003). These containers were dated and properly closed but the words “Hazardous Waste” were not on the containers. The containers must be labeled with the words “Hazardous Waste.” The room was equipped with spill containment, fire suppression, and radios are used as emergency communication devices.

Solvent Wipes which are accumulated may be eligible for the solvent wipe exclusion thereby making them a non-hazardous waste. A link to the guidance document related to this subject can be found below.

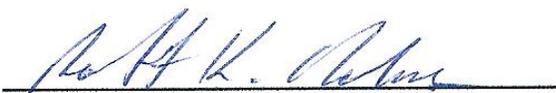
**External Condition of Facility:** There were no adverse conditions noted.

**9. WASTE MINIMIZATION:** Best Management Practices

**10. ACTION ITEMS/RECOMENDATIONS:**

**An unannounced inspection will be conducted in the coming months. As mentioned during the inspection, the facility’s generations amounts appear to be very close to LQG status. Pay special attention to waste generation amounts and understand that you are expected to comply with all regulations which pertain to your actual generator status.**

- Immediately issue letters to the local emergency authorities describing the emergency arrangements requested from each agency.
- Modify the weekly inspection form being used to specify that the inspector is checking for open containers, labels, dates, and corrosion/condition of containers.
- Immediately locate the signed copies of each manifest and the Land Disposal Restriction (LDR) form for each waste stream.
- Immediately label all hazardous waste containers in the storage area with the words “Hazardous Waste.”
- Consider development of an LQG contingency plan since the facility will likely become an LQG once additional process lines are added.
- If it has not been done, have an analysis conducted of the sludge being sent to the landfill to insure that it is non-hazardous.
- Consider if the solvent wipe exclusion is beneficial to your facility and consider using it. A link to the guidance document can be found at:  
<https://ncdenr.s3.amazonaws.com/s3fs-public/Waste%20Management/DWM/HW/Guidance%20Document%20table%20documents/2014/Solvent%20Wipes%20Guidance%20March%202014WEB.pdf>
- Update the facility contact information to reflect Ella Kunu as the contact by using the EPA form 8700-12.  
The form can be found at: [https://www.epa.gov/sites/production/files/2015-11/documents/notification\\_rcra\\_sutitle\\_c\\_activity\\_instructions\\_forms.pdf](https://www.epa.gov/sites/production/files/2015-11/documents/notification_rcra_sutitle_c_activity_instructions_forms.pdf)  
Submit the form to:  
Melodi Deaver  
N.C. Hazardous Waste Section  
1646 Mail Service Center  
Raleigh, NC 27699-1646



Robert K. Nelms  
Environmental Senior Specialist, NCDEQ

DATE: April 1, 2016

Emailed to Ella Kunu  
Facility Contact

DATE: April 1, 2016