

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

Your Name: Phil Orozco

Facility ID Number: NCR000135509

Facility Name: IPS Structural Adhesives

Document Group: Inspection/Investigation (I)

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Author(s) of Document: Phil Orozco

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County (if not on report): DURHAM

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

COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Name: **IPS Structural Adhesives Inc.**
EPA ID Number: **NCR000135509**
Type of Facility: Large Quantity Generator (LQG)
Facility Location: 600 Ellis Road
Durham, NC 27703
Telephone Number: 919-598-2427

2. AUTHOR OF REPORT: Phillip G. Orozco, Environmental Senior Specialist, NCDEQ
919-212-2501 phil.orozco@ncdenr.gov

3. FACILITY CONTACT(S):

Matt Elshenawy, Environmental, Health & Safety Engineer, 919-598-2427 (cell: 919-995-0726)
matt.elshenawy@scigrip.com
Kevin Connolly, Director of Operations 919-598-2429 kevin.connolly@ipscorp.com

4. SURVEY PARTICIPANTS: Matt Elshenawy, James Crisp (Production Manager), IPS; and,
Phillip G. Orozco

5. DATE OF INSPECTION: **March 16, 2016**

6. PURPOSE OF INSPECTION:

An unannounced inspection to determine compliance with regulations described at Chapter 40 of the Code of Federal Regulations (40 CFR) Parts 261, 262, 265, 268, 273, 279; and, Title 15A of the North Carolina Administrative Code (NCAC) Chapter 13, the North Carolina Hazardous Waste Management Rules (Rules). Previous inspections (CEIs) occurred on March 18, 2015, August 21, 2013, February 16, 2012, and February 14, 2011.

7. FACILITY DESCRIPTION:

IPS Structural Adhesives, Inc. (IPS) began operating in Durham in 2001. Initially, the facility operated as a small quantity generator (SQG) but was reclassified as a LQG in early 2005.

IPS manufactures high-performance product-assembly adhesives to manufacturers of a wide variety of capital goods in general industrial, transportation, and marine markets. The adhesives are used widely in the construction of new boats/yachts and also for DuPont Corian® countertops. The primary product consists of a two-component, toughened methacrylate adhesive. The primary hazardous waste (HW) is generated when large mixing pots are cleaned out with a MEK based solvent wash. The operation utilizes seven different mixing vessels with either a 60 gallon capacity or a 150 gallon capacity. The Durham facility also serves as the East Coast distributor for products manufactured at the parent facility in Compton, CA.

General Site Information:

- Owner of Business: IPS Corporation
- Owner of Property: IPS Corporation
- Number of employees: ~45
- Operating Shifts: one (8-5 M-F); the company may increase to 2 shifts in the near future
- Acreage – 4.23
- Square Footage of Facility: 33,000
- Areas inspected: the HW storage cage; loading dock; warehouse facility; mixing room; and the outside grounds of the building.
- Water supply (municipal or well): Municipal – City of Durham
- Municipal sewer/septic/on-site treatment facility: Municipal – City of Durham
- Distance to closest off-site well: ~ 600 ft. (on the grounds of a warehouse complex across Ellis Rd. from the entrance into IPS.
- Closest private residence: ~ 500 ft. due North of IPS at the intersection of Ellis Rd. and Angier Ave.

8. HAZARDOUS WASTE (HW) STREAMS INCLUDE:

Spent solvent wash (MEK) - **D001 / D035 / F005**

Waste Methyl Methacrylate (MMA) monomer & MMA contaminated material – **D001**

Universal Waste – Lamps (the facility now uses LED lamps in the manufacturing areas.

Unwanted electronics (E-waste) are sent to the IPS Corporate offices in Memphis, TN.

9. AREAS OF REVIEW AND INSPECTION:

Emergency Preparedness – In order to better document compliance with 40 CFR 265.37, IPS has sent letters similar to those developed by the HW Section to the appropriate authorities. The letters were sent certified mail on 10/7/09 and green cards are on file at IPS.

Biennial Report – OK. An electronic copy of the report was sent to the DWM – Hazardous Waste Section (Section) on 2/18/14.

Contingency Plan (CP) – The CP was last revised on 8/23/12. James Crisp is the Primary Emergency Coordinator. Matt Elshenawy and Kevin Connolly are alternate coordinators.

Job Descriptions – Job descriptions for the following persons appeared to be in compliance: James Crisp, Matt Elshenawy and Kevin Connolly.

Inspection Records (storage) – Complete

Training Records:

Records for the following people were reviewed:

Matt Elshenawy - Instructs the training sessions that meets the requirements of the Rules. Contingency Plan (CP) training is designated as Procedure EHS-110 and Hazardous Waste Operations (HWOps) is designated as EHS-111;

James Crisp - RCRA & DOT on-line training by NC State University Extension Services on 9/19/12; HWOps training EHS-111 on 8/7/13; CP training EHS-110 on 8/6/13 and 8/22/12; NC State University Extension Services RCRA & DOT training on 8/22/13 and 7/30/14.

Kevin Connolly – CP training EHS-110 on 8/22/12 and 2/12/13; HWOps training EHS-111 on 2/12/13 and 1/20/12. CP refresher training on 1/17/14 and 1/6/15. Mr. Connolly's only hazardous waste responsibility is to serve as an emergency coordinator alternate.

The appropriate training for the applicable persons occurred on November 10 & 21, 2014, and July 3 & 9, 2015.

Manifests / Land Disposal Restriction Notification (LDR) – Manifests since the last inspection were audited and found to be in compliance.

Transporters:

Univar USA GAD 980548 077
Dupre logistics LLC LAR000045963

Destination Facilities (TSD's):

Tradebe Environmental Services (formerly Pollution Control Industries (PCI) of TN)
TND 000 772 186
Heritage – WTI OHD 980 813 541

Satellite Accumulation Areas (SAAs):

Two SAAs are located in the Mixing Room. Liquid HW is accumulated in 55-gallon containers when a clean-out of a mixing pot becomes necessary. Once full, the drum is taken directly to the storage area by Mr. Crisp.

Two satellite containers are located in the cartridge packaging area.

All containers appeared to be properly labeled and closed.

Storage Areas:

HW is stored in the raw material storage area inside the main facility near the loading docks. HW containers are placed in a fenced-in cage area. The cage is always locked unless HW is being moved in or out of storage.

External Condition of Facility:

No adverse conditions observed.

10. **WASTE MINIMIZATION:** A written plan was developed and dated 2/8/11.
In 2011, IPS began bringing in a mobile recycling unit in order to recycle its spent solvent wash. This action has brought about a great financial savings. IPS continues this practice.
11. **SITE DEFICIENCIES:**
No Violations.


Phillip G. Orozco

Environmental Senior Specialist, NCDEQ

Date: April 8, 2016