

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

Your Name: WILLIAM HUNNEKE

Facility ID Number: NCR000164509

Facility Name: AIRBOSS RUBBER COMPOUNDING

Document Group: Inspection/Investigation (I)

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Author(s) of Document: William Hunneke

Inspector ID #: NC060

Suborganization: Eastern Region

County (if not on report): Halifax

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

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY INFORMATION:

Facility Name: **AIRBOSS RUBBER COMPOUNDING**

EPA ID Number: **NCR000164509**

Type of Facility: Small Quantity Generator (SQG), operating as conditionally exempt SQG.

Facility Location/
Mailing Address: 500 AirBoss Parkway, #100 Scotland Neck, North Carolina 27874
Halifax County

Telephone Number: 252 826-4919

Property Owner/
Legal Owner of Business: AirBoss Rubber Compounding

Property Owner Address: AirBoss Rubber Compounding, Inc. North Carolina Corporation

FACILITY CONTACTS:

Glen Partain, Plant Manager
Phone Number: 252 826-4919
Email Address: gpartain@airboss.ca

Teresa Sonder, Corporate EHS Manager (Kitchener, Ontario)
Phone Number: 519-576-5565 x3026
Email Address: tsonder@airboss.ca

PARTICIPANTS:

Representing AirBoss: Glen Partain; James Lyons, Maintenance Manager
Representing EPA Region 4: Raj Aiyar
Representing NCDEQ: William Hunneke

DATE OF SITE VISIT: **March 24, 2016** onsite: 1125 hrs. offsite: 1545 hrs.

PURPOSE OF SITE VISIT:

Unannounced Compliance Evaluation Inspection to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279. The facility has notified as a small quantity generator of hazardous waste. According to files, there is no record that the facility has previously undergone a compliance evaluation inspection. This was an EPA Lead Inspection.

FACILITY DESCRIPTION:

AirBoss Rubber Compounding (AirBoss) manufactures custom rubber compounds that are used for making military grade protective products, automotive tires, conveyor belt products for mining applications, and automotive parts. AirBoss has three plants in North America with a capacity to supply over 250 million pounds of rubber compounds annually. Two plants are located in Canada, (Acton Vale, Quebec and Kitchener, Ontario). The third and subject plant is located in Scotland Neck, North Carolina.

The Scotland Neck plant primarily manufactures rubber products for automotive tires. Currently, forty-seven employees work at the plant operating over two 8-Hour shifts, five days per week. The facility has occupied the subject site since 2004. The facility is registered with NCDEQ as a small quantity generator of hazardous waste since 2014 although it appears to be operating as a conditionally exempt small quantity generator (CESQG). The twenty-acre site is occupied by one building approximately 150,000 square feet in size. There are twelve monitoring wells on the subject site which the owners identified as existing due to the fact that the property is a former Superfund site. The facility is serviced by municipal water and sewer. The distance to the nearest residence is less than two hundred yards and the distance to the nearest off site well is unknown. Activities at the site include rubber compounding using primarily oil, carbon black, and natural and synthetic rubber. The facility has an air quality permit, Air Permit No. 09590R04, permit class: small (Facility ID# 4200194).

The raw materials for manufacturing the rubber compound include carbon black, oil, and synthetic and natural rubber. All raw materials are received at the back of the plant in the unloading area. AirBoss uses a fully automated system for weighing and transporting materials. The carbon black material is moved using a dynamic air conveyance system which eliminates manual weighing errors and excessive handling. Oil for processing is stored in 250-gallon plastic totes and above ground storage tanks. The mixer line is composed of a fully automated master batch mixer with processes controlled in real time.

WASTE STREAMS INCLUDE:

The facility generates very little in the way of hazardous waste primarily limited to universal waste used batteries and used lamps. Used oil is generated in large quantity and recycled by Safety-Kleen, Raleigh NC. Rags containing almost exclusively used oil are managed by Safety-Kleen. Hydraulic fluid and some aerosol cans are generated. The facility has a parts washer, also serviced by Safety-Kleen, no solvent waste is ever stored as a result of the parts washer.

AREAS OF REVIEW AND INSPECTION:

Emergency Preparedness/Arrangements with Local Authorities:

The facility is operated to minimize possibility of fire, unplanned sudden or non-sudden release of used oil and other manufacturing constituents. The facility is covered by a wet fire suppression system and the Scotland Neck Fire Department visits on at least an annual basis. The plant regularly conducts fire and emergency drills. Fire extinguishers and spill kits are located throughout the plant.

Training Records:

Emergency responders who are plant employees receive regular training at Halifax Community College.

Manifests / LDR:

Bills of Lading from Safety-Kleen were reviewed and it was observed that no hazardous waste has been shipped from the facility with the exception of used lamps, used batteries, used oil and spent solvent.

Inspection Records (storage):

The facility does not have a hazardous waste storage area per se. Significant quantities of used oil are stored prior to shipment for recycle. Facility personnel frequently inspect the area though do not document inspections.

Areas inspected:

Receiving Area

In this area, raw materials including oil, carbon black and synthetic rubber for the rubber compounding process are received at the rear of the facility. AirBoss uses an automated system for weighing and

transporting material. Carbon Black is moved automatically using dynamic air conveyance system which eliminates manual weighing errors and excessive handling and also helps the plant operate cleanly and efficiently. The inspectors observed several 55 gallon containers containing used carbon black material in this area. According to Mr. Partain, 99.99% of used carbon black residues are collected in super-sac plastic bags and resold in the market. No hazardous waste was observed in this area. Also inspected was an area just outside the nearby exterior wall where new oil is loaded into the plant through a boxed, fully contained hose system. The facility also has two, seventy-five thousand-gallon above ground storage tanks for oil located on the southeast corner of the building inside of secondary containment Both areas was observed to be clean and free of any evidence of leaks or spills.

Shipping Area

The autopiler equipment takes finished strip material and piles it neatly on pallets or crates for shipment. This replaces the manual skid preparation and allows more product per skid. AirBoss has the ability to package their finished product based on weight or dimension. No hazardous waste was observed in this area.

QA/QC Laboratory

The laboratory is used for analyzing the physical properties and to conduct performance testing of the rubber compound material prior to sale. No chemicals are used in this laboratory. No hazardous waste was observed in this area. Off spec rubber is segregated for recycling at this point.

Used Oil Storage Area

Used oil is stored in 300 gallon totes inside the building in the receiving area. The inspectors noted four totes, eleven containers and three boxes containing nonhazardous sludge. According to Mr. Partain, nonhazardous sludge is generated through the lubrication of mechanical seals at the mixer. All used oil, sludge, and solids are picked up by Safety-Kleen Raleigh, NC.

Maintenance Shop

The maintenance shop is used for equipment repair, preventive maintenance and as a stock room for chemicals, parts, and supplies. According to plant maintenance personnel, the plant typically generates very few waste aerosol cans facility wide. The facility currently considers spent aerosol cans to be "RCRA" empty and disposes of them as solid waste once it is determined that there is no significant amount of liquid remaining in each can and that the can is at atmospheric pressure. The inspectors requested that the plant consider setting up a can puncturing device to ensure that there is never any question as to the proper dispensation of the spent aerosol cans. Once the aerosol cans are punctured, the empty cans may be recycled as scrap metal, further reducing the company's landfill footprint. The collected residue from the spent aerosols would then need to be managed as hazardous waste but would be considered a satellite accumulation area. On the day of the inspection, no hazardous waste was observed in the Maintenance Shop.

Universal Waste Storage Area

The inspectors noted a 1-gallon screw top poly bucket used for storing used batteries. The inspectors also observed one cardboard box containing universal waste used lamps. Both universal waste lamp and universal waste battery containers were observed properly closed and labeled. Recommend dating each container with the date the first battery or bulb was accumulated to ensure that universal waste is not accumulated for longer than one year.

Storage Areas:

The facility has no hazardous waste storage areas as no hazardous waste is typically generated. A large amount of used oil is stored prior to being shipped for recycling.

External Condition of Facility:

No adverse conditions observed.

WASTE MINIMIZATION:

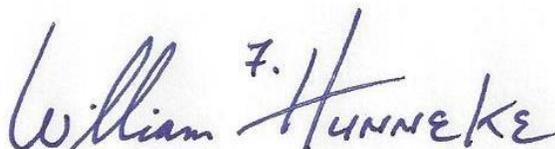
Use of process oil at the facility has continually dropped over the last ten years due to implementation of best practices and process controls. Airborne carbon black is captured through an extensive air handling system, recovered, and sold back into the market. Off specification rubber that has been recycled by the plant after four times around is sold on a secondary market. The facility recycles all cardboard, paper and consumer recyclables.

SITE DEFICIENCIES:

No site deficiencies were noted.

RECOMENDATIONS:

- Recommend the facility consider implementing a puncture station for spent aerosol cans. The punctured cans can be recycled as scrap metal further reducing the facilities landfill footprint. Collected residue from the spent aerosols would then need to be managed as hazardous waste but would be considered a satellite accumulation area.
- Recommend dating each container with the date the first battery or lamp is accumulated to ensure that universal waste is not accumulated for longer than one year.
- The facility may re-notify as a CEQSG if it continues to operate at current hazardous waste generation volumes.



William F. Hunneke
Environmental Senior Specialist, NCDEQ

April 15, 2016
Date

Copy of report provided to facility contact

Documents to be provided with report:

Tax certification forms, and assistance may be found at: <http://ncdenr.gov/web/wm/sw/taxcert>
8700-12 form and filing instructions