

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

**Facility ID Number:** NCD980841753

**Facility Name:** Altec Industries, Inc.

**Document Group:** Inspection/Investigation (I)

**Document Type:** I - Compliance Evaluation Inspection (CEI)

**File Description/Comments:** LQG - 3 violations noted. TNOV 2016-024 was issued.

**Date of Document:** 3/23/2016

**Author(s) of Document:** Phil Orozco

**Inspector Name:** Phil Orozco

**Suborganization:** Eastern Region

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

**For Violations:**

**Enforcement Date:** 4/28/2016

**Docket Number:** 2016-024

**Enforcement Type:** TNOV

**How many violations were there?** 3

**For IANOV or CO:** The facility is

**Outcome Measures for CSE for IANOV or CO:**

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

**Violation #1:**

**Date Determined:** 3/23/2016

**Scheduled Return to Compliance:** 6/1/2016

**Actual Return to Compliance:**

**Regulation Description:** 262.34(a)(4) - 265.16(c)

**Comment:** The annual refresher of hazardous waste management training was not conducted in 2015.

**For CSE, Corrections to Violations were:**

**Violation #2:**

**Date Determined:** 3/23/2016

**Scheduled Return to Compliance:** 6/1/2016

**Actual Return to Compliance:**

**Regulation Description:** 262.34(a)(4) – 265.16(d)(2)

**Comment:** The job description for Scott Cunningham, EH&S Manager, was not in compliance with the rules.

**For CSE, Corrections to Violations were:**

**Violation #3:**

**Date Determined:** 3/23/2016

**Scheduled Return to Compliance:** 6/1/2016      **Actual Return to Compliance:**

**Regulation Description:** 262.34(a)(4) - 265.53

**Comment:** The contingency plan had been revised in February, 2016, to note that Scott Cunningham became the new emergency coordinator. However, on the day of inspection the plan had not been sent to the required agencies.

**For CSE, Corrections to Violations were:**

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

**COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

**1. FACILITY INFORMATION:**

Name: **Altec Industries, Inc.**  
EPA ID Number: **NCD980841753**  
Type of Facility: Large Quantity Generator  
Facility Location: 1550 Aerial Ave.  
Creedmoor, NC 27522  
Telephone Number: (919) 528-8080  
County: Granville

**2. FACILITY CONTACT:** Scott Cunningham, EH&S Manager [Scott.Cunningham@altec.com](mailto:Scott.Cunningham@altec.com)  
Cell: 919-358-4847

**3. SURVEY PARTICIPANTS:** Scott Cunningham, Jan Nordcliff (919-528-8053); Phillip Orozco

**4. DATE OF INSPECTION:** **March 23, 2016**

**5. PURPOSE OF INSPECTION:** Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279. Previous CEIs were conducted on March 12, 2015, March 28, 2013, May 11, 2012, and September 23, 2011

**6. FACILITY DESCRIPTION:**

Altec Industries manufactures hydraulic lift trucks for use by utility companies. Operations at the facility consist of the fabrication and assembly of hydraulic booms, assembly of fabricated components and box beds onto truck chassis, and painting of completed trucks to customer specifications. The truck chassis, box beds and hydraulic components are manufactured off-site by a third party.

Manufacturing and assembly areas include steel cutting and sawing, welding, machining, fiberglass boom fabrication, metal prep, painting, component assembly, and component installation. After initial cutting, the steel is transferred to welding and machining areas located in the central portion of Building A. Operations in the machining area include milling, grinding, turning, and boring. Several of the milling and boring machines utilize water-based coolant liquids. The fiberglass boom manufacturing operations include fiberglass lay-up, resin mixing, boom curing, and sanding. The fiberglass booms are constructed by mechanically winding fiberglass resin and fiberglass reinforcement strands onto a steel mandrel. The completed fiberglass boom is then cured using a gas-fired curing oven. After curing, the booms are removed from the mandrels with a mechanical hydraulic stripper. The booms are then sanded and finished for painting.

**General Information:**

- Legal owner of business: Altec Industries, Inc.
- Legal owner of property: Altec Industries, Inc.
- Square footage of occupied space: approx. 171,000 sq. ft.
- Acreage: approx. 42 acres
- Operating shifts: 3
- Number of employees: 650

- List of waste streams (haz & non-haz):
  - Non-hazardous:** Common trash – paper, cardboard, non-haz materials.
  - Hazardous wastes:** Spent paint waste, spent acetone solvent, spent mixed solvent waste.
  - Regulated non-hazardous:** Used oil, coolant, oil dry/absorbent
  - Universal waste:** Fluorescent and metal halide bulbs, batteries, circuit boards
- Areas inspected : All satellite and hazardous waste storage areas, production areas,
- Water supply (municipal or well): Municipal - Town of Butner
- Municipal sewer/septic/on-site treatment facility: Municipal – Town of Butner
- Number of on-site wells : None
- Groundwater monitoring wells on-site: None
- Closest private residence : 0.33 miles

#### 7. HAZARDOUS WASTE STREAMS INCLUDE:

*Also refer to Item 6. - Facility Description above.*

Spent paint waste, spent acetone solvent, spent mixed solvent waste.

D001, D006, D008, D018 (Benzene)

F003 (paint related waste)

The fiberglass winding process generates a viscous solution of resin (EPON Resin 828) and cleaning compound/solvent that is managed as a D001/F003/F005 hazardous waste. The MSDS for the resin indicates a Flash Point (F.P.) of 480<sup>0</sup> F. and for the solvent a F.P. of 146<sup>o</sup> F. Altec chooses to manage this waste as a D001/F003/F005. An analytical sample of this cleaner was taken on 2/11/10. The results indicated a F.P. > 140<sup>o</sup> F. The HW is collected in a 55-gallon drum.

The spinning process also generates a non-hazardous resin (EPON Resin 828) plus activator waste. The liquid activator waste is collected in small buckets located at the end of the fiberglass winding machine. In the previous inspection in 2013, the material was then put into larger, 5-gallon closed container were it is allowed to set-up into a solid. Since the last inspection, it is now placed in a 55-gallon drum where it slowly sets-up and becomes a solid material. The solidified waste is non-hazardous.

Used oil is sent for recycling and is not considered a hazardous waste. Approximately, 500 gallons of used oil is generated per month. Noble Oil is the transporter and processor of this material.

#### 8. AREAS OF REVIEW AND INSPECTION:

< **Emergency Preparedness** - In order to better document compliance with 40 CFR 265.37, Altec has sent letters similar to those developed by the HW Section to the appropriate authorities. The letters were sent certified mail to the fire & police departments on 1/6/09 & to the regional hospital on 6/25/09. Green cards are on file.

< **Contingency Plan – Refer to deficiencies.**

Scott Cunningham is the primary emergency coordinator and Patrick Wooten is the alternate. The Contingency Plan was revised in February, 2016. However, on the day of the inspection it was became evident that it had not been sent to local authorities yet.

< **Inspection Records (storage) – Complete**

< **Job Descriptions – Refer to deficiencies.**

Altec maintains RCRA job descriptions by an assigned RCRA Task title. Persons are listed with their corresponding Altec job title under specific task titles. Duties, qualifications and training requirements are described under each task title. It was noted in last year’s inspection report that the job description for Scott Cunningham was in the process of being written. However, it had not been completed and was not available at the time of inspection.

< **Training – Refer to deficiencies.**

A large number of employees are trained and can be called upon to carry out HW duties if the need arises. HW management training was given on March 19 & 20, 2013; November 20, 2014 and in March, 2016. The in-house hazardous waste management – CCL training was not conducted in 2015. Documentation for dates of completion of other related training modules are maintained on file at Altec.

< **Manifests / LDR** – Complete. Tokso Pak, Jan Nordcliff and Scott Cunningham are allowed to sign the manifests.< **Transporters:**

Clean Safe Technologies Inc. MDR000526798  
CTW Specialties Inc. NCR000143537

< **TSD's:**

Ecoflo NCD 980 842 132  
Giant Resource Recovery ALD 070 513 767  
Giant Resource Recovery – Sumter SCD 036 275 626

< **Satellite Accumulation Areas (SAAs):**

Building 'A' Paint Booth – One 55-gallon container is stored in a flammable material storage cabinet.

Building 'A' Leveling Rods - One 55-gallon container in a flammable material storage cabinet. Not inspected on this day.

Building 'A' Aerosol Cans - One 55-gallon container is stored in a flammable materials storage cabinet. The drum has a can puncture device attached to it.

Building 'B' Paint Locker – Two 55-gallon containers. In the past, three containers were used but now the solvent from cleaning out paint guns and unwanted/unusable paint are combined into one drum. The other drum contains solvent contaminated wipes. This drum is now in a cabinet that is part of a compactor.

Building 'B' Aerosol Cans – One 55-gallon container in a flammable material storage cabinet. The drum has a can puncture device attached to it.

Winding Area – One 55-gallon drum holding resin + cleaner; and one or more 5-gallon container holding non-hazardous resin + activator

< **Storage Areas:**

HW Storage Area - located outside Bldg. 'A' near the loading dock.

Universal Waste – Lamps are stored in a room between the office space and the manufacturing floor.

A Used Oil storage pad is located outside at the back of the area where new trucks are being staged prior to delivery. This area was not inspected on this day.

**External Condition of Facility:** No adverse conditions were observed.

9. **WASTE MINIMIZATION:** The Waste Management Plan dated 2/14/13 includes waste minimization efforts. Altec maintains the best possible operating practices to minimize all waste.

10. **SITE DEFICIENCIES:**

- i. **40 CFR 262.34(a)(4) - 265.16(c)** states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section. Hazardous waste management training was given on March 19 & 20, 2013; November 20, 2014 and in March, 2016. The in-house hazardous waste management (CCL) training was not conducted in 2015.

- ii. **40 CFR 262.34(a)(4) – 265.16(d)(2)** states that the job descriptions must describe the hazardous waste management duties of personnel involved in the hazardous waste management program. The job description must also include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position. It was noted in last year's inspection report that the job description for Scott Cunningham, EH&S Manager, was in the process of being written. However, it had not been completed and was not available at the time of inspection. Scott Cunningham is the EH&S Manager and emergency coordinator.
  
- iii. **40 CFR 262.34(a)(4) - 265.53** states that a copy of the contingency plan and all revisions to the plan must be maintained at the facility and submitted to all local police and fire departments, hospitals and local emergency response teams that may be called upon to provide emergency services. Altec's plan had been revised in February, 2016, to note that Scott Cunningham became the new emergency coordinator. However, on the day of inspection the plan had not been sent to the required agencies.

  
Phillip G. Orozco

Environmental Senior Specialist, NCDEQ

**Date: April 27, 2016**

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