

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

Your Name: Ernest Lawrence

Facility ID Number: NCD071561864

Facility Name: The Sherwin-Williams Company

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Suborganization: Western Region

County (if not on report): Guilford



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Secretary

1. FACILITY INFORMATION:

Facility Name: The Sherwin-Williams Company
EPA ID Number: NCD071561864
Type of Facility: LQG
Facility Location: 113 Stagecoach Trail, Greensboro NC 27409
Telephone Number: 336-292-3000

2. FACILITY CONTACT: Justin Sergent, EHS

3. DATE OF INSPECTION: August 8, 2016

4. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279. Last inspection performed June 5, 2013

5. FACILITY DESCRIPTION:

The Sherwin-Williams Company located at 113 Stage Coach Trail in Greensboro manufactures chemical coatings for wood including stains and top coats. The process includes mixing, blending and packaging various chemical compounds to produce the desired finishing materials.

The Sherwin-Williams Company began operation at this site in 1966. The property shows 13.47 acres. The facility is made up of two buildings. The Main Plant (150,000 square foot) building houses office, warehouse space, a quality assurance laboratory and manufacturing operations. The second building (25,000 square feet) houses the Global Wood Lab and Color Design Studio. The facility operates twenty hours a day, four days a week with approximately 75 employees. There are no reported wells onsite.

6. WASTE STREAMS INCLUDE:

Hazardous waste is generated from the process of cleaning tanks and equipment and from aged finished goods that cannot be reworked into product. The following hazardous waste streams are generated on site:

UN1993 Waste paint related material, (Toluene) [D001/F003/F005]

UN1325 Waste flammable solids, Organic, (Toluene, Acetone)[D001/D007/D035/F003]

UN1263 Waste Paint & waste related material [D001/D035/F003/F005]

UN1950 Waste Aerosols, flammable [D001, D035]

Used mops which were previously disposed are laundered returned to the facility.

Universal waste lamps and batteries are also managed on site and recycled by Veolia Environmental Services Recycle Pak.

7. AREAS OF REVIEW AND INSPECTION:

- **Emergency Preparedness and Prevention:** The facility operates and maintains the facility to minimize the possibility of fire or any unplanned sudden or non-sudden release of hazardous waste that could threaten health or the environment. The facility has an internal alarm that provides emergency instruction to personnel in the event of an emergency. Facility personnel who handle hazardous waste in the storage area have two way radios to summon emergency assistance if necessary. The facility has fire extinguishers and spill control equipment available near the hazardous waste storage area. The facility maintains twenty four inches of aisle space in the hazardous waste storage area. Arrangements have been made with the local emergency authorities to familiarize them with the facility and the hazardous waste handled at the facility.
- **Contingency Plan:** The facility maintains a contingency plan on site that describes the actions personnel must take to respond to an emergency. The contingency plan describes arrangements with police, fire and local hospital. The plan describes the signal used to begin evacuation of the facility. The names, addresses (both home and work) and phone numbers (both home and work) of the emergency coordinators are listed. The plan includes a description of the emergency equipment including the location of the equipment and a brief description of the capabilities of the equipment. The contingency plan shows primary and alternate evacuation routes. The contingency plan was last revised June 28, 2016. Revisions were submitted to the local authorities.
- **Inspection Records:** Inspections of the less than 90 day storage area are performed on a weekly basis and are logged on a form. Inspections of the hazardous waste tanks are performed, as required, daily on operation days.
- **Manifests / LDR:** Manifests for the year 2014, 15, and 16 were reviewed and were in good order complete with signed copies. Land ban notifications were also reviewed and found to be complete. Transporters and TSDs include:

Transporters:	Freehold Cartage Inc	NJD054126164
TSD's:	Giant Resource Recovery	SCD036275626
- **Training Records:** The RCRA training events reviewed were March 5, 2016 and February 5, 2015. RCRA training included hazardous waste identification, use and management of containers, labeling, accumulation area requirements, emergency procedures, contingency plan review, spill response and clean-up. The facility maintains job titles (HW Coordinator, Waste Supervisor, and Waste Handler) and descriptions that describe hazardous waste management duties.
- **Biennial Report:** The biennial report was submitted as required. The facility maintains a copy of the report on site.
- **Waste Minimization Plan or On-site Efforts:** The facility has an on-site distillation unit to recycle solvents. Off-specification materials are reworked into product.

- **Accumulation Areas:** The satellite accumulation areas that were observed during the inspection are described as follows. All were in compliance.
 - a) **UV Manufacturing:** There are three 55-gallon satellite accumulation areas for the accumulation of waste paint filters (solids) and solvent waste (liquids).
 - b) **Small Batch:** Two areas, each with a 55-gallon container.
 - c) **Mezzanine:** One 55-gallon container used for the accumulation of dirty solvent.
 - d) **QA Laboratory:** Two areas, each with a 55-gallon container.
 - e) **Small Can Filling Area:** Two areas, each with a 55-gallon container (filters, aerosols)
 - f) **Filling Area:** There are several 55-gallon satellite accumulation areas located in the Filling Area and are used for the accumulation of paint filters, dirty solvent, and paint sludge.
 - g) **Global Wood Lab, Raw Material Storage:** Two 55-gallon containers are used in this area. One container is used for the accumulation of waste filters and for other solids and one container is used for the accumulation of waste liquids. Both of these containers were labeled and the facility changed the funnel and the ring bolt to ensure that the containers were securely closed. In a separate area there is one 55-gallon container of solvent waste.

- **Storage Areas:**
 - Hazardous Waste Storage Areas:** The facility has three less than 90 day storage areas. They are described as follows:
 - Container Storage Area:** This storage area is located outside, behind the Main Plant. The storage area is on a concrete pad that is bermed. The property is fenced which secures the containers. The storage area meets all emergency preparedness and prevention requirements. On the day of the inspection, there were eighty (80) 55-gallon containers of hazardous waste in the storage area. All of the containers were observed in compliance. The earliest starting accumulation date was 6/16/16.
 - Hazardous Waste Tank (ST6):** This 6500 gallon tank is located outside, near the Main Plant and is a feed tank for dirty solvent to the distillation unit.

Hazardous Waste Tank (ST21): This 6500 gallon tank is located outside, near the Main Plant and is used for the distillation bottoms generated from the distillation unit.

Hazardous Waste Tank Compliance

Daily inspections were done in 2014-16.
Annual leak detection test was done
Tank integrity test initially done
Equipment list on site
Conservation valves operational

Universal Waste Storage Area: Universal waste lamps and batteries are stored in the maintenance area of the Main Plant. On the day of the inspection, there were five boxes of universal waste. All of the containers were closed and labeled.

- 8. **SITE DEFICIENCIES:** There were no deficiencies noted during the August 8, 2016 Compliance Evaluation Inspection.

- 9. **RECOMENDATIONS:** There were no recommendations offered as part of the Compliance Evaluation Inspection conducted August 8, 2016.



8/8/2016

Copy sent to facility

RCRA Inspector

Date

Facility Contact