

Hazardous Waste Section  
File Room Document Transmittal Sheet

Your Name: Kelly Galantis  
EPA ID: NCD079059192  
Facility Name: Buckeye Fire Equipment  
Document Group: Enforcement (E)  
Document Type: Correspondence (C)  
Description:  
Date of Doc: 7/14/2016  
Author of Doc: Gerald Culp

**File Room Use Only**

Date Recieved by File Room:

Date Scanned:

Month	Day	Year
8	23	2016
8	23	2016

NCD079059192

Scanner's Initials:





July 14, 2016

Julie S. Woosley  
Chief  
Hazardous Waste Section  
Div. of Waste Management  
217 W. Jones Street  
1646 Mail Service Center  
Raleigh, NC 27699-1646

RECEIVED  
2016  
Hazardous  
Waste Section

To: Ms. Woosley

As required by the Settlement Agreement in Buckeye Fire Equipment Co. v. NC DEQ 16 EHR 02790, Buckeye Fire Equipment identifies the solid waste streams it generates and disposes offsite. Please see the attached spreadsheet for applicable waste stream details.

We have established a waste stream committee, with a common goal of good corporate environmental stewardship, and will move forward with the TCLP testing of applicable waste streams as agreed.

Sincerely,

A handwritten signature in black ink that reads "Gerald W. Culp".

Gerald Culp  
Plant Manager  
Buckeye Fire Eq. Co.



# Waste Stream Mgt.

7 3 As requested, the following is a list of all waste Streams disposed of Off-Site. 7/14/2016

Waste LOC	Process	CHEMICAL SPECIFICATIONS	Need TCLP	NEW Stream	Comments	Action Items	Haz. W. Codes	Mtrl?
1 Anod	ALKALINE CLEANER	U.S. SPECIALTY 740	1	n/a	Historically Non Hazardous Process	Conduct TCLP	TBD	Sludge
2 Anod	ETCH	CAUSTIC 50%	1	n/a	Historically Non Hazardous Process	Conduct TCLP	TBD	Sludge
3 Anod	COLOR SEAL	U.S. SPECIALTY MLT 1-10% BY VOL.	1	n/a	Historically Non Hazardous Process	Conduct TCLP	TBD	Sludge
4 DDI Press	Metal Extrusion	Oil, water, & Stearate lube (1%)	n/a	n/a	PAR Lab results received 6/14/16> TCLP Metals were Negative.	Complete a Waste Characterization	Non Haz	Sludge
5 Phos	ALKALINE CLEANER	B-R 5512	1	n/a	Historically Non Hazardous Process	Conduct TCLP	TBD	Sludge
6 Phos	Phosphate	Dubois CWR2	1	n/a	99% of all US Phosphate processes are Non-Hazardous	Conduct TCLP	TBD	Sludge

Phosphate bath, waste #7 below, has been classified as Non-Haz liquid via EPA 200.7 testing on two different sample events.

7 Phos	Phosphate	Dubois CWR2 1.5%	n/a	n/a	High Zinc Bath, EPA 200.7 results on two different samples were Non-Haz for "RCRA 8" and pH.	Complete a Waste Characterization	Non Haz	Liquid
--------	-----------	------------------	-----	-----	--	-----------------------------------	---------	--------

Both waste streams, #8 + #9, have historically been treated as D001 Hazardous waste. We abide by our D001 characterization going forward.

8 Lab	LAB	Cyclohexane Solution	n/a	n/a	Historically Handled as D001 Flammable Waste	Complete a Waste Characterization	D001	Liquid
9 DOT/Tk	DOT/Tank	Paint waste	n/a	n/a	Historically Handled as D001 Flammable Waste	Complete a Waste Characterization	D001	Liquid

Waste stream #10, #11, and #12 below, are non-hazardous processes or virgin product. See action items for individual protocol.

10 MS	Stamping & Cutting	Oil & Water	n/a	n/a	Investigating oil separation processes for oil and water, thereby enabling waste minimization.	Complete a Feasibility Study by 3rd qtr.	Non Haz	Liquid
11 MS	OIL DRY	Oil Absorbent	n/a	n/a	Historically Non Hazardous Process, but not landfilled due to the oil	Continue Protocol	Non Haz	Solids
12 Paint	Powder Coating	Non Haz Paint Pdr too moist to run	n/a	n/a	Supplier recommends Landfill disposal of moist virgin powder. Nonhazardous product should not need TCLP	See if the supplier will take back product	Non Haz	Powder

All three Waste stream #13, #14, and #15 below, are NEW wastes to be sent off-site. See action items for individual protocol.

13	Anod	BRIGHT DIP and Bright Dip Rinse	1	1	PAR LAB TCLP sampled 6/6/2016, TCLP positive for Chromium at 11.3 ppm(D007), and low pH 1.07(D002)	Complete a Waste Characterization	D001 D007	Sludge
	Dike	Utility Decanting Tank				Process Haz Shipment by 8/5/16 (90 days)		
14	Anod	ANODIZE	1	1	Historically processed via Waste Treatment, however, we now filter out solids and will process after TCLP accordingly	Conduct TCLP	TBD	Solid
15	Phos	C-Lube	n/a	1	Tested via EPA 200.7 to be non hazardous. Landfill applicable	Complete a Waste Characterization	n/a	Solid