

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

Your Name: Jeff Menzel

Facility ID Number: NCD091249417

Facility Name: Former Deere & Company (Textron, Inc.)

Document Group: Inspection/Investigation (I)

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County (if not on report): Gaston



**NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH**

RCRA INSPECTION REPORT

1. **Facility Information:** Former Deere & Company (Textron, Inc.)
Little Mountain Road (3800 block)
Gastonia, N.C. 28053
EPA ID#: **NCD091249417, TSD Facility**

2. **Facility Contact:** Jon Wakeman, AECOM Technician
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3. **Inspector(s):** Jeff Menzel NCDEQ, Sean Morris NCDEQ

4. **Date of Evaluation:** July 15, 2016
Arrived: 10:00am Departed 2:30pm

5. **Date of Report:** August 22, 2016 – Prepared by: Jeff Menzel

6. **Facility Description:**

On July 15, 2016, a compliance inspection was conducted at the Former John Deere Consumer Products Facility / Former Homelite facility located in Gastonia, NC off of Little Mountain Road (3800 Block). Sean Morris with NCDEW HWS and Jon Wakeman with AECOM were present at the time of the inspection. The property is currently owned by Schwartz Properties, LLC based out of Asheboro, NC. There are two large buildings on the property and portions of each building are currently being leased to several companies. The property is approximately 60-acres in size. The property is bordered by residential areas south and west of the property.

The site is operating under Hazardous Waste Management Permit NCD091249417-R1 (Permit), which was last issued in 2007. The Permit and subsequent Part B Application, which lists corrective action & post closure requirements, are being managed by Textron, Inc., which has been identified as the site's responsible party. Textron has contracted with AECOM (formally ENSR Corporation) to manage the operation and maintenance of post closure & corrective action Permit requirements. AECOM's Project Manager for the site is currently Ms. Erin Stewart.

There are three RCRA permitted Hazardous Waste Management Units (HWMUs) and twenty-seven Solid Waste Management Units (SWMUs) currently identified on the property. HWMU #1 is an area, located in front of the west facing building, where a former MEK underground storage tank (UST) was removed, HWMU #2 is located a couple hundred feet southeast of HWMU#1 and was the location of former above ground chemical storage tanks and HWMU #3, which is located in the northeast corner of the property, is a former magnesium burn pit. Groundwater contamination, primarily consisting of chlorinated organics, has been confirmed at the site and is suspected to have

been caused by the operation of the HWMUs listed above.

In early 2011 Textron contracted the installation of a new groundwater extraction and treatment system (GWE system) using existing groundwater extraction wells from the previous groundwater treatment system. The new system began operation in April 2011. There is also a Soil Vapor Extraction (SVE) system in operation on the property.

Routine operation and maintenance of the new groundwater extraction and treatment system generates used filter bags. The used filter bags are managed as F001 hazardous waste. Each used filter bag weighs approximately one pound. AECOM personnel conduct the filter change outs and have shipped one container of F001 hazardous waste solids, to Clean Harbors Deer Park facility (TXD055141378), since the new GWE system began operation. Based on the amount of hazardous waste bag filters generated, the facility operates as a conditionally exempt small quantity generator (CESQG).

7. **Waste Streams:**

Wastes Generated: hazardous or regulated waste streams generated on-site:

F001 – hazardous waste liquids

F001 – hazardous waste solids / debris

8. **Document Review:**

Required Onsite Documents & GW Monitoring Requirements:

The facility had all required Hazardous Waste Permit & Post Closure documents onsite. AECOM maintains a mobile trailer, near HWMU #3, to maintain documents onsite but some documents are also maintained on Mr. Wakeman's laptop computer. There was also a required contingency plan onsite which designates Jon Wakeman as the primary emergency coordinator and Ms. Erin Stewart as the alternate coordinator (See Comment Section). The facility is required to conduct annual groundwater sampling and to submit an Annual Monitoring & Remedial System Effectiveness Report. The most recent Annual Monitoring & Remedial System Effectiveness Report was onsite and the last groundwater sampling event was conducted in June 2016. Mr. Wakeman sampled 36-monitoring wells & NPDES outfall. The facility Permit requires that an annual inspection for erosion, landfill cap cover, drainage, subsidence, security, and monitoring well condition be conducted on HWMUs 1-3 by a professional engineer (PE). The most recent annual inspection was conducted by Christopher Brownfield, P.E. with AECOM in January 2016. Mr. Wakeman is completing required weekly & monthly inspection checklists and copies were reviewed at the time of the inspection. We also reviewed training requirements listed in the Permit.

The facility's financial assurance information was submitted on February 16, 2016 and lists a Post Closure & Corrective Action cost estimate of \$3,424,492.00. Financial assurance is maintained by Financial Test.

9. **Facility Walkthrough:**

Groundwater Extraction System (GWE) & Soil Vapor Extraction System (SVE):

The GWE system (EZ Tray) currently utilizes eight extraction wells located at various locations. The treatment system utilizes an air stripper, which is housed in a metal trailer (GWE Building) on the southeast side of the property. Groundwater from the eight extraction wells is pumped through underground piping to unions connected to three main influent groundwater pipes that lead to the GWE treatment unit. Groundwater is pumped into an approximately 250-gallon poly holding tank within the GWE Building. The water is then forced through one of two 25-micron filter units to remove suspended solids. After filtration, VOC removal begins when groundwater enters the air stripper unit, which is comprised of four horizontal trays used to circulate water based on air pressure variations and agitation. The volatile organic gases, removed from the air stripper, are then vented to the atmosphere through piping on top of the treatment building. The groundwater does not currently go through any type of pretreatment prior to entering the air stripper. The treated water is finally pumped to the northeast portion of the property where it is discharged to the Crowder's Creek under the regulation of the facility's NPDES Permit, which allows the discharge of up to 125,000 gallons per day. The EZ Tray system has the capacity to treat up to 55,000-gallons of groundwater per day. The treatment system's conveyance piping is connected to eight ground vault flow meters that transmit wireless flow readings to the operator. The SCADA type monitoring system ensures proper system operation and is capable of

alerting the operator of potential problems with the system including leak detection.

There is also a SVE system in operation on the property. The SVE system enclosure is located near the EZ Tray building. The SVE system utilizes seven groundwater extraction wells, which are located in one of two specific zones on the south portion of the property, and organic vapors extracted from the wells are discharged to the atmosphere. The knockout drum should be replaced as needed.

Jon Wakeman is the operator in responsible charge (ORC) for the GWE treatment system. Mr. Wakeman conducts routine maintenance, operation and monitoring of the systems. The EZ Tray system uses two 25-micron filters that utilize filter bags that must be changed out on a regular basis. The filter bags are accumulated in a 55-gallon container, being stored in the GWE system trailer. The filters are managed as F001 hazardous waste. There was one 55-gallon container of F001 spent filters onsite and the container was properly closed and labeled at the time of the inspection.

Hazardous Waste Management Unit Visual Inspection:

During the inspection we visited HWMU #1, #2, and #3. Several monitoring wells (MW) were inspected and were found to be properly locked. HWMUs #1 & #2 appeared to be in good condition with adequate cover, no erosion, and proper drainage observed.

AECOM personnel are conducting landscaping maintenance activities, which includes mowing of each HWMU landfill cap, controlling vegetative growth on cap side walls and fence maintenance. All three HWMUs are fenced and locked to prevent unauthorized access and warning signs are posted on the fencing.

10. **Comments:**

It is reminder that documentation must be available onsite to demonstrate that revisions to the Operation, Maintenance & Contingency Plan Report have been submitted to all required local authorities. Records demonstrating completion of 40-hour HazWoper refresher training & contingency plan training must also be available for onsite review. Training requirements for personnel involved with operation/management of RCRA Permit related activities is listed within the Operation, Maintenance & Contingency Plan Report, Revision 5, Section 10.

11. **Site Deficiencies:**

No violations of applicable regulations were observed during this inspection.



JEFF MENZEL/ 8/22/2016
NC HWS-COMPLIANCE BRANCH

SENT BY ELECTRONIC MAIL
Greg Simpson

cc:
Sean Morris, Western Compliance Branch Supervisor
Central Office Files