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DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

Your Name: Sean Morris

Document Category: Facility

Document Group: Inspection/Investigation

Document Type: Complaint Investigation (CMP)

EPA ID: NCS000002335

Facility Name/Subject: Grayson O Company

Document Date: 10/03/2016

Description:

Complaint Investigation w/ No Violations

Author: Sean Morris

Branch/Unit: Compliance Branch-Western Region

Facility/Site Address: 6509 Newell Ave.

Facility/Site City: Kannapolis, NC 28082

Facility/Site State: North Carolina

Facility/Site Zipcode: 28082

Facility/Site County: Rowan

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

RCRA INSPECTION REPORT

1. **Facility Information:** Grayson O Company (Go-Laboratories)
6509 Newell Ave.
Kannapolis, NC 28082
State Assigned EPA ID#: NCS 000 002 335

P.O. Box 278
Kannapolis, NC 28082
2. **Facility Contact:** Mr. Ron McLamb, Grayson O Company-Plant Manager
Phone: 704.932.6195 Email: ron.mclamb@go-labs.com
3. **Inspector(s):** Mr. Sean Morris, HWS-Western Unit Regional Supervisor
4. **Survey Participants:** Mr. Ron McLamb, Grayson O Company-Plant Manager
Ms. Joanne McLamb, Grayson O Company-Manager
Mr. Mark Ragan, Grayson O Company-Technical Director
5. **Date/Time of Inspection:** March 9, 2016 / Arrived: 1:25pm Departed: 4:50pm

Date of Report: October 3, 2016 – Prepared By: Sean Morris
6. **Purpose of Inspection:** Complaint Investigation
7. **Report:**

On February 5, 2016 a complaint referral was received from Teresa Bradford, with the NC Solid Waste Section, regarding an illegal solid waste disposal site (Sykes property) being investigated in Mooresville, NC. Ms. Bradford explained that she had recently received a complaint regarding the accumulation of 55-gallon containers on the Sykes property from a concerned citizen. Ms. Bradford explained that there were multiple 55-gallon containers on the Sykes property and that the owner, Mr. Roy Sykes, stated that he collects empty 55-gallon containers from a company in Kannapolis and transports them to his property so that he can sell/use the containers for "burn barrels". Ms. Bradford explained that throughout her investigation she had not found any containers holding material but several of the containers still had product labels affixed, including labels indicating that they previously held flammable liquids (DOT Class 3 labels). Although Mr. Sykes didn't provide the name of the company from which he collects the containers, digital photographs taken by Ms. Bradford provided enough information to suggest that containers had originated from a company named Go-Laboratories (operating as Grayson O Company).

On March 9, 2016 I conducted a site visit at Grayson O Company to inspect the facility's empty chemical container management procedure. Upon arrival I met with Mr. Mark Ragan, Grayson O Company-Technical Director, and explained the reason for the visit. Mr. Ragan facilitated access to relevant records and visual inspection of facility processes.

Grayson O Company (Grayson) began operations at the Kannapolis facility in 1993 and operates a blending process for the production of hair care products. The facility also packages finished products for sale to distributors. The facility is located on a ~30-acre tract with one main production building that is ~65,000 square feet in size. The facility currently has approximately ~50 employees working 1-shift, 5-days a week. The facility is located next to residential areas and is connected to on water supply well used for production purposes. The facility is also connected to municipal POTW for water and sewer services.

Hazardous Waste & Empty Container Management:

A visual inspection of the facility was conducted during the visit. The facility disposed of several 55-gallon containers of waste alcohols in 2012 and 2013 but is currently not generating this type of waste. Hazardous waste manifests were onsite and reviewed during the visit. The facility does generate a small amount of used lacquer thinner from cleaning of small label printers but personnel explained that used thinner evaporates during the cleaning. The facility appeared to be operating as a conditionally exempt small quantity generator at the time of the inspection (See Comment Section).

Facility personnel stage empty containers inside, next to the facility's loading dock, bay door. There were eleven metal 55-gallon containers and forty plastic 55-gallon containers staged in the area. The containers were confirmed to be empty during the visit. Facility personnel explained that Mr. Roy Sykes had collected empty 55-gallon containers in the past and that Mr. Sykes signed an agreement on 2/1/12 to collect the containers. Facility personal also stated that some of the empty plastic containers are owned and returned to vendors such as Univar. The facility also provides empty containers to Cardinal Containers for refurbishing and maintains receipts for empty container collections.

Complaint Allegations:

Based on the information obtained during the complaint investigation, there was not any evidence to suggest that Mr. Sykes had obtained any non-empty chemical containers. I advised facility personnel of their potential liability for chemical containers discovered off-site. No additional action needed at this time.

8. Comments:

- It is a reminder that if the facility generates more than 220-pounds of total hazardous waste in any calendar month or accumulates more than a total of 2,200-pounds of hazardous waste onsite at any one time, the facility would be subject to small quantity generator (SQG) regulatory requirements. Facilities that generate more than 2,200-pounds of total hazardous waste in any calendar month or accumulates more than a total of 2.2-pounds of P-Listed hazardous waste onsite at any one time, the facility would be subject to large quantity generator (LQG) fees and regulatory requirements. Both SQGs and LQGs are required to submit a hazardous waste notification form to obtain a site identification number. Additional hazardous waste management guidance can be found at:

<http://deq.nc.gov/about/divisions/waste-management/hazardous-waste-section>



10/3/2016

SEAN MORRIS / DATE
NC HWS-COMPLIANCE BRANCH

SENT BY EMAIL
FACILITY CONTACT

cc:
Central Office Files

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