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Site Name (Subject): SQUIBB E R & SONS

Site ID (Document ID): NCD991278730

Document Name (DocType): Preliminary Assessment/Site Inspection (PA/SI)

Report Segment:  
Description: Preliminary Assessment

Date of Document: 12/19/1985

Date Received:

Box: *Enter SF and # with no spaces* SF10,624

Access Level: PUBLIC

Division: WASTE MANAGEMENT

Section: SUPERFUND

Program (Document Group): SERB (SERB)

Document Category: FACILITY

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**PRELIMINARY ASSESSMENT**

**E. R. Squibb and Sons**

**Kenly, Johnston County, North Carolina**

**NCD 991 278 730**

**December 1985**



North Carolina Department of Human Resources  
Division of Health Services  
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.  
State Health Director

December 19, 1985

Ms. Denise Bland  
EPA NC CERCLA Project Officer  
Air and Hazardous Material Division  
345 Courtland Street, N.E.  
Atlanta, GA 30365

**CERCLA**

Re: E.R. Squibb and Sons/NC D991278730  
Flowers Rd.  
Kenly, Johnston County, NC

Dear Ms. Bland:

Enclosed please find the Preliminary Assessment report for the subject site. This priority is based on review of available data.

Squibb is a new facility which commenced operation in 1978. The facility receives bulk shipments of unfinished penicillin, which it processes to such finished forms as tablets, capsules, and powders. Squibb generates halogenated and non-halogenated solvents at a rate of 125,000 lbs./yr. This waste is stored in tanks and drums and manifested off-site every 90 days, as required for large generators. At present this waste is being handled by Seaboard Chemical Company of Jamestown, NC; in the past, Squibb is known to have directed their wastes to both, Carochem in Durham, NC, and the Squibb facility in Brunswick, NJ.

Until January 18, 1982, Squibb stored butyl alcohol in a 4000 gallon underground storage tank. Presently, fuel oil is the only substance stored in underground storage tanks at the site.

Squibb generates wastewater at a rate of 5,000 to 15,000 GPD. The company aerates this wastewater in a concrete tank, prior to discharging it to the city sewer.

Ms. Denise Bland  
Page 2

According to Bill Pharr, plant manager at Squibb, the plant uses water supplied by the city of Smithfield. He believes that local residents also depend on city water, and reports that he knows of no nearby wells. The nearest home, he says, is located about 0.5 miles from the facility.

No on-site disposal, spills, or releases have occurred at Squibb, according to Mr. Pharr. Based on the available data, it appears that this site poses no threat to human health or environment. Priority assigned is Low.

References are:

1. Files at the NC Solid and Hazardous Waste Mgmt. Branch, Raleigh, NC.
2. Bill Pharr, Plant Engineer at Squibb, in Kenly, NC, personal communications, 12-3-85.

On 19 December 1985, this Preliminary Assessment was reviewed by CERCLA Unit personnel and by the following representatives from the North Carolina Department of Natural Resources and Community Development, Division of Environmental Management: Fay Sweat, Groundwater Section and Glen Ross, Air Quality Section.

If you have any questions, please call me at (919) 733-2178.

Sincerely,

*D. Mark Durway*

D. Mark Durway, Geologist  
Solid and Hazardous Waste Management Branch  
Environmental Health Section

DMD/lw/0234b



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION  
01 STATE 02 SITE NUMBER  
NC D991278730

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) E.R. Squibb and Sons		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER Flowers Road			
03 CITY Kenly	04 STATE NC	05 ZIP CODE 27542	06 COUNTY Johnston	07 COUNTY CODE 51	08 CONG DIST 2
09 COORDINATES LATITUDE 35° 35' 09"		LONGITUDE 78° 08' 27"			

10 DIRECTIONS TO SITE (Starting from nearest public road)  
The Squibb facility is situated on a 97 acre property on Flowers Road immediately off I-95. This location is approximately 0.5 miles SW of Kenly.

III. RESPONSIBLE PARTIES

01 OWNER (if known) E.R. Squibb and Sons		02 STREET (Business, mailing, residential) P.O. Box 4000			
03 CITY Princeton	04 STATE NJ	05 ZIP CODE 08540	06 TELEPHONE NUMBER (609) 921-4000		
07 OPERATOR (if known and different from owner) E.R. Squibb and Sons		08 STREET (Business, mailing, residential) P.O. Box 1000			
09 CITY Kenly	10 STATE NC	11 ZIP CODE 27542	12 TELEPHONE NUMBER (919) 284-5131		

13 TYPE OF OWNERSHIP (Check one)  
 A. PRIVATE     B. FEDERAL: \_\_\_\_\_ (Agency name)     C. STATE     D. COUNTY     E. MUNICIPAL  
 F. OTHER: \_\_\_\_\_ (Specify)     G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)  
 A. RCRA \_\_\_\_\_ DATE RECEIVED: 11 13 80     B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: \_\_\_\_/\_\_\_\_/\_\_\_\_     C. NONE  
 Part A    MONTH DAY YEAR    MONTH DAY YEAR

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY (Check all that apply)  
 YES    DATE \_\_\_\_/\_\_\_\_/\_\_\_\_     A. EPA     B. EPA CONTRACTOR     C. STATE     D. OTHER CONTRACTOR  
 NO    MONTH DAY YEAR     E. LOCAL HEALTH OFFICIAL     F. OTHER: \_\_\_\_\_ (Specify)  
 CONTRACTOR NAME(S): \_\_\_\_\_

02 SITE STATUS (Check one)    03 YEARS OF OPERATION  
 A. ACTIVE     B. INACTIVE     C. UNKNOWN    1978     UNKNOWN  
 BEGINNING YEAR    ENDING YEAR

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED  
Facility receives bulk shipments of unfinished penicillin, which it processes to such finished forms as tablets, capsules, and powders. Squibb is a new plant, situated on a 97 acre property, which prior to 1978, was used for farming. Squibb generates halogenated and non-halogenated solvents at a rate of 125,000 lbs/yr. Waste is stored

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION  
in tanks and drums and manifested off-site every 90 days, as required for large generators. Facility had a 4000 gallon underground storage tank for butyl alcohol; this unit remains in place, but was closed 1-18-82. Presently the only substance stored underground is fuel oil. Squibb uses city water, as do local residents, the nearest of which is located

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)  
 A. HIGH (Inspection required promptly)     B. MEDIUM (Inspection required)     C. LOW (Inspect on time available basis)     D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Bill Pharr, Plant Eng.		02 OF (Agency/Organization) Squibb - Kenly, NC		03 TELEPHONE NUMBER 919 284-5131	
04 PERSON RESPONSIBLE FOR ASSESSMENT Durway/Crosby		05 AGENCY NC DHR/DHS	06 ORGANIZATION SHW Mgmt. Br.	07 TELEPHONE NUMBER '919' 733-2178	08 DATE 12 / 03 / 85 MONTH DAY YEAR

EPA FORM 2070-12 (7-81) about 0.5 miles away. Bill Pharr, plant eng., and records at this office indicate that no releases have occurred which would pose a threat to human health or the environment.



**POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 2 - WASTE INFORMATION**

**I. IDENTIFICATION**

01 STATE NC	02 SITE NUMBER D991278730
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**II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS**

<b>01 PHYSICAL STATES (Check all that apply)</b> <input type="checkbox"/> A. SOLID <input type="checkbox"/> B. POWDER, FINES <input type="checkbox"/> C. SLUDGE <input type="checkbox"/> D. OTHER _____ <small>(Specify)</small>	<b>02 WASTE QUANTITY AT SITE</b> <small>(Measures of waste quantities must be independent)</small> TONS _____ CUBIC YARDS _____ NO. OF DRUMS <u>Unknown</u>	<b>03 WASTE CHARACTERISTICS (Check all that apply)</b> <input checked="" type="checkbox"/> A. TOXIC <input type="checkbox"/> B. CORROSIVE <input type="checkbox"/> C. RADIOACTIVE <input type="checkbox"/> D. PERSISTENT <input type="checkbox"/> E. SOLUBLE <input type="checkbox"/> F. INFECTIOUS <input type="checkbox"/> G. FLAMMABLE <input type="checkbox"/> H. IGNITABLE <input type="checkbox"/> I. HIGHLY VOLATILE <input type="checkbox"/> J. EXPLOSIVE <input type="checkbox"/> K. REACTIVE <input type="checkbox"/> L. INCOMPATIBLE <input type="checkbox"/> M. NOT APPLICABLE
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**III. WASTE TYPE**

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			According to RCRA Part A, facility generates spent halogenated and non-halogenated solvent waste, which it stores in tanks or drums prior to being manifested off-site for treatment/disposal.
OLW	OILY WASTE			
SOL	SOLVENTS	125,000	lbs/yr	
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

**IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)**

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
F002	spent halog. solvents	----	stored in drums		
F005	spent non-halog. solvents	----	stored in drums		
F003	spent halog. solvents	----	stored in tanks		
	(particular waste types include isobutanol and methylene chloride)		Facility ships 7-10 drums of F002 waste to Seaboard Chemical Co. in Jamestown, NC, every 90 days. In the past, Squibb has manifested waste to Carochem in Durham, NC. Waste has also been shipped to the Squibb facility in Brunswick, NJ.		

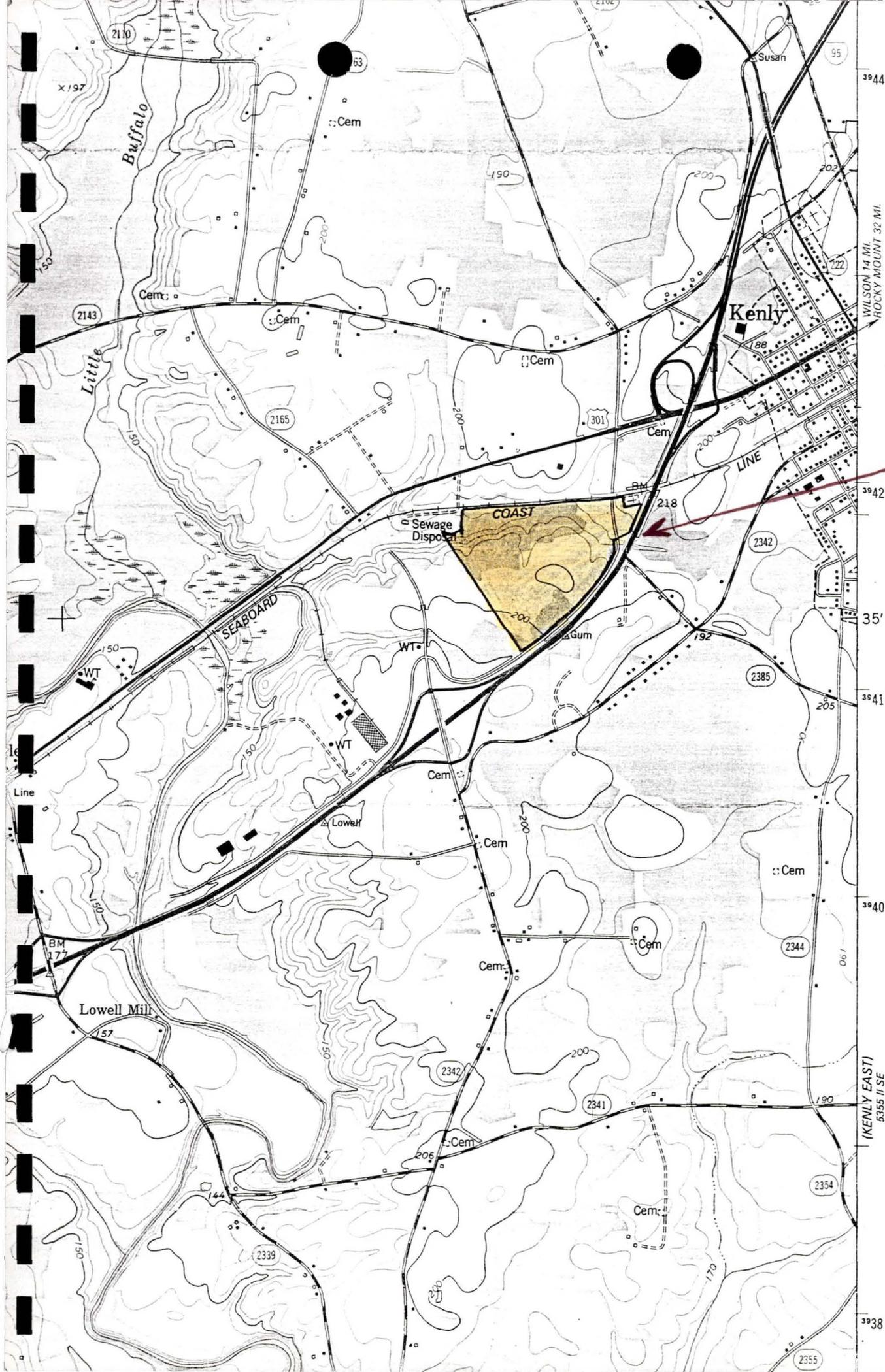
**V. FEEDSTOCKS (See Appendix for CAS Numbers)**

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	N/A		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

**VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)**

- Files at the NC Solid and Hazardous Waste Mgmt. Branch, Raleigh, NC.
- Bill Pharr, plant eng. at Squibb, in Kenly, NC, personal communication, 12-3-85.

FILE



E.R. SQUIBB + SONS  
 35° 35' 09" N  
 78° 08' 27" W

EPA ID No.  
 NCT380010652

NC D991278730

USGS 7.5'  
 KENLY WEST, NC  
 (1978)

TO: File  
FROM: D. Mark Durway  
DATE: 12-11-85  
RE: E.R. Squibb and Sons/NC D991278730

I spoke to Bill Pharr, plant manager at Squibb, on 12-3-85. Mr. Pharr stated that the plant uses water supplied by the city of Smithfield. To the best of his knowledge, he believes that local residents also use city water. The nearest home, he said, is located about 0.5 miles from the facility.

No on-site disposal, spills, or other releases have occurred on-site, according to Mr. Pharr.

Squibb aerates 5000 to 15,000 GPD of wastewater on-site in a concrete tank, prior to discharging it to the city sewer.

Squibb is a new facility which commenced operation in 1978.

DMD/tb/0175b



I.D. - FOR OFFICIAL USE ONLY										
3										7/21/84
W										1
1	2	3	4	5	6	7	8	9	10	11

**IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)**

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 24	2	3	4	5	6
7	8	9	10	11	12

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 1 5 1 23 - 24	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

1. IGNITABLE (D001)     
 2. CORROSIVE (D002)     
 3. REACTIVE (D003)     
 4. TOXIC (D004)

**X. CERTIFICATION**

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

SIGNATURE <i>E. Shepherd Holladay</i>	NAME & OFFICIAL TITLE (type of print) E. Shepherd Holladay Manager - Environmental Management	DATE SIGNED 3-7-84
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ATTACH A

ATTACH A

## RCRA INSPECTION REPORT

1. E. R. Squibb & Son, Inc.  
P.O. Box 1000  
Kenly, N. C. 27542  
EPA ID# NCD991278730
2. Bill Pharr, Plant Engineer
3. Larry D. Perry - Solid & Hazardous Waste Management Branch
4. May 12, 1983
5. No Change
6. No Change
7. Facility has delisted from TSD to generator only status. Facility generates only methylene chloride as a hazardous waste. Material is stored in 55-gallon drums and transported off-site within 90-day period. Facility uses Seaboard Chemical Co. as their waste hauler and receiver. Squibb does not send anything else to Carochem as they were doing in the past.
8. 262.34 - Accumulation log needed and numbers need on barrels.
9. Facility was putting numbers on barrels and putting accumulation log into effect on this date of inspection.



E. R. Squibb & Sons, Inc.

Flowers Road  
P.O. Box 1000  
Kenly, North Carolina 27542  
919-284-5131

March 30, 1982



Mr. William Paige  
Division of Health Services  
Post Office Box 2091  
Raleigh, North Carolina 27602

Dear Mr. Paige:

Because of production requirements at the Kenly, North Carolina plant, we are discontinuing the Pencillin drying operation that produces Butyl alcohol (F003). The 4,000 gallon stainless steel underground tank will not be used for storage of Butyl alcohol.

The alcohol in this tank has been pumped into a tanker and transported to our New Brunswick, New Jersey plant for reuse, which is the normal procedure.

Since this alcohol is miscible with water, we propose to dilute the remaining (approximately 1 to 2 gallons) with 200-300 gallons of water, then sewer the dilution. The tank will then be water rinsed and again sewered.

At present we do not have a use for this tank, however, it will be filled approximately half full with water. This will prevent it from floating above ground if the water table rises during heavy rains.

Our Closure Plan is attached for your review.

Sincerely,

*BH Pharr*  
B. H. Pharr  
Plant Engineer

BHP/ln

Attachment

cc: Mr. O. W. Strickland

## CLOSURE PLAN

EPA Facility I. D. NCT380010652

Date March 30, 1982

Page 1 of 4

### RCRA Closure Plan and Cost Estimate for E. R. Squibb & Sons Facility Kenly, North Carolina

#### GENERAL

EPA requires that the Owner/Operator of any site, granted "interim status" to treat, store or dispose of designated hazardous wastes, develop a plan identifying the steps anticipated as necessary to discontinue hazardous waste management activities at any point during, or at the end of the facility's intended life (40 CFR 265.110 - 265.115). The performance standard for these Closure Plans seeks to,

- a) minimize the need for further maintenance of the site, once closed, and
- b) control or eliminate, to the extent necessary to protect human health and the environment, post closure escape of remaining hazardous wastes and their residues.

The costs of implementing the Closure Plan are to be estimated and, periodically updated.

The following plan, developed for the E. R. Squibb & Sons, Inc. facility at Kenly, North Carolina, identifies the expected activities and the anticipated costs for closure of this site.

#### BACKGROUND

E. R. Squibb & Sons, Inc. owns and operates a pharmaceutical manufacturing facility at Kenly, North Carolina. The principal activity at this site involves the processing of unfinished bulk penicillin into such finished product forms as tablets, capsules, and powders for suspension. Some of these activities generate wastes which qualify as hazardous under EPA rules at 40 CFR 261.

In August 1980, in accordance with Section 3010 of the Resource Conservation and Recovery Act (RCRA) Amendments of 1976, Squibb notified EPA that activities at this site generate EPA-designated hazardous wastes. EPA assigned identification number NCT380010652 to the site.

RCRA Closure Plan and Cost Estimate  
for E. R. Squibb & Sons Facility  
Kenly, North Carolina

In November, 1980, Squibb filed an application with the EPA for the site to continue to STORE hazardous waste in accordance with the Agency's "Interim Status" provisions.

As a hazardous waste management facility at which "storage" is authorized, the site may keep hazardous wastes, in containers (e.g. drums) or in tanks, for periods of time exceeding 90 days. The conditions for closure at a storage facility require that the owner/operator

- a) estimate the maximum amount of hazardous wastes on site at any time, and
- b) describe the steps needed for closure; in this case, to remove stored wastes and their containers to other active and authorized treatment, storage, or disposal ("TSD") facilities, and to adequately clean contaminated equipment (e.g. tanks, piping, pumps)

SUMMARY OF FACILITY CONDITIONS

At the Kenly site, the waste materials identified as hazardous are liquids. They result from two separate process operations: solvents recovered from tablet coating are collected in drums; solvent recovered from drying wet process intermediate is collected in a single buried tank.

Both materials are sent off site for reclamation/reuse.

MAXIMUM ANTICIPATED INVENTORIES

- 1) Spent solvents from tablet coating are collected as a mixture of spent methyl alcohol (waste code F003) and spent methylene chloride (waste code F002) in approximately equal amounts. Information on each of these materials is attached. The solvents are collected in 55-gal drums. These drums, when full, are stored until a maximum of twelve are accumulated at which time a solvent reprocessor removes them.

RCRA Closure Plan and Cost Estimate  
for E. R. Squibb & Sons Facility  
Kenly, North Carolina

- 2) Spent n-butyl alcohol (waste code F003) is recovered from the drying of penicillin cake, sent to Kenly from Squibb's New Brunswick, New Jersey, facility. It is collected in a single, underground, stainless steel tank, having a maximum capacity of 4,000 gallons. Collected solvent is returned to New Brunswick for reuse.

REMOVAL OF INVENTORIES AT CLOSURE

The cessation of either, or both, spent solvent producing activities at the Kenly site would require the removal of final accumulated inventories. The site understands that the facilities currently receiving and reusing both waste streams can, and will, continue to do so.

DECONTAMINATION OF STORAGE FACILITIES

The removal of contained solvents, in drums, will leave no storage facilities requiring cleaning.

The removal of solvent from tanks to tank trucks by pumping would be expected to result in a quantity remaining in the tank which can not be pumped out. This quantity is estimated to be about five gallons. The removal of this heel is to be accomplished by rinsing the tank and the accompanying pumps and piping with about 200-300 gallons of water and then sewerage the rinse; rinsing is to be repeated a second time. No additional treatment of the rinse water is necessary since n-butyl alcohol is readily stabilized by secondary wastewater treatment plant organisms (i.e. the Kenly sewerage facility).

Squibb anticipates that these activities will be accomplished within the 180-day period after generating the last scheduled volume of spent solvent. This facility is an active manufacturing site and, as such, no estimates for when spent solvent generating activities might cease can reasonably be made.

ESTIMATED COSTS FOR CLOSURE

- a) Drummed spent solvents are removed by a reprocessor at no cost, normally; a transportation fee of about \$200 may be applied if too few drums of spent solvent are present at the time of a scheduled pick-up.
- b) The shipment of spent solvent from Kenly to New Brunswick incurs only a transportation fee of approximately \$1,300 per load.
- c) Manpower and supervision costs not exceeding \$1,000 are expected to complete closure, as described.

CERTIFICATION OF CLOSURE

When all designated hazardous wastes have been removed from the site and all contaminated equipment has been cleaned, Squibb will engage the services of an independent registered professional engineer to review the plan, to inspect the decommissioned facilities and, together with a Squibb representative, to certify that closure was completed as planned.

ANNUAL REVIEW/ADJUSTMENT OF CLOSURE PLAN AND COSTS

In accordance with 40 CFR 265.142, the elements and the costs of the existing closure plan are to be reviewed annually and adjusted, as necessary, to keep them current. This review is to commence on, or about, May 1, each year.



E. R. Squibb & Sons, Inc.

Flowers Road  
P.O. Box 1000  
Kenly, North Carolina 27542  
919-284-5131



February 2, 1982

Mr. William Paige  
Division of Health Services  
Post Office Box 2091  
Raleigh, North Carolina 27602

Dear Mr. Paige:

Because of production requirements at the Kenly, North Carolina plant, we are discontinuing the Pencillin drying operation that produces Butyl alcohol (F003). The 4,000 gallon stainless steel underground tank will not be used for storage of Butyl alcohol.

The alcohol in this tank has been pumped into a tanker and transported to our New Brunswick, New Jersey plant for re-use, which is the normal procedure.

Since this alcohol is miscible with water, we propose to dilute the remaining (approximately 1 to 2 gallons) with 1,000 gallons of water, then sewer the dilution. The tank will then be water rinsed and again sewered.

At present we do not have a use for this tank, however, it will be filled approximately half full with water. This will prevent it from floating above ground if the water table rises during heavy rains.

Sincerely,

B. H. Pharr  
Plant Engineer

BHP/ln

INTERIM STATUS INSPECTION

1. Facility Information

E. R. Squibb & Sons, Inc.  
P. O. Box 1000  
Kenly, NC 27542 (Johnston County)  
EPA I.D. #NCD991278730 (old I.D. #NCT380010652)

2. Facility Contact

Billy H. Pharr - Plant Engineer

3. Survey Participant

Larry D. Perry, N.C. Solid & Hazardous Waste Management Branch

4. Date of Inspection

January 28, 1982

5. Applicable Regulations

40 CFR Parts 262 and 265, Fr May 19, 1980 and amendments

6. Purpose of Survey

RCRA compliance inspection was conducted at the above facility by the N. C. Solid and Hazardous Waste Management Branch. The scope of the inspection was comprehensive including a record review and site survey. Regulatory requirements covered those contained in 40 CFR 262 and 265 under generator standards, general facility standards, storage facilities, tanks and containers.

7. Facility Description

The Squibb facility is situated on a 97-acre site located on Flowers Road immediately off I-95 South of Kenly, N.C. The facility receives penicillin in bulk and processes it to such finished product forms as tablets, capsules and powders.

Prior to RCRA, Squibb had only one existing environmental permit, this being an air quality permit issued by the N. C. Division of Environmental Management.

The Part A application filed by Squibb listed the company as a generator of halogenated solvent - butyl alcohol (F003). Some isobutanol (F005) is generated also.

The butyl alcohol was stored in a 4,000 gallon underground tank on the site until last week (week of January 18, 1982). Prior to that time all butyl alcohol was stored in the tank and periodically shipped to another Squibb facility in New Brunswick, N.J. for reprocessing. As of the January 18, 1982 week, there will be no more butyl alcohol generated at the Kenly site. The tank has been emptied and will be cleaned out and left in the ground. A closure plan for this tank close-out is to be sent to William Paige for approval prior to clean-out. This letter will be submitted immediately or prior to February 12, 1982.

The methylene chloride is stored in 55-gallon steel drums within the Squibb manufacturing building. This material will continue to be generated. The isobutanol that is generated is mixed with the methylene chloride for storage. Periodically the methylene chloride - isobutanol is picked up by Carochem of Durham (NCT380011031) and transported to that facility for reprocessing.

No hazardous waste is released from the plant. All liquid waste leaving the site is treated by aeration on the site prior to release to the Kenly Wastewater Treatment Plant which has an NPDES permit. Squibb disposes of a volume of defective penicillin products (all solid material - no liquids) in the Johnston County Landfill of which they have a letter of consent from our office.

The site was in overall good shape except for a few deficiencies. The manifest system was in good order. Such things as contingency plan was only in need of updating, closure plan was excellent just needed to be made site specific, etc.

8. Documentation of Site Deficiencies/Recommendations

Squibb was deficient in the areas cited below:

1. (265.14(c)) - Danger signs needed at entrance to storage areas.
2. (265.16) - Personnel training needed documentation.
3. (265.5) - Contingency Plan needed - site has a plan but needs organization.
4. (265.110-112) - Closure Plan needs to be made site specific to Kenly.
5. Tank close-out plan needs to be submitted immediately.

9. Compliance Schedule

A compliance date of April 1, 1982 was agreed to by inspector and Squibb management for deficiency corrections. Another inspection will be made on this date or soon after for correction compliance.

A tank closure plan will be submitted prior to February 12, 1982 to William Paige for approval.