

645SERBSF10,637

645SERBSF10,637

Site Name (Subject): UNIROYAL INC/UNIROYAL CHEMICAL

Site ID (Document ID): NCD003164464

Document Name (DocType): Correspondence (C)

Report Segment:
Description: General Correspondence, 1981 - 2011

Date of Document: 9/21/2011

Date Received:

Box: *Enter SF and # with no spaces* SF10,637

Access Level: PUBLIC

Division: WASTE MANAGEMENT

Section: SUPERFUND

Program (Document Group): SERB (SERB)

Document Category: FACILITY

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Bartlett, Melanie

From: Bateson, James
Sent: Wednesday, September 21, 2011 5:30 PM
To: Bartlett, Melanie
Subject: File to get at Tillery plus Country Club Lane info

File to get:

Uniroyal Inc. Uniroyal Chemical Div (NCD003164464)

Also, I left a yellow file folder on my desk from Vince. It might save you some time on Country Club Lane compilation.

Vince has his GW summary table in Excel if you want to adorn it with anything else you find in the file.

Thanks,

Jim Bateson
Head, Site Evaluation and Removal Branch
Superfund Section
Division of Waste Management
North Carolina Department of Environment and Natural Resources
1637 Mail Service Center
Raleigh, NC 27699-1637
(919) 508-8487 phone
(919) 733-4811 fax

****AS OF OCTOBER 24, 2011 MY NEW PHONE AND FAX NUMBER WILL BE 919-707-8329****

*E-mail correspondence to and from this address may be subject to the
North Carolina Public Records Law and may be disclosed to third parties.*

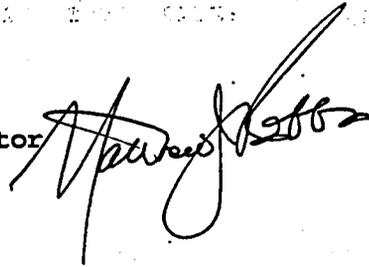
1995

DATE: August 22, 1995

DATE:

SUBJECT: REMOVAL FROM EPA'S CERCLIS INVENTORY

FROM: Matthew J. Robbins, Brownfields Coordinator
Waste Management Division, Region IV



TO: UNIROYAL INC UNIROYAL CHEMICAL DIV
214 W RUBY AVE
GASTONIA
NC 28052

EPA has identified the Brownfields Initiative as one of the Agency's top priorities. The term "brownfields" refers to previously used properties that may lie vacant because potential contamination makes them unmarketable to the private sector. EPA has recently announced a comprehensive Brownfields strategy, including Pilot grants to municipalities, to stimulate economic revitalization.

One part of the strategy has been for EPA to review its complete inventory of Superfund sites. These sites have been screened and determined to require no remedial action under the Federal Superfund Program based on information available as well as on conditions and policies that currently exist. This is to notify you that EPA has removed your facility from EPA's computer inventory known as CERCLIS. THIS DOES NOT INDICATE THAT THE STATE HAS MADE A SIMILAR DETERMINATION.

If you have any questions, please call me at 404/347-5059 ext. 6214.

cc: State Agency

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IV

TO: NC

Site Name: Uniroyal, Inc.

EPA ID#: NCD 003 164 464

RECEIVED
OCT 03 1994
SUPERFUND SECTION
State: NC

Alias Site Names: _____

City: Gastonia

County or Parish: Gaston

State: NC

Refer to Report Dated: August 22, 1994

Report type: SIP

Report developed by: David Kirby, Dynamac for BVWS

DECISION:

1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:

1a. Site does not qualify for further remedial site assessment under CERCLA
(No Further Remedial Action Planned - NFRAP)

1b. Site may qualify for further action, but is deferred to: RCRA NRC

2. Further Assessment Needed Under CERCLA: 2a. (optional) Priority: Higher Lower

2b. Activity Type: PA SI ESI HRS evaluation

Other: _____

DISCUSSION/RATIONALE: In 1990, FIT conducted an SI at the facility. The onsite soil analysis revealed elevated organic and inorganic contamination, however due to the low potential target value, a disposition of no further remedial action was assigned.

Report Reviewed and Approved by: Cynthia K. Gurley Signature: Cynthia K. Gurley Date: 09/19/94

Site Decision Made by: Cynthia K. Gurley Signature: Cynthia K. Gurley Date: 09/19/94



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

September 29, 1994

RECEIVED
OCT 03 1994
SUPERFUND SECTION

4WD-WPB

Ms. Pat DeRosa, Head
CERCLA Branch
North Carolina Department of Environment,
Health and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Dear Ms. DeRosa:

The following reports have recently been reviewed and accepted by EPA - Region IV Site Assessment Section:

Site Inspections

Forbes Road Well Site
Spann Property

NFRAP
NFRAP

Site Inspection Prioritizations (SIPs)

Anilox Roll	NFRAP
Asheboro Municipal Landfill	NFRAP
Ashland Petroleum Company	NFRAP
BP Oil	NFRAP
Carochem	NFRAP
Cone Mills Corporation Plant	NFRAP
Croft Metals	NFRAP
Dayco Corporation	NFRAP
Eaton Corporation	NFRAP
Fasco Industries, Inc.	NFRAP
Gaston Co., Dyeing Machine Company	NFRAP
Gaston Co., Dyeing Machine Company (Stanley)	NFRAP
Greensboro City Landfill	NFRAP
Harrisburg Park Landfill	NFRAP
Henson Landfill	NFRAP
Highway 801 Barber	NFRAP
Holding Pond for Scrubber Waste	NFRAP
Honeywell Micro Switch Division	NFRAP
Kelly-Springfield Tire Company	Further Action
Lee County Landfill	NFRAP
Marantz Piano Company	NFRAP
Old Western NC Fairgrounds	NFRAP

Olin Corp. Ecusta Paper & Film Group
 Pantasote, Inc.
 REA Magnet Wire Company
 Rowe Corporation Property
 S&S Metals Recycling Site
 Scovill Inc.
 Stewart-Warner Site
 Superior Products Company
 Texaco, Inc.
 Torpedo Wire and Strip
 Union County Landfill
 Uniroyal, Inc.

NFRAP
 NFRAP
 Further Action
 NFRAP
 NFRAP
 NFRAP
 NFRAP
 NFRAP
 NFRAP
 Further Action
 NFRAP

EXPANDED SITE INSPECTION

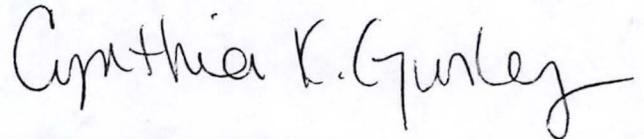
Davis Park Road TCE Site

Further Action

Enclosed please find the Remedial Site Assessment Decision Forms for each report generated by the North Carolina Superfund program and a copy of the actual report generated by the EPA Contractor.

If you have any questions concerning these site decisions, please call me at (404) 347-5059, Extension 6150.

Sincerely,



Cynthia K. Gurley
 North Carolina, PO

Enclosures

**UNIROYAL
CHEMICAL**

RECEIVED
SEP 18 1991
SUPERFUND SECTION

Uniroyal Chemical Company, Inc.
214 West Ruby Avenue
P. O. Box 2337
Gastonia, North Carolina 28053-2337
(704) 864-3411

September 16, 1991

Debra Vaughn-Wright
EPA Region 4
345 Courtland St. N.E.
Atlanta, Ga. 30365

re: Final Site Inspection Report, dated June 18, 1991
Uniroyal Chemical Company, EPA ID #NCD003164464

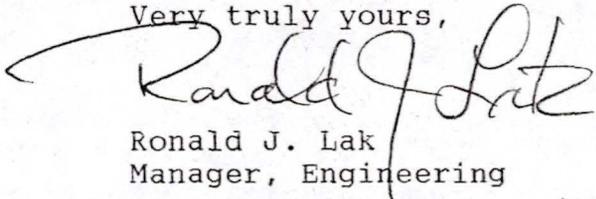
Dear Ms. Vaughn-Wright,

Thank you for giving us an opportunity to review and present our comments on the referenced document. Based on our detailed review, we feel that there are significant discrepancies in the content of the report. We also believe that the conclusions and final recommendations of this report are inaccurate.

Enclosed are our comments on the report. We want to bring these to your attention and trust that you will consider them in evaluating our plant site.

Please contact me if you should have any questions or would like to further discuss this report.

Very truly yours,


Ronald J. Lak
Manager, Engineering

cc: Pat Derosa
Superfund Section
North Carolina Department of Environment, Health
and Natural Resources
P.O. Box 27687
Raleigh, North Carolina 27611-7687

The June 1991 report prepared by NUS Corporation contains several errors which Uniroyal Chemical (Uniroyal) believes invalidate the conclusions and recommendations of the report. These are explained below:

1. The surface soil sample referenced as UC-SS-06 is identified in the report as the most upgradient soil sample taken from a drainage ditch the western boundary of the property. The report goes on to infer how contamination at this ditch is indicative of on-site contamination. This is wrong. This sample should have been designated as background.

The soil sample was actually taken at the request of Uniroyal Chemical, from the ditch, upgradient of any stormwater discharge from Uniroyal. Uniroyal wanted to establish that a background different from UC-SS-01 exists, due to the possibility of contamination from other sources over which Uniroyal has no control.

2. It is our belief that none of the metal contamination in the background soil sample UC-SS-06 is related to the Uniroyal Chemical facility, and that most, if not all, of the contaminants found in the other soil and sediment samples ... are related to that background source rather than to our site.

3. Page ES-1 Paragraph 1

This facility is primarily involved in the manufacture of polyurethane prepolymers. Herbicides and pesticides are less than 50% of production at our plant, and primarily just formulation and packaging, not manufacturing.

4. Page ES-1 Paragraph 1

Contrary to what the report states, Uniroyal never stored any raw or waste chemicals in a "waste pile." As it was explained to NUS during the site inspection, the so-called waste pile consisted solely of baled and bundled empty raw material bags in which thiuram, maleic hydrazide, and phthalic anhydride were received. These bags were not then, and still are not defined as "hazardous wastes," under either the North Carolina State or Federal Laws.

5. Page ES-1 Paragraph 3

There is no known use of the Catawba Creek for recreational fishing except at the mouth or cove where it enters Lake Wylie 9 miles downstream.

6. Page ES-2 Paragraph 2

Heavy metals and salt-forming metals are not used in our urethane prepolymer or fungicide production: Propargite is a raw material used in formulations of miticides, however Endosulfan 1 (alpha) has never been produced or formulated at this facility.

7. Page 3 Paragraph 1

The plant's operation in 1955 consisted of latex compounding for the carpet and fabric industry. As stated in the report, agricultural chemical formulation activities did not begin during this period.

8. Page 3 Paragraph 2, and Page 7 Top Paragraph

The "waste pile," as mentioned earlier, consisted of non-hazardous baled and bundled empty raw material bags.

9. Page 19 Paragraph 4

The asphalt detention basin from which sample UC-SS-05 was taken receives the minimum amount of stormwater run-off versus all other basins in the plant.

10. Page 26 Paragraph 1

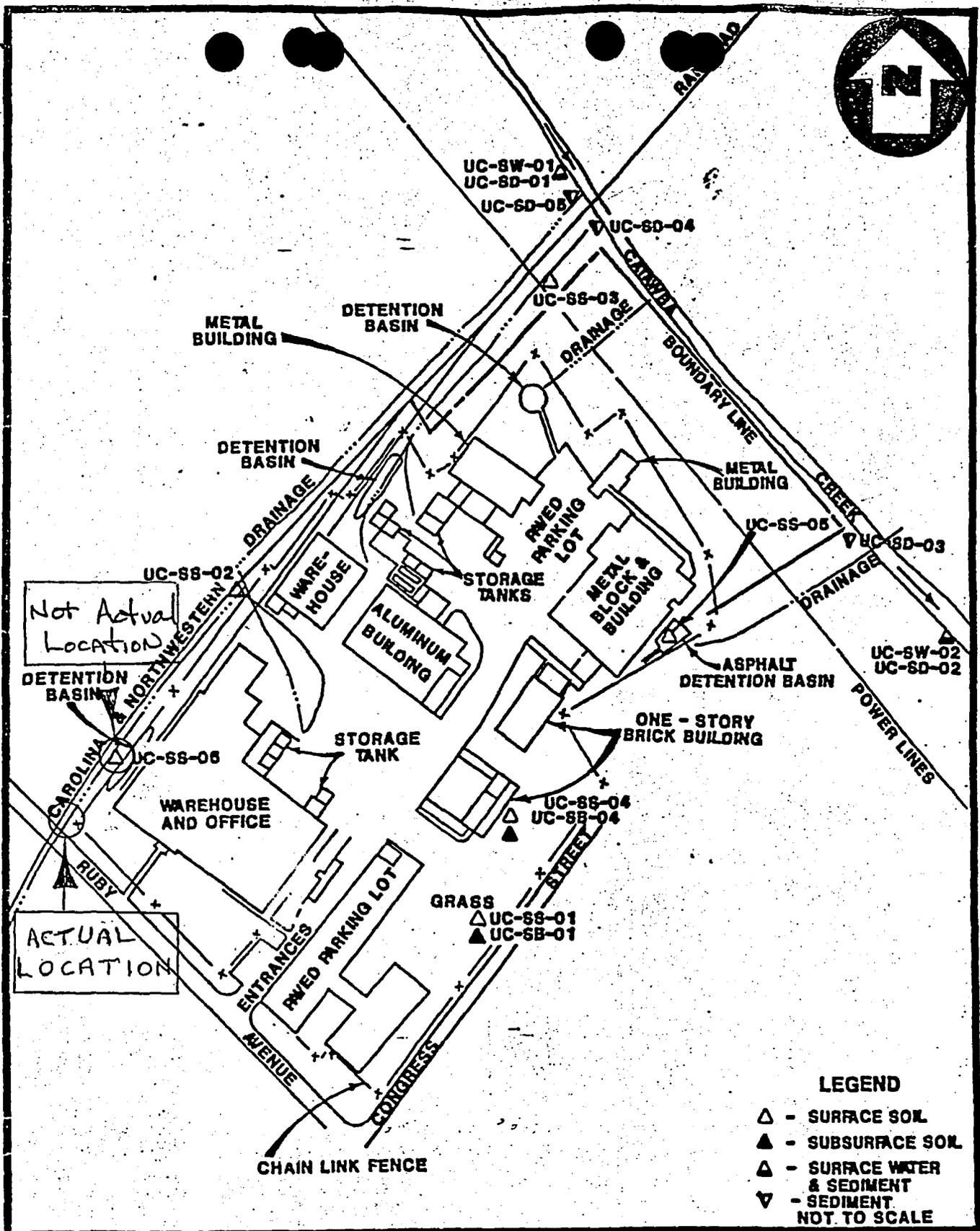
The report states that arsenic was identified in four of the surface soil samples based on "presumptive evidence of presence." We believe it is highly inappropriate to use such data in this report.

11. Page 26 Paragraph 2

Uniroyal Chemical does not use metal catalysts or salts of metals as catalysts in our urethane prepolymer production. Uniroyal also does not manufacture or formulate metallic or organometallic fungicides at this facility.

12. Page 27 Summary of Analytical Results, Sediment Samples

See comments Nos. 1 and 2.



**SAMPLE LOCATION MAP
 UNIROYAL CHEMICAL COMPANY
 GASTONIA, GASTON COUNTY, NORTH CAROLINA**

FIGURE 3





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUN 28 1991

4WD-WPB

Ms. Pat DeRosa, Head
North Carolina Department of Environment
Health and Natural Resources
Division of Solid Waste Management
P.O.Box 27687
Raleigh, North Carolina 27611

RE: Uniroyal Chemical Company
NCD003164464

Dear Ms. DeRosa:

Enclosed for you files is the Site Inspection (SI) report prepared by the Region IV Field Investigation Team, NUS Corporation for Uniroyal, Inc., Uniroyal Chemical Company, Gastonia, North Carolina (NCD003164464). Based on the information presented in the SI, further evaluation using the Hazard Ranking System is being recommended.

If you have any questions, please contact me at (404) 347-5065.

Sincerely yours,

Deborah A. Vaughn-Wright
Project Manager

enclosures

RECEIVED
JUL 08 1991
SUPERFUND SECTION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED

AUG 22 1990

SUPERFUND SECTION

4WD-WPB

AUG 20 1990

Ms. Pat DeRosa, Head
North Carolina Department of Environment
Health and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611

Dear Ms. DeRosa:

Enclosed for your files are six Screening Site Inspection (SSI), Phase I reports and a SSI Phase II Study Plan prepared by the Region IV Field Investigation Team, NUS Corporation. The site names and their determinations are as follows:

Valspar Corporation	NCD041415019	NFRAP
Lilly Company Drum Reconditioning Plant	NCD000616334	NFRAP
Union Camp Corporation	NCD003216959	SSI Phase II
Uniroyal Chemical Co.	NCD003164464	Study Plan Appr.
Reliance Universal Inc.	NCD006390561	NFRAP
Royal Development Co., Inc.	NCD003521960	NFRAP
West Point Pepperell	NCD045924032	SSI Phase II

In addition, the SSI for DeSoto, Inc. (NCD00314319) prepared by John McConney of the North Carolina Superfund Section has been reviewed. The Region concurs with his recommendation for no further action at this site.

If you have any questions, please contact me (404) 347-5065.

Sincerely yours,

Deborah A. Vaughn-Wright
Project Manager

Enclosures



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

August 15, 1990

William L. Meyer
Director

Mr. Boyce Hunt
Sanitarian Supervisor
Gaston County Health Department
991 West Hudson Blvd.
Gastonia, NC 28052

RE: Phase II Screening Site Investigation
Uniroyal Chemical Company
NCD 003 164 464

Dear Mr. Hunt:

David Lilley of the NC Superfund Section spoke with you today to notify you that the EPA Field Investigation Team (FIT) will conduct a screening site investigation of the subject site located in Gaston County, North Carolina. The investigation will be conducted on August 20-24, 1990 by Eric Corbin of NUS Corporation.

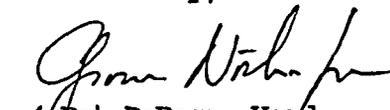
The purpose of the investigation is to determine if the site poses a hazard to public health or the environment because of releases of contaminants to soil, surface water, groundwater, or air. The investigation team will take samples on and around the site to determine if a hazardous condition exists. Additionally, they will locate all nearby water supplies (surface and groundwater, community and private) and any close sensitive environments, schools, and day care centers.

This investigation is not an emergency situation but is a normal step in the evaluation of all uncontrolled and unregulated potential hazardous waste sites in North Carolina. You may want to have your representative meet the investigation team at the site. If so, please contact Eric Corbin at 1-800-888-7710 and he will coordinate a meeting. I am enclosing background data on the site for your information.

Mr. Hunt
8-15-90
Page 2

If the investigation indicates the need for future study of the site, we will contact your office to advise. If you have any questions, please don't hesitate to call David Lilley or me at (919) 733-2801.

Sincerely,


Pat DeRosa, Head
CERCLA Branch
Superfund Section

Enclosures

cc: Gordon Layton
Doug Holyfield
Steve Reid
Lois Walker
Ann Rudd
David Lilley
File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

AUG 03 1990

RECEIVED

AUG 13 1990

4WD-WPB

SUPERFUND SECTION

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ron Lak
Uniroyal Chemical Company, Incorporated
214 W. Ruby Avenue
Gastonia, North Carolina 28054

RE: Uniroyal Chemical Company, Incorporated
214 W. Ruby Avenue
Gastonia, North Carolina 28054
NCD003164464

Dear Mr. Lak:

The United States Environmental Protection Agency (EPA), pursuant to the authority and requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42, U.S.C. 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act (SARA), Public Law 99-499, is planning to conduct an investigation of the above-referenced site. Uniroyal Chemical Company, Incorporated located on Ruby Avenue in Gastonia, North Carolina. EPA has reason to believe that there may be a release or threat of a release of hazardous substances from the site into the surrounding environment. The purpose of the investigation is to determine the nature and extent of contamination at the site and to determine what, if any, further response action would be appropriate.

As per John Robinson's telephone conversation with me on July 30, 1990, EPA was granted permission for access to your property beginning on August 20, 1990, and continuing through the completion of the investigation on or about August 24, 1990. Activities to be conducted during the investigation may include:

1. Inspect, sketch, and photograph the premises;
2. Collect surface and subsurface soil samples;
3. Collect groundwater and subsurface water samples;
4. Collect sediment samples;
5. Conduct air monitoring;
6. Transportation of equipment onto and about the site as necessary to accomplish the activities above, including trucks and sampling equipment.

The above sampling activity will be conducted by personnel from EPA Region IV's Field Investigation Team (FIT). Eric Corbin of FIT will contact you prior to the actual site visit to make final arrangements and note any changes.

Split samples will be made available if requested. However, you will be required to furnish your own containers as well as your own laboratory analyses.

If you have any questions, please contact me at (404) 347-5065. Your cooperation in this matter is appreciated.

Sincerely,

Kelly Cain
Environmental Engineer

cc: Pat DeRosa, NCDEHR
Eric Corbin, NUS Corporation

KC:sw:Doc Access 7:Disk Cain:7/30/90:x5065

4WD-SAS

4WD-SAS

CAIN

DEIHL

Trip Notification & Authorization

Prepared by: David Lilley

Today's Date: August 13, 1990

*Use Black Ink or Typewriter only-Staff to fill out first 2 blocks only.

Site Trip

Date of Trip: August 20, - 24, 1990

If trip date changed or cancelled note below:

Trip Date Changed To: _____ Cancelled: _____

NCD#: 003 164 464

Site Name: Uniroyal Chemical Co.

City: Gastonia

County: Gaston

Reason for Trip: Phase II Screening Site Investigation

Name of Hotel (Overnight Trip): _____ Hotel Telephone Number: () _____

Authorized by: David B. Lilley
Industrial Hygienist

Project Team Leader: Eric Cochran

Assistants: _____, _____, _____

Attach To Notification Form: 1 copy each: Preliminary Assessment Form (First page only)
Submit to the Industrial Hygienist Site Map
PA Transmittal Letter

(Please list appropriate County Health Department contact person to call to advise of trip)
Environmental Supervisor or Health Director to call: Boyce Hunt Title: Sanitarian Supervisor
(Note if Dr., M.P., etc.)
Telephone Number: (704) 853-5200

Notes: Health Department Official Contacted: Boyce Hunt
Back Up Letter Required: Yes No
Notified Mr. Hunt on 8-15-90 (DBC)

Note: Signed original to Data Manager



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

James G. Martin, Governor
David T. Flaherty, Secretary

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

3 March 1989

Mr. Boyce Hunt
Environmental Health Supervisor
Gaston County Health Department
611 North Highland Street
Gastonia, NC 28052 Courier 651

RE: Off-Site Reconnaissance
Uniroyal Inc.-Uniroyal Chemical Division
NCD 003 164 464

Dear Mr. Hunt:

Grover Nicholson of the NC Superfund Branch spoke with you today to notify you that the US EPA Field Investigation Team (FIT) will conduct an off-site reconnaissance of Uniroyal Inc.-Uniroyal Chemical Division located at 214 West Ruby Avenue, Gastonia, NC. The investigation will be conducted during the week of 20 March 1989 by Ken Mallory of NUS (404) 938-7710.

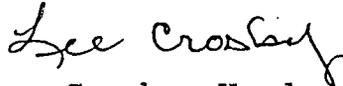
The purpose of the reconnaissance is to decide if the site poses a hazard to public health or the environment because of possible releases of contaminants to soil, surface water, groundwater, or air. The investigation team will locate all nearby water supplies (surface and groundwater, community and private) and any close sensitive environments, schools, and day care centers. They will also note the site layout and surrounding land use.

This reconnaissance is not an emergency situation but is a normal step in the evaluation of all uncontrolled and unregulated potential hazardous waste sites in North Carolina. You may want to have your representative meet the FIT at the site. If so, please contact Ken Mallory, at (404)938-7710 and he will coordinate a meeting. I am enclosing background data on the site for your information.

Mr. Hunt
3-3-89
Page 2

If the reconnaissance indicates the need for future study of the site, we will contact your office to advise. If you have any questions, please don't hesitate to call Grover Nicholson or me at (919)733-2801.

Sincerely,



Lee Crosby, Head
Superfund Branch
Solid Waste Management Section

Enclosures

cc: Gordon Layton
Gary Babb
Steve Reid
Lois Walker
Ann Rudd
Grover Nicholson

LC/db/5.doc

FEDERAL
TRIP
NOTIFICATION
& AUTHORIZATION

TODAY'S DATE: 3 March 89
PREPARED BY: G. Nish-for (Staff member filling out form)

SITE TRIP
DATE OF TRIP: Week of 20 March 89
If trip date changed or cancelled note below:
CHANGE OF DATE TO: _____ OR CANCELLED: _____
Notified by telephone
on 3 Mar '89 by
Joan Dupont
NUS-SPA FIT

SITE NAME: Uniroyal Inc - Uniroyal Chemical Division
NCD#: 003 169 464
REASON FOR TRIP: off-site reconnaissance

CITY: Gastonia COUNTY: Gaston

If Overnight trip, Hotel staying at: _____
Telephone Number: _____

(Please list appropriate county health person to call to advise of trip)
ENVIRONMENTAL SUPERVISOR OR
HEALTH DIRECTOR TO CALL: Mr. Boyce Hunt TITLE: Environmental Health
(Note if Dr., M.P., etc.) Supervisor

Telephone Number: (704) 866-3234

Project Team Leader: NUS EPA FIT
Assistants: Ken Mallory
404 933-7710

AUTHORIZED BY: G. Nish-for
~~Supervisor~~ Unit Supervisor
CERCLA

ATTACHMENT
TO NOTIFICATION FORM: 4 copies each of PRELIMINARY ASSESSMENT FORM (1st page only)
NOTIFICATION FORM, & EPA TRANSMITTAL LETTER

- Staff Notification Procedure: (Use black ink or Typewriter Only)
1. Above form goes to Data Management Coordinator (DMC) 10 days prior to trip
 2. If date of trip changes - note changed date, or mark "X" if cancelled
 3. DAY AFTER TRIP, submit to Lee Crosby a short paragraph on site trip.

NOTES:
HEALTH DEPT. OFFICIAL CONTACTED: G. Nish-for contacted
BACK UP LETTER REQUIRED: Yes No Boyce Hunt on 3 March 89



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 2, 1985

Ms. Denise Bland
EPA NC 3012 Project Officer
Air & Hazardous Material Division
345 Courtland St., NE
Atlanta, Ga. 30365

Dear Ms. Bland:

Enclosed are Preliminary Assessments for the following ERRIS sites in North Carolina:

1. Diamond Shamrock Corporation
Castle Hayne
NC D057454670
2. Dow Chemical Corporation
Charlotte
NC D074518671
3. General Tire & Rubber Company
Charlotte
NC D043679349
4. Kelly-Springfield Tire Company
Fayetteville
NC D048958615
5. Koppers Company, Inc.
Morrisville
NC D003200383
6. Toastmaster, Inc.
Laurinburg
NC D037160439
7. Uniroyal Inc./Uniroyal Chemical Division
Gastonia
NC D003164464
8. Whittaker Chemical Company
Lenoir
NC D039058524

Diamond Shamrock Corporation was entered into ERRIS due to a RCRA 3001 notification for storage of spent pickle liquor, lead, and chromium, treatment

Ms. Denise Bland
January 2, 1985
Page 2

of spent pickle liquor and chromium and disposal of chromium. An on-site lagoon has received process waste-water and waste-water treatment plant sludge for some time. A spillage of an estimated 1072 tons of chromic acid and sodium bichromate occurred in 1974. The North Carolina Department of Natural Resources and Community Development monitors remedial actions to recover this chromium contamination with approximately 857 tons being recovered through a series of at least 24 recovery wells. A low priority for site inspection is recommended in order to evaluate the possibility of contamination in the lagoon and at the location of the chromic acid/sodium bichromate spill.

Dow Chemical Corporation was entered into ERRIS due to its inclusion on the Eckhardt Waste Disposal Site Survey. This site, according to Dow, was nothing more than a sales facility. No storage or disposal activities occurred at this site. Dow moved from this site on August 3, 1984 to 5727 Westpark Drive in Charlotte. No further action is recommended for this site based on current information.

General Tire & Rubber Company was entered into ERRIS due to a RCRA 3001 notification for storage of halogenated solvents (1-1-1 trichloroethane), heavy metals (chromium and lead), thiram, toluene, and asbestos. All was drummed except for chromium and lead which was stored in waste piles for a period of time. A low priority for site inspection is recommended in order to evaluate the presence of contaminants in the drum storage, waste pile, and evaporation drum areas.

Kelly-Springfield Tire Company was entered into ERRIS due to a RCRA 3001 notification for storage of methylene chloride, thiram, and N-nitrosodiphenylamine. Kelly also informed this office of the transportation of PCB materials from several transformer cleanups and of the transportation of 1-1-1 trichloroethane. According to Kelly officials, all spills were of small quantity and were adequately cleaned up, containerized, and shipped to a hazardous waste disposal facility. Several employees, however, have indicated that either Kelly-Springfield or its industrial maintenance contractor, Defender, have disposed of cleaning fluids on-site. Due to the relatively small quantities of known hazardous materials utilized at this site and the low potential for contamination of public water supplies, a low priority for site inspection is recommended to access the possibility of any on-site contamination.

Koppers Company was entered into ERRIS due to a CERCLA 103 (c) notification for land treatment of organic wastes (in 1978) and for an on-site surface impoundment. Wood treatment using pentachlorophenol (PCP) occurred at this site from 1968 to 1975. Waste materials such as bark, saw dust, and excess PCP were dumped into pits for disposal. According to an EPA site investigation report (dated January 27, 1981) waste piles and disposal pits were still present on-site on September 24, 1980. Koppers removed approximately 220 tons of contaminated soil in April, May, and November of 1980, shipping it to SCA. A hydrogeologic investigation by Koppers (11/13/84) indicated pentachlorophenol contamination in seven on-site wells. Due to the existence of private groundwater supply wells in the immediate vicinity a medium priority for site inspection is recommended for this site.

Ms. Denise Bland
January 2, 1985
Page 3

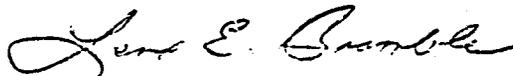
Toastmaster was entered into ERRIS due to a RCRA 3001 notification for treatment and storage of chromium and wastewater treatment sludges from electroplating operations. Possible or suspected contaminants are chromium, hexavalent chromium, cadmium, nickel, cyanide, 1-1-1 trichloroethane, and trichloroethylene. Areas of most concern are the closed out primary and secondary lagoons, closed out sand filter bed, and the existing sludge burial trenches. Monitoring wells at this site show low levels of nickel and cyanide (0.3 MG/L and 0.08 MG/L respectively). A medium priority for site inspection was assigned to this site based on the potential problems at this facility and the existence of private water supply wells in the immediate vicinity. A site inspection was conducted at this facility December 18, 1984. The site inspection report will be forwarded to EPA/Region IV upon completion.

Uniroyal Inc./Uniroyal Chemical Division was entered into ERRIS due to a RCRA 3001 notification for storage of various hazardous materials in drums or waste piles. Thiram, maleic hydrazide, and phthalic anhydride were stored in waste piles. Substances containerized are acetone, chloroform, formaldehyde, methanol, 1-naphthylamine, toluene diisocyanate, xylene, pyridine, methyl ethyl ketone, and Z-sec-butyl-4,6-dinitrophenol. A low priority for site inspection has been assigned to this site to access the likelihood of soil contamination in the drum storage and waste pile areas.

Whittaker Chemical Company was entered into ERRIS due to a RCRA 3001 notification for storage of spent non-halogenated solvents, and storage of solvent and water cleaning wastes from paint manufacturing. This notification is a duplication of Reliance Universal of Kentucky (NC D053009510). A low priority for site inspection is recommended for this site to access the effectiveness of remedial actions at this site.

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

Sincerely,



Lenox E. Bramble, Environmental Engineer
Solid and Hazardous Waste Management Branch
Environmental Health Section

LEB/lw/1706
Enclosures



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

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
NC	D003164464

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER			
Uniroyal Inc./Uniroyal Chemical Div.		214 W. Ruby Ave; P.O. Box 2337			
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Gastonia	NC	28052	Gaston	36	10
09 COORDINATES LATITUDE		LONGITUDE			
35 14 38. _		_ 81 11 15. _			

10 DIRECTIONS TO SITE (Starting from nearest public road)
In Gastonia at intersection of US 321 and US 29/US 74, take US 321 South approximately 1.1 miles. Turn left on Ruby Street. Uniroyal will be on left side approximately 1/4 mile down Ruby Street.

III. RESPONSIBLE PARTIES

01 OWNER (if known)		02 STREET (Business, mailing, residential)			
Uniroyal, Inc. World Headquarters					
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER		
Middlebury	CT	06749	203) 573-3837		
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
			()		

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 3001 DATE RECEIVED: 7/1/80 B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION		BY (Check all that apply)			
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	DATE <u>9</u> / <u>1</u> / <u>81</u>	<input type="checkbox"/> A. EPA	<input type="checkbox"/> B. EPA CONTRACTOR	<input checked="" type="checkbox"/> C. STATE	<input type="checkbox"/> D. OTHER CONTRACTOR
		<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)			
		CONTRACTOR NAME(S): <u>RCRA compliance inspection</u>			
02 SITE STATUS (Check one)		03 YEARS OF OPERATION			
<input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	<u>1955</u>		<input type="checkbox"/> UNKNOWN		
		BEGINNING YEAR ENDING YEAR			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
This company has used various solvents and organic compounds including growth regulants, fungicides, and solvents such as acetone and xylene.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
Possible groundwater and/or soil contamination. Area around location of discontinued waste piles and handling of hazardous substances prior to 1980 require further attention. Catawba Creek at rear of property should intercept surface and subsurface contamination.

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		02 OF (Agency/Organization)		03 TELEPHONE NUMBER	
John W. Robinson, Jr.		Uniroyal Chemical		(704) 864-3411	
04 PERSON RESPONSIBLE FOR ASSESSMENT		05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
O.W. Strickland		NC DHS	Solid & Haz Waste Mgt. Br	(919) 733-2178	<u>11</u> / <u>27</u> / <u>84</u> MONTH DAY YEAR



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION
01 STATE NC 02 SITE NUMBER D003164464

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply) <input type="checkbox"/> A. SOLID <input checked="" type="checkbox"/> B. POWDER, FINES <input type="checkbox"/> C. SLUDGE <input type="checkbox"/> D. OTHER _____ <small>(Specify)</small>	02 WASTE QUANTITY AT SITE <small>(Measures of waste quantities must be independent)</small> TONS _____ CUBIC YARDS <u>Unknown</u> NO. OF DRUMS _____	03 WASTE CHARACTERISTICS (Check all that apply) <input checked="" type="checkbox"/> A. TOXIC <input checked="" type="checkbox"/> B. CORROSIVE <input type="checkbox"/> C. RADIOACTIVE <input type="checkbox"/> D. PERSISTENT <input checked="" type="checkbox"/> E. SOLUBLE <input type="checkbox"/> F. INFECTIOUS <input checked="" type="checkbox"/> G. FLAMMABLE <input checked="" 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
---	--	--

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS	Unknown		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	Unknown		
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
SOL	Thiuram	137268	Waste Pile		
SOL	Maleic Hydrazide	123331	Waste Pile		
SOL	Phthalic Anhydride	85449	Waste Pile		
SOL	Acetone	67641	Drum		
SOL	Chloroform	67663	Drum		
OCC	Formaldehyde	50000	"		
SOL	Methanol	67561	"		
SOL	1-Naphthylamine	134327	"		
SOL	Toluene Diisocyanate	584849	"		
SOL	Xylene	1330207	"		
SOL	Pyridine	110861	"		
SOL	Methyl Ethyl Ketone	78933	"		
SOL	2-Sec-Butyl-4,6-Dinitrophenol	88857	"		

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

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

1. Letters dated 1-3-83, 7-9-84, 10-25-84
2. RCRA Inspection dated 9-1-81
3. RCRA Part A (Date not legible)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
NC D003164464

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 A. GROUNDWATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

From storage of Thiram, Maleic Hydrazide, and Phthalic Anhydride in waste piles (discontinued 1-3-83). Any resulting groundwater contamination should be intercepted by Catawba Creek at Extreme back of property.

01 B. SURFACE WATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Overland runoff to Catawba Creek, particularly from previous waste piles

01 C. CONTAMINATION OF AIR 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Not suspected at this time.

01 D. FIRE/EXPLOSIVE CONDITIONS 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Not suspected at this time.

01 E. DIRECT CONTACT 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

In area of previous waste pile

01 F. CONTAMINATION OF SOIL 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION

In area of previous waste pile and downgradient of same

01 G. DRINKING WATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Not suspected at this time

01 H. WORKER EXPOSURE/INJURY 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

In area of previous waste pile

01 I. POPULATION EXPOSURE/INJURY 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Not suspected at this time.



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS**

I. IDENTIFICATION	
01 STATE NC	02 SITE NUMBER D003164464

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

Not suspected at this time.

01 K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION *(Include name(s) of species)*

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

Not suspected at this time.

01 L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

Not suspected at this time.

01 M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff/standing liquids/leaking drums)
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: Not legible) POTENTIAL ALLEGED

Waste piles of Thiram, Maleic Hydrazide, and Phthack Anhydride previously operated on site

01 N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

Not suspected at this time.

01 O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

Not suspected at this time.

01 P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

Waste piles were not necessarily illegal or unauthorized and have been removed.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None suspected at this time.

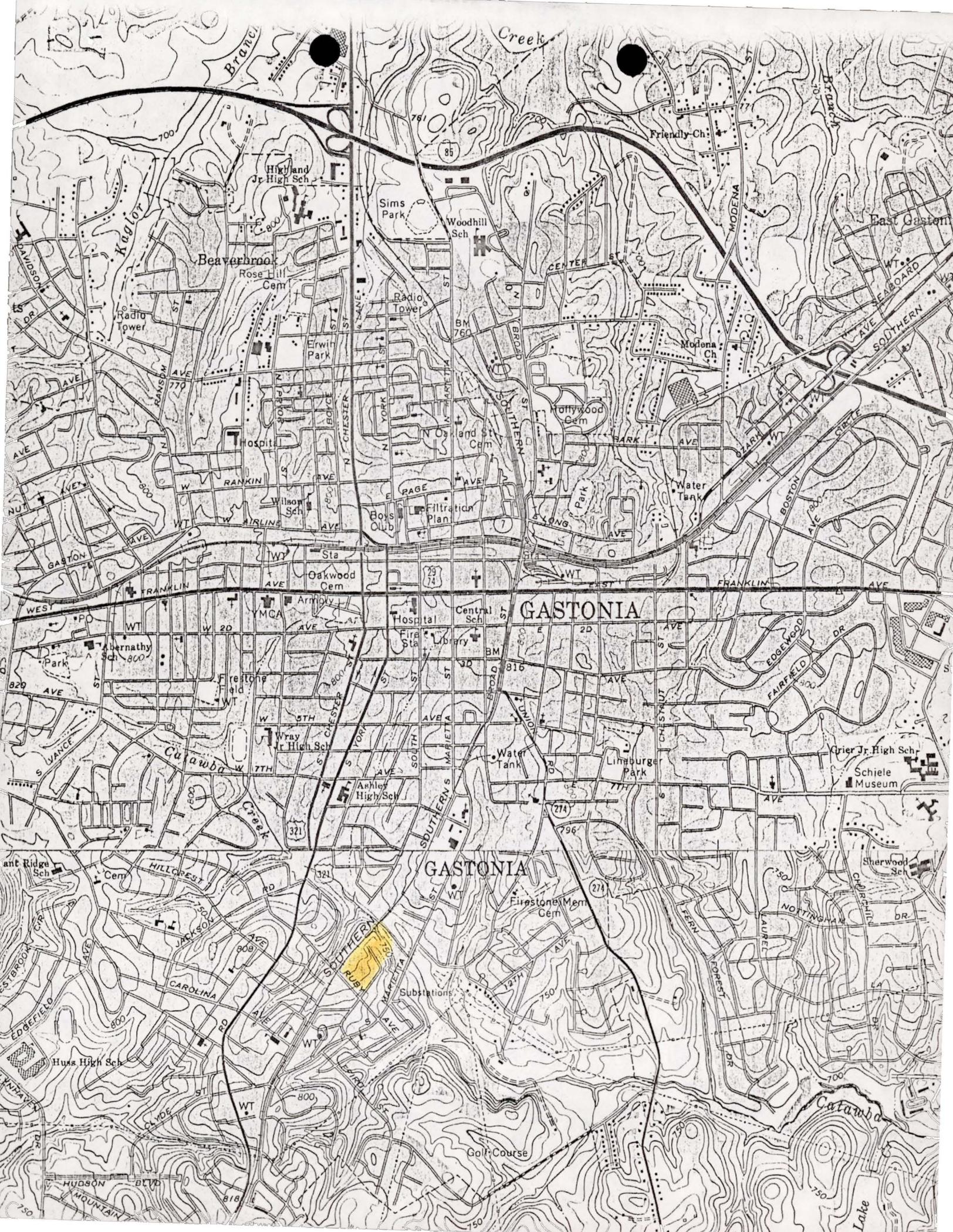
III. TOTAL POPULATION POTENTIALLY AFFECTED: 0-100

IV. COMMENTS

Handling of hazardous substances between 1955 and RCRA notification needs to be determined.
Area of former waste piles should be investigated to determine adequacy of removal/cleanup.

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

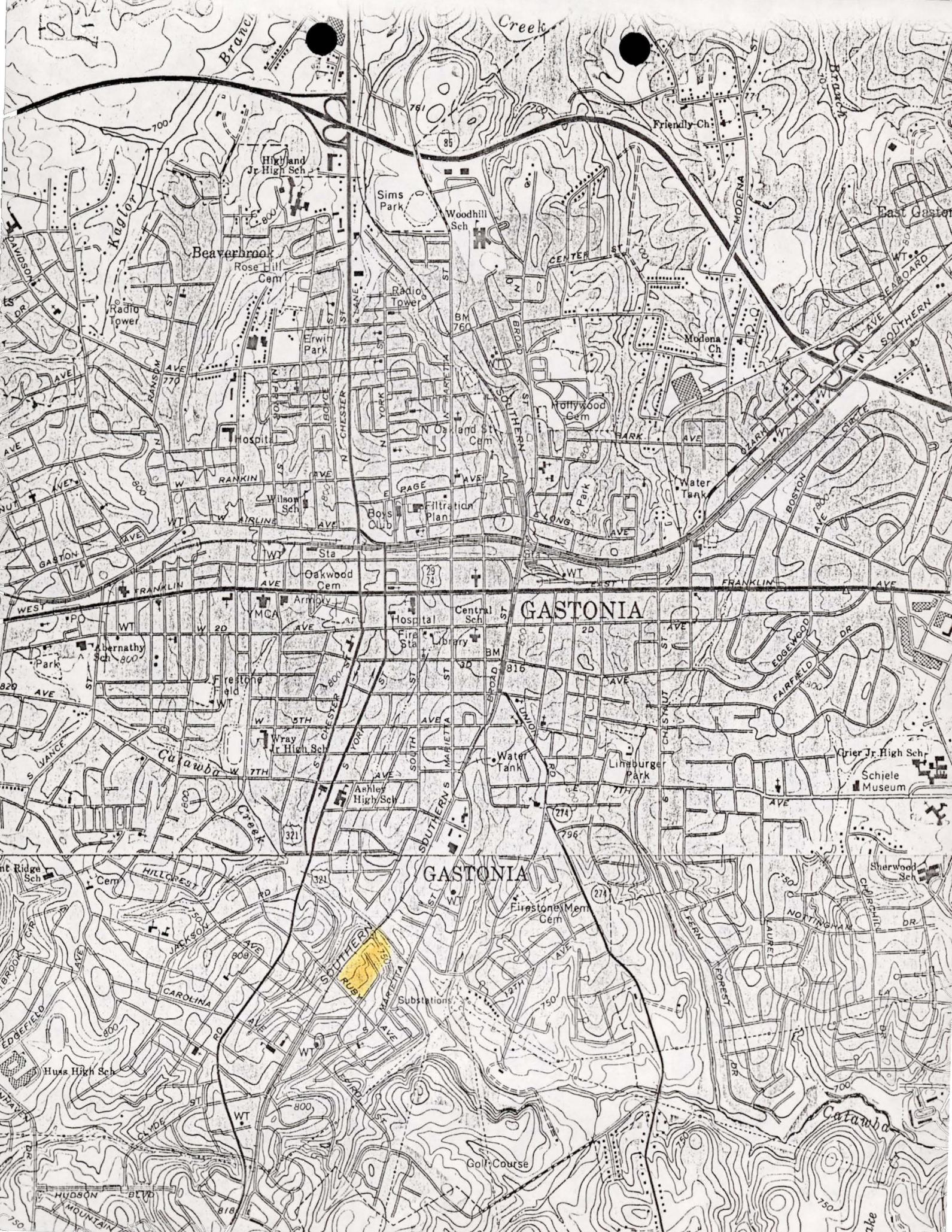
See: Part 2 - Waste Information
VI-Sources of Information



Beaverbrook

GASTONIA

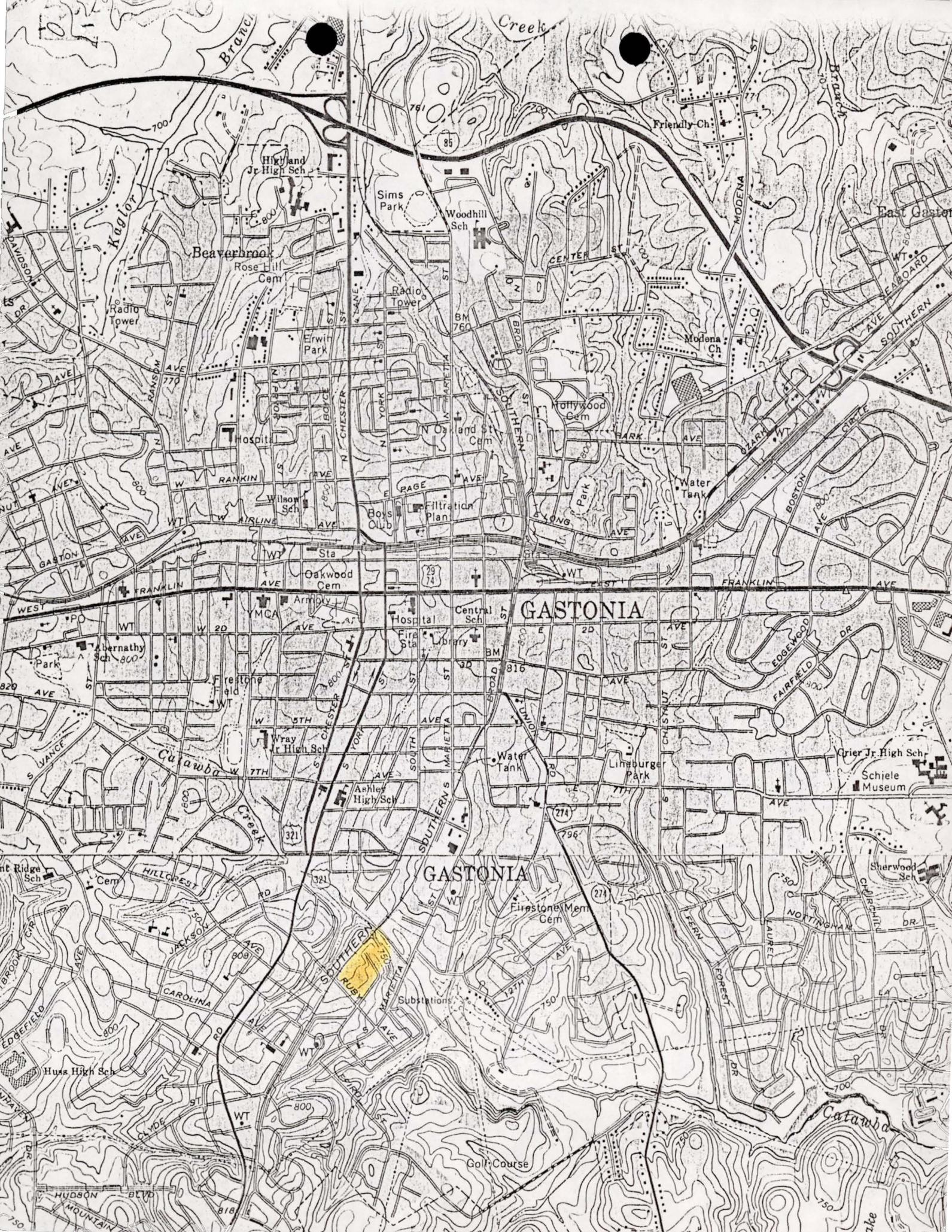
GASTONIA



Beaverbrook

GASTONIA

GASTONIA



UNIROYAL

UNIROYAL CHEMICAL

Division of Uniroyal, Inc.
214 West Ruby Avenue
P.O. Box 2337
Gastonia, North Carolina 28053-2337



704-864-3411

October 25, 1984

Mr. Lenox E. Bramble
Environmental Engineer
Solid & Hazardous Waste Management Branch
Division of Health Services
P. O. Box 2091
Raleigh, North Carolina 27602-2091

Dear Mr. Bramble:

In answer to your letter of September 28, 1984, I will provide the information in the same numerical order as presented in your request.

1. Waste storage, treatment, and disposal practices of RCRA hazardous wastes. Include types, amounts, transporters, and disposal locations and dates for each waste.
 - (A) RCRA Hazardous Waste.
 - 3/23/79 laboratory waste and oil, 37,810 pounds, flammable liquid.
transporter: Roebuck Systems.
disposer: Roebuck Systems, Roebuck, South Carolina
 - 10/16/80 laboratory waste and oil, 15,660 pounds, flammable liquid.
transporter: A-1 Pumping Service
disposer: ABCO Industries, Roebuck, South Carolina
 - 3/25/83 laboratory waste and oil, 18,350 pounds, flammable liquid.
transporter: A-1 Pumping Service
disposer: ABCO Industries, Roebuck, South Carolina
 - 11/1/83 (a) DNBP - P020, 18,800 pounds, poison B
(b) Alpha-Naphthylamine U-167, 392 pounds, poison B
transporter: Bryson Industrial Services, Inc.
disposer: SC-SCA Services, Pinewood, South Carolina
 - 11/2/83 laboratory waste and oil, 7,175 pounds, flammable liquid.
transporter: A-1 Pumping Service
disposer: ABCO Industries, Roebuck, South Carolina

Mr. Lenox E. Bramble
Division of Health Services
Raleigh, North Carolina

Page 2

October 25, 1984

Other waste we have disposed are not RCRA hazardous waste. Storage of hazardous waste in the past on our Plant premises has been confined to laboratory waste, which was stored in 55 gallon DOT 17-E drums, on a covered, diked concrete slab. At the present time, we do not store RCRA hazardous waste.

2. Waste storage, treatment, and disposal practices for other toxic or hazardous substances not regulated by RCRA but designated as a hazardous substance under CERCLA (example PCBs). Include types, amounts, transporters, and disposal locations and dates for each waste.
(A) None.
3. Information concerning releases of CERCLA hazardous substances at your plant site such as spills of feedstocks, waste waters, materials at transfer areas, leaking storage tanks, and other waste handling and/or recovery areas with descriptions of any remedial actions undertaken.
On May 29, 1974 there was a release of approximately 25 gallons of 2,4 dinitro butyl phenol from a containment sump to the municipal sewer. There was an investigation by the North Carolina Water Quality Section. Their report is on file with the Water Quality Section, Division of Environmental Management. The investigation concluded that there was no lasting effect of the release. Uniroyal reimbursed the State for the cost of the investigation and the cost of replacing fish killed as a result of the municipal sewage treatment plant releasing treated water contaminated with DNBP.
Immediately after this release the drain line from the containment sump to the sewer line was sealed with concrete.
4. Any chemical analysis results indicating soil, groundwater, or surface water contamination as a result of hazardous substance releases that have occurred. Identify locations of any groundwater monitoring wells or other sampling points used to monitor areas of potential concern.
Analysis of the above is included in the investigator's report.
5. Provide a chronological history of site owners and/or operators where applicable. Uniroyal, Incorporated has been the site owner and operator since the Plant was built.

Mr. Lenox E. Bramble
Division of Health Services
Raleigh, North Carolina

Page 3

October 25, 1984

6. Include copies of any notifications of correspondence made to the United States Environmental Protection Agency or the State of North Carolina in reference to possible CERCLA site activities and/or releases.
No reports made.
7. Provide a general description of plant operations and processes.
The Uniroyal Chemical Plant in Gastonia, North Carolina manufactures urethane pre-polymers, formulates agriculture chemicals (pesticides), manufactures surface active agents and fabricated products (plastic drum covers and rubber labels).

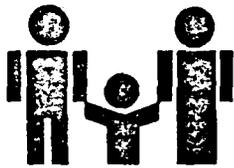
The Plant has an excellent spill prevention plan. All areas where spills or releases may occur are on slabs and diked. This includes manufacturing areas, storage areas, and truck loading and unloading stations.

Sincerely,



John W. Robinson, Jr.
Technical Supervisor

JWR/dm



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

September 28, 1984

Mr. John Robinson
Technical Supervisor
Uniroyal Inc., Uniroyal Chemical Div.
P.O. Box 2337
Gastonia, NC 28053

Dear Mr. Robinson:

As a follow-up to our telephone conversation on September 26, 1984, I would like to request information concerning the Uniroyal Chemical Division site in Gastonia. The Solid and Hazardous Waste Management Branch is evaluating a list of potential problem sites compiled under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Program.

Please provide any documentation or explanations that would describe the following activities since the start-up of operations at your plant site:

1. Waste storage, treatment, and disposal practices of RCRA hazardous wastes. Include types, amounts, transporters, and disposal locations and dates for each waste.
2. Waste storage, treatment, and disposal practices for other toxic or hazardous substances not regulated by RCRA but designated as a hazardous substance under CERCLA (example PCBs). Include types, amounts, transporters, and disposal locations and dates for each waste.
3. Information concerning releases of CERCLA hazardous substances at your plant site such as spills of feedstocks, waste waters, materials at transfer areas, leaking storage tanks, and other waste handling and/or recovery areas with descriptions of any remedial actions undertaken.
4. Any chemical analysis results indicating soil, groundwater, or surface water contamination as a result of hazardous substance releases that have occurred. Identify locations of any groundwater monitoring wells or other sampling points used to monitor areas of potential concern.

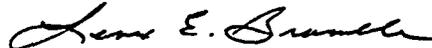
5. Provide a chronological history of site owners and/or operators where applicable.
6. Include copies of any notifications of correspondence made to the United States Environmental Protection Agency or the State of North Carolina in reference to possible CERCLA site activities and/or releases.
7. Provide a general description of plant operations and processes.

This information will be used to assess and process this site through the RCRA Section 3012 System. The information will be on file at the North Carolina Solid and Hazardous Waste Management Branch 3012 Office and copies will be forwarded to the United States Environmental Protection Agency, Region IV, in Atlanta, Georgia, in the near future.

Your assistance in compiling this information is very much appreciated. Please contact me at (919) 733-2178 if you are not able to complete this information request within the next four weeks. I am enclosing information on the RCRA 3012/CERCLA Program for your use.

If you have questions or if I can be of any assistance, please contact me.

Sincerely,



Lenox E. Bramble
Environmental Engineer

Solid & Hazardous Waste Mgt. Branch
Environmental Health Section

LEB:lw/1299A

CALLED JOHN ROBINSON 1:45 9/26/84
NOT IN - LEFT MESSAGE TO CALL
ME BACK IN MORNING
CALLED BACK 9/26/84 2:10

SPIN TO CREEK

UNIROYAL
GASTONIA

ESTABLISHED
1955

BRAMBLE
9/26/84

(704) 864-3411

JOHN ROBINSON - TECHNICAL SUPERVISOR

- INFER OF HERBICIDES, GROWTH REGULANTS, FUNGICIDES,
POLY-URETHANE PRE-POLYMERS, RUBBER LABORS, PLASTIC
LAB WASTE FROM QUALITY CONTROL TESTS DRUM
COVERS

P000

P001 IGNITABLE

IGNITIBLE + TOXIC

WASTE PILES (REVISED PART A
DELETED JAN 1983)

- P117 ✓ THIURAM ^{TOXIC} SOL POWDER WASTE PILE
- U148 ✓ MALEIC HYDRAZIDE ^{SOL CRYSTALS} TOXIC 11
- U190 ✓ PHTHALIC ANHYDRIDE ^{CRYSTALLINE NEEDLES} SOL TOXIC IRRITANT
- U002 ACETONE ^{FLAMMABLE} TOXIC LIQUID SOL DRUM
- U044 CHLOROFORM ^{LIQUID SLIGHTLY SOL} TOXIC
- U122 FORMALDEHYDE ^{SOL} TOXIC
- U154 METHANOL ^{LIQUID} FLAMMABLE TOXIC SOL
- U167 1-NAPHTHYLAMINE ^{COMBUSTIBLE} TOXIC
- U223 TOLUENE DIISOCYANATE ^{SOL} COMBUSTIBLE TOXIC
- U239 XYLENE ^{FLAMMABLE} TOXIC SOL
- U196 PYRIDINE ^{IGNITIBLE} TOXIC SOLVENT
- U159 METHYL ETHYL KETONE (MEK) ^{SOL} IGNITIBLE FLAMMABLE
- P020 Z-SEC-BUTYL-4,6-DINITROPHENOL ^{TOXIC} IRRITANT ^{FIRE RISK}



6. Kings Mountain Office
(See Map on Reverse Side)

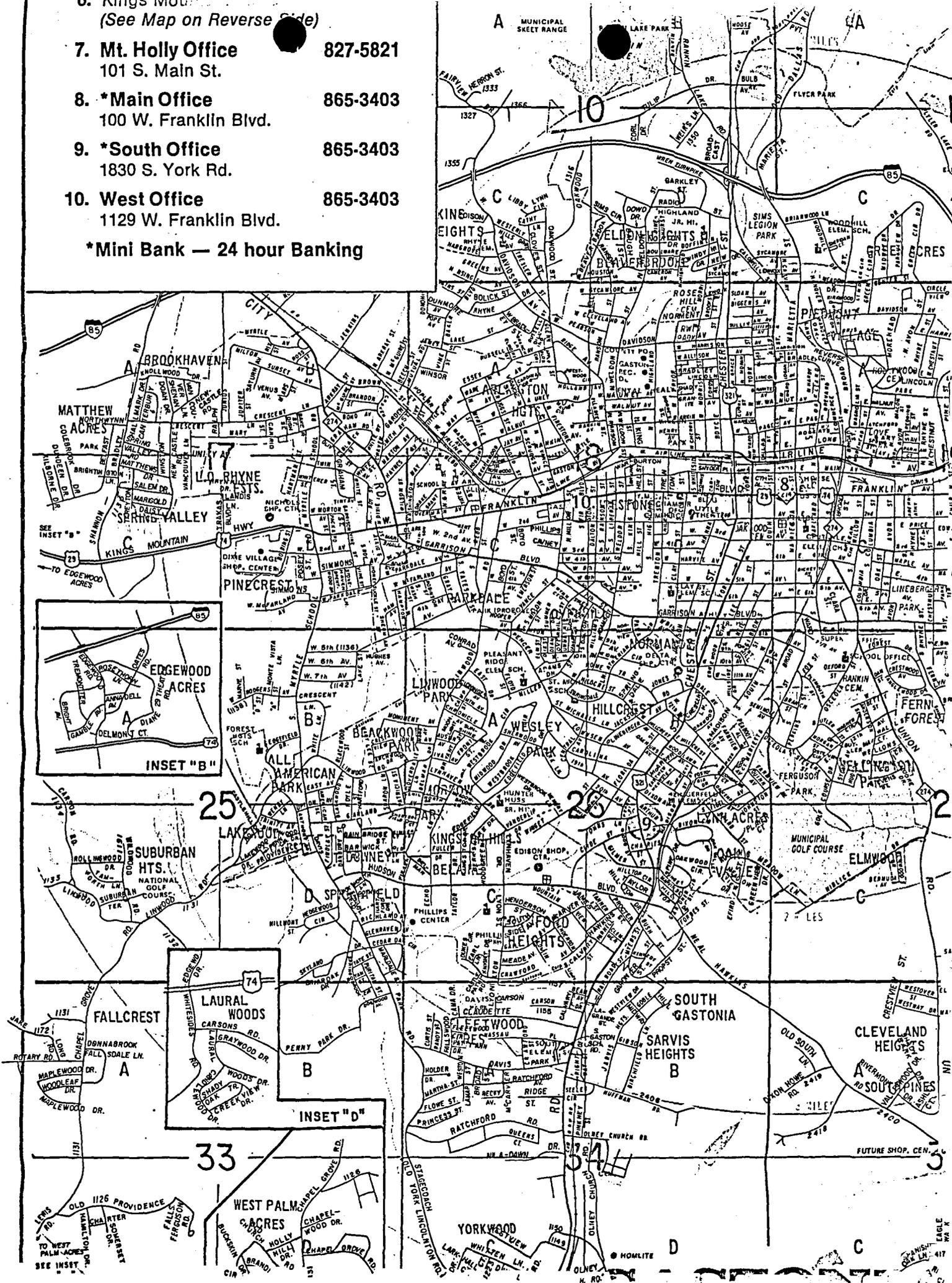
7. Mt. Holly Office 827-5821
101 S. Main St.

8. *Main Office 865-3403
100 W. Franklin Blvd.

9. *South Office 865-3403
1830 S. York Rd.

10. West Office 865-3403
1129 W. Franklin Blvd.

*Mini Bank — 24 hour Banking



UNIROYAL

UNIROYAL, Inc.
World Headquarters
Middlebury, Connecticut 06749
(203) 573-3837
July 9, 1984

Mr. Keith Lawson
Solid and Hazardous Waste Management Branch
Division of Health Services
P. O. Box 2091
Raleigh, North Carolina 27602

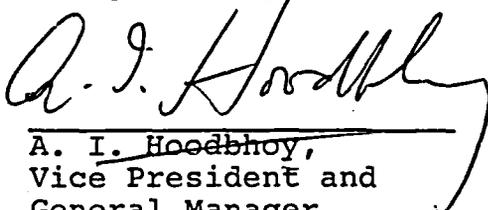
RE: Part B Permit Submittal
NCD003164464

Dear Mr. Lawson:

This letter is to confirm that the Uniroyal Chemical Plant, located at 214 West Ruby Avenue in Gastonia, North Carolina does not require a Part B permit for storage of hazardous waste in containers for over ninety (90) days, and, therefore, will not be submitting a Part B permit application. Although we originally filed as a TSD facility, we have since ceased this form of activity.

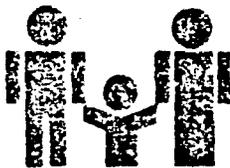
Sincerely,


W. F. Broden, Manager
Energy & Environmental
Engineering


A. I. Hoedbhoy,
Vice President and
General Manager
Specialty Chemicals

WFB:sml





Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

June 19, 1984

Mr. John Robinson
Uniroyal, Inc., Uniroyal Chemical Div.
P.O. Box 2337
Gastonia, N.C. 28053

RE: NCD003164464

Dear Mr. Robinson:

On or before November 19, 1980, your company's plant at Gastonia, notified the United States Environmental Protection Agency that it was a hazardous waste treatment, storage, or disposal (TSD) facility, and applied for "interim status" under the Resource Conservation and Recovery Act (RCRA) by filing part A of a permit application.

Our office is aware that many industries filed as TSD facilities but subsequently ceased this form of activity. We understand that this is the case with your plant, so that it is not presently operating as a TSD facility.

We are in the process of permitting those plants which need to operate as TSD facilities. Concurrently, we wish to terminate interim status for all facilities which do not seek a permit.

The regulations which apply to termination of interim status are very specific and inflexible. According to 40 CFR 270.73 (adopted in North Carolina as 10 NCAC .0034[g]), interim status may be terminated only when:

- (a) Final administrative disposition of a permit application is made;
- or
- (b) Interim status is terminated as provided in 40 CFR 270.10(e)(5) (adopted in North Carolina as 10 NCAC 10F .0034[b]).

The regulation cited here reads as follows:

"Failure to furnish a requested part B application on time, or to furnish in full the information required by the part B application is grounds for termination of interim status under Part 124."

We recognize that, for sound reasons, your facility management has elected not to operate as a TSD facility. But, for the reasons given above, if we wish to terminate interim status for this plant, we must call for submission of a Part B application.

Mr. John Robinson
Page 2
June 19, 1984

We assume that this procedure will be only a formality, and that you will probably choose not to submit part B. However, you do have the option of preparing and submitting part B if you wish.

In either case, whether you choose to file a part B application or not, we ask that you notify our office of your intention to submit part B or not to submit it within 30 days of receipt of this letter. The notice of your intent should be signed by a corporate officer, of a least vice president level. Please send your reply to Mr. Keith Lawson, Solid and Hazardous Waste Management Branch, Division of Health Services, P.O. Box 2091, Raleigh, N.C. 27602.

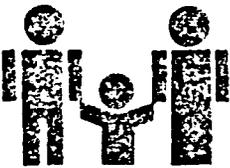
Please feel free to call or write us if you have any questions. Our number is (919) 733-2178

Very sincerely,



O.W. Strickland, Head
Solid & Hazardous Waste Management
Branch, Environmental Health Section

OWS:cew/0918A



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Robinson
Uniroyal, Inc., Uniroyal Chemical Div.
P.O. Box 2337
Gastonia, N.C. 28053

Re: NCD003164464

Dear Mr. Robinson:

The United States Environmental Protection Agency has granted the State of North Carolina Solid and Hazardous Waste Management Branch Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

This letter constitutes a formal request for Part B of your application for a hazardous waste facility permit for () treatment (X) storage in (X) containers () tanks () incinerator. This request is made under the authority of North Carolina Administrative Code 10F. 0034(b)(1) which adopts by reference 40 CFR 270.10(e).

Four copies of the completed Part B application must be submitted to the Solid and Hazardous Waste Management Branch no later than six months (180 days) from the date of your receipt of this request. Failure to furnish a requested Part B application on time is grounds for termination of interim status or assessment of an administrative penalty.

The mailing address for submission of the Part B application is:

G. W. Strickland, Head
Solid and Hazardous Waste Management Branch
Environmental Health Section
Department of Human Resources
P. O. Box 2091
Raleigh, North Carolina 27602

Please write Mr. Keith Lawson at the address above, or call us at (919) 733-2178 if you have any questions.

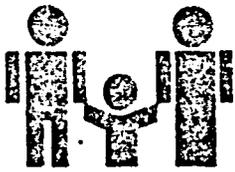
Sincerely,


G. W. Strickland, Head

Solid & Hazardous Waste Management Branch
Environmental Health Section



OWS:cew/0692A



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

Date: 11-23-83

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: Kamy Fox
Environmental Chemist

NAME: Uniroyal Inc. - Uniroyal Chemical
Gastonia (City)

EPA ID No.: NCD 003164464

A RCRA Generator, () Transporter, () Interim Status, () Final Status;
compliance inspection was conducted on 11/22/83. The in-
mo/day/yr

spection can be classified as a annual inspection (Gen, Trans.),

semi-annual inspection (TSD), () follow-up inspection, other,

specify Keith Lawson asked to check on this facility since they requested
on 9-30-83 to be deleted as a storer; therefore, an inspection was made
to determine if facility was storing any hazardous waste

The above subject company was found in full compliance () in violation

() all previous violations existing () previous violations existing along

with additional ones. (Note: You should complete a check sheet to signify
the additional violations).

GENERATOR INSPECTION FORM - PART 262

Universal Inc. - Universal Chemical NCD003164464 EPA I.D. Gaston County

Name of Site P.O. Box 23137 Location 214 W. Ruby Ave., Gastonia, N.C. 28053 Inspection Date 11-22-83 Signature of Inspector(s) [Signature]

Compliance Date Signature of Facility Contact [Signature]

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
Subpart D waste (b)
Subpart C waste (c)(1)(2)
2. EPA Identification Numbers
EPA generator number (a)
EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
proper manifest (a)
permitted facility (b)
4. Required Information (262.21)
document number (a)(1)
generator identification (a)(2)
transporter identification (a)(3)
facility identification (a)(4)
D.O.T. description (a)(5)
total quantity (a)(6)
certification (b)
5. Number of Copies (262.22)
minimum number
6. Use of the Manifest (262.23)
generator handwritten signature (a)(1)
transporter signature/date (a)(2)
retain copy (a)(3)
copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
D.O.T. compliance
8. Labeling (262.31)
D.O.T. compliance
9. Marking (262.32)
D.O.T. compliance (a)
HAZARDOUS WASTE label (b)
10. Placarding (262.33)
D.O.T. compliance
11. Accumulation Time (262.34)
Subpart I; J (a)(1)
accumulation date (a)(2)
Hazardous Waste (a)(3)
Subpart C; D (a)(4)*
personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
manifest retention (a)
annual/exception report (b)
test/waste analysis (c)

Union-Pac. Inc. - Denver, C. - near
Canton, N. C.
11-22-83

John W. Bonner, Jr.

13. Annual Reporting (262.41)

- submitted (a)(1-6)
- submitted (b)

14. Exception Reporting (262.42)

- transporter contact (a)
- exception report (b)(1)(2)

REMARKS: In full compliance. Facility was a
Generator & Storer classification but requested
on 9-30-83 to be deleted as a storer status
now only a Generator status.

UNIROYAL

UNIROYAL CHEMICAL
Division of Uniroyal, Inc.
214 West Ruby Avenue
P.O. Box 2337
Gastonia, North Carolina 28053-2337

704-864-3411

September 30, 1983

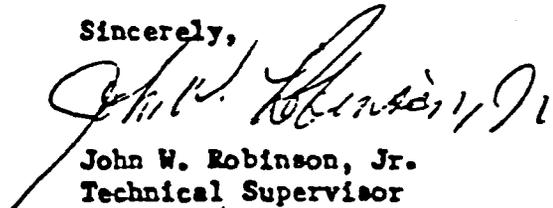
Mr. J. Rhodes
Solid And Hazardous Waste Management Branch
Environmental Health Section
Department Of Human Resources
P. O. Box 2091
Raleigh, North Carolina 27602

Dear Mr. Rhodes:

The Uniroyal Chemical Plant, located on 214 West Ruby Avenue in Gastonia, North Carolina (NCD003164464), has reviewed its' current needs with respect to the North Carolina Hazardous Waste Management Program and has decided to withdraw it's request for a Part B permit for storage of hazardous waste in containers for over ninety days. This determination was based on our ability to properly dispose of our hazardous wastes generated within the prescribed ninety day time period, at RCRA permitted commercial treatment and disposal operations.

Please call if I can be of further assistance in this matter.

Sincerely,



John W. Robinson, Jr.
Technical Supervisor

JWR:ev



OK

UNIROYAL CHEMICAL
Division of Uniroyal, Inc.
214 West Ruby Avenue
P.O. Box 2337
Gastonia, North Carolina 28053-2337
704-864-3411

September 30, 1983

Mr. J. Rhodes
Solid And Hazardous Waste Management Branch
Environmental Health Section
Department Of Human Resources
P. O. Box 2091
Raleigh, North Carolina 27602



Dear Mr. Rhodes:

The Uniroyal Chemical Plant, located on 214 West Ruby Avenue in Gastonia, North Carolina (NCD003164464), has reviewed its' current needs with respect to the North Carolina Hazardous Waste Management Program and has decided to withdraw it's request for a Part B permit for storage of hazardous waste in containers for over ninety days. This determination was based on our ability to properly dispose of our hazardous wastes generated within the prescribed ninety day time period, at RCRA permitted commercial treatment and disposal operations.

Please call if I can be of further assistance in this matter.

Sincerely,

John W. Robinson, Jr.
John W. Robinson, Jr.
Technical Supervisor

JWR:ew

*Keith: hold for Larry
to inspect. JR*



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

June 7, 1983



Mr. John Robinson
Uniroyal, Inc. - Uniroyal
Chemical
P.O. Box 2337
Gastonia, NC 28052

RE: NCD003164464

Dear Mr. Robinson:

On May 19, 1983 Mr. Larry Fox of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. You were found to be in compliance with the standards.

This office wishes to thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

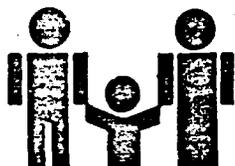
Sincerely,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: Mr. Larry Fox





W. H. P. / dgh
Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
WESTERN REGIONAL OFFICE
Building 3
Black Mountain, N.C. 28711
(704) 669-3349

June 1, 1983

TO: O. W. Strickland
Solid & Hazardous Waste Mgt.

FROM: Larry Fox *LF*
Western Regional Office

RE: RCRA Inspection:

Uniroyal, Inc. - Uniroyal Chemical
214 W. Ruby Avenue
P. O. Box 2337
Gastonia, NC 28052
EPA ID #NCD003164464
Contact: John Robinson
Technical Supervisor



An RCRA inspection was conducted on May 19, 1983 and the facility was found to be in full compliance.

LOF/dgh

RCRA INSPECTION FORM

Universal Inc. - Universal Chemical NCD 002167464 Greene
 Name of Site P.O. Box 2337 EPA I.D. 28052 County

214 W. Ruby Ave., Gastonia, N.C. Location Inspection Date 5-19-83 Signature of Inspector(s) [Signature]

Compliance Date _____ Signature of Facility Contact [Signature]

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

GENERATOR STANDARDS (262.00)

	C	NC	NA	Violation(s)
1. GENERAL (.10-.12)	✓			
2. THE MANIFEST (.20-.23)	✓			
3. PRE-TRANSPORT REQUIREMENTS (.30-.34)	✓			
4. RECORDKEEPING/REPORTING (.40-.43)	✓			
5. SPECIAL CONDITIONS (.50-.51)			✓	

TRANSPORTER STANDARDS (263.00)

1. GENERAL (.11-.12)				
2. MANIFEST/RECORDKEEPING (.20-.22)				
3. HAZARDOUS WASTE DISCHARGES (.30-.31)				

N/A

TSDF STANDARDS (265.00)

1. GENERAL (.1-.4)	✓			
2. GENERAL FACILITY STANDARDS (.10-.17)	✓			
3. PREPAREDNESS AND PREVENTION (.30-.37)	✓			
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES (.50-.56)	✓			
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (.70-.77)	✓			
6. GROUND-WATER MONITORING (.90-.94)			✓	
7. CLOSURE AND POST-CLOSURE (.110-.120)	✓			
8. FINANCIAL REQUIREMENTS (.140-.145)	✓			
9. USE AND MANAGEMENT OF CONTAINERS (.170-.177)	✓			
10. TANKS (.190-.199)			✓	
11. SURFACE IMPOUNDMENTS (.220-.230)			✓	
12. WASTE PILES (.250-.257)			✓	
13. LAND TREATMENT (.270-.282)			✓	
14. LANDFILLS (.300-.315)			✓	
15. INCINERATORS (.340-.351)			✓	
16. THERMAL TREATMENT (.370-.382)			✓	
17. CHEM., PHYS./BIO. TREATMENT (.400-.406)			✓	
18. UNDERGROUND INJECTION (.430)			✓	

RCRA STATUS

GENERATOR TRANSPORTER TREATER STORER DISPOSER

IMMINENT HAZARD: YES NO

RCRA INSPECTION

Facility Information

Uniroyal Inc. - Uniroyal Chemical
214 W. Ruby Avenue
P. O. Box 2337
Gastonia, NC 28052
Gaston County
EPA ID #NCD003164464

Responsible Official

John Robinson, Technical Supervisor
704/864-3411

Survey Participants

John Robinson
Joanna Miller
Larry Fox

Date of Inspection

May 19, 1983
1:30 - 3:30 pm

Applicable Regulations

No Change

Purpose of Survey

No Change

Facility Description

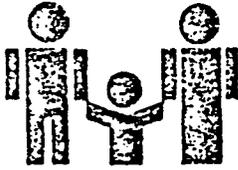
No Change

Documentation of Site Deficiencies

None

Compliance Schedule/Recommendations

None - in full compliance



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 17, 1983

*Uniroyal Chem.
Atlanta*

Doug McCurry, Chief
Waste Engineering Section
Residuals Management Branch
EPA - Region IV
345 Courtland Street, NE
Atlanta, GA 30365

RE: UNIROYAL CHEMICAL
NCDOO3164464

Dear Doug:

Attached is Part A application/amendment. Please process it.

Cordially yours,

O. W. Strickland

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS/EB:kra

Attachments



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 17, 1983

UNIROYAL CHEMICAL
ATTN: John W. Robinson, Jr.
214 West Ruby Avenue
Gastonia, NC 28052

RE: UNIROYAL CHEMICAL
NCDO03164464

Dear Mr. Robinson:

We have received your revised Part A application and accept the revisions requested.

Cordially yours,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS/EB:bb

cc: Doug McCurry, Chief
Residuals Management Branch
Waste Engineering Section





UNIROYAL CHEMICAL
Division of UNIROYAL, Inc.
214 West Ruby Avenue
Gastonia, North Carolina 28052

704-864-3411

January 3, 1983

Mr. Jerry Rhodes
Environmental Chemist
Solid & Hazardous Waste Management Branch
Environmental Health Section
P. O. Box 2091
Raleigh, North Carolina, 27602

Dear Mr. Rhodes:

Mr. Rick Doby telephoned and advised me to amend our application for a permit to store hazardous waste. Attached, you will find the corrected pages. On Page Three (3), you will note that we have deleted all but one hazardous waste. Most of the wastes described in the initial application are actually contained in D000 and D001. This material is lab waste from our quality control tests. It has been analyzed and found to be ignitable and toxic. The wastes which are designated as being stored in waste piles has been determined to be non-hazardous, although we do dispose of this waste at an EPA approved disposal site.

If you require that we fill out a complete application, we will be glad to do so if you will send us a blank application.

If you have any questions, please call me at (704) 864-3411.

Sincerely,

John W. Robinson, Jr.
John W. Robinson, Jr.
Technical Supervisor

JWR:ew

cc: Ron Lak

Attachments

P-3
P-4

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr, mo, & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
80	5	1

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete item 1 above)

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

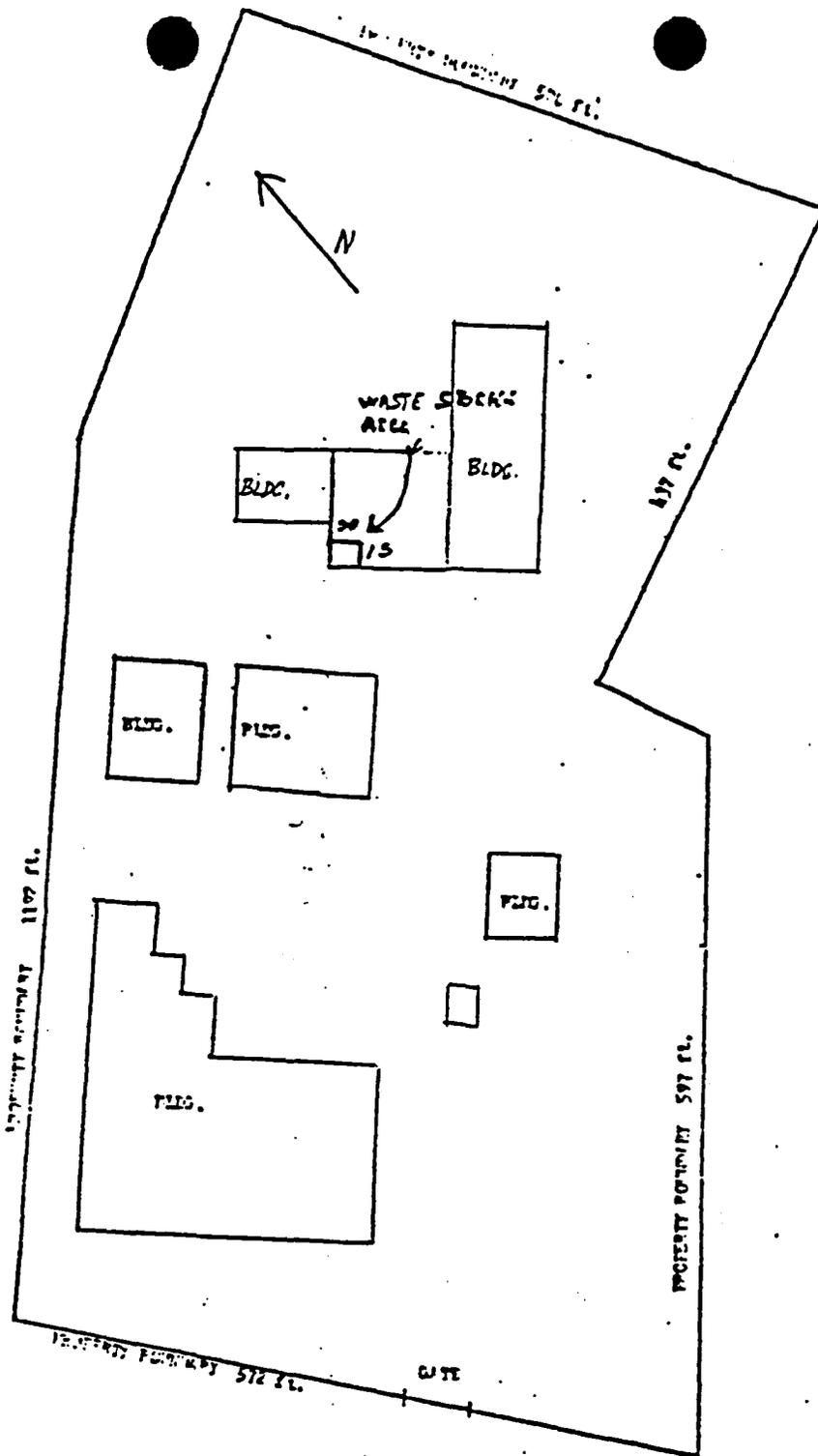
- AMOUNT - Enter the amount.
- UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	M		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

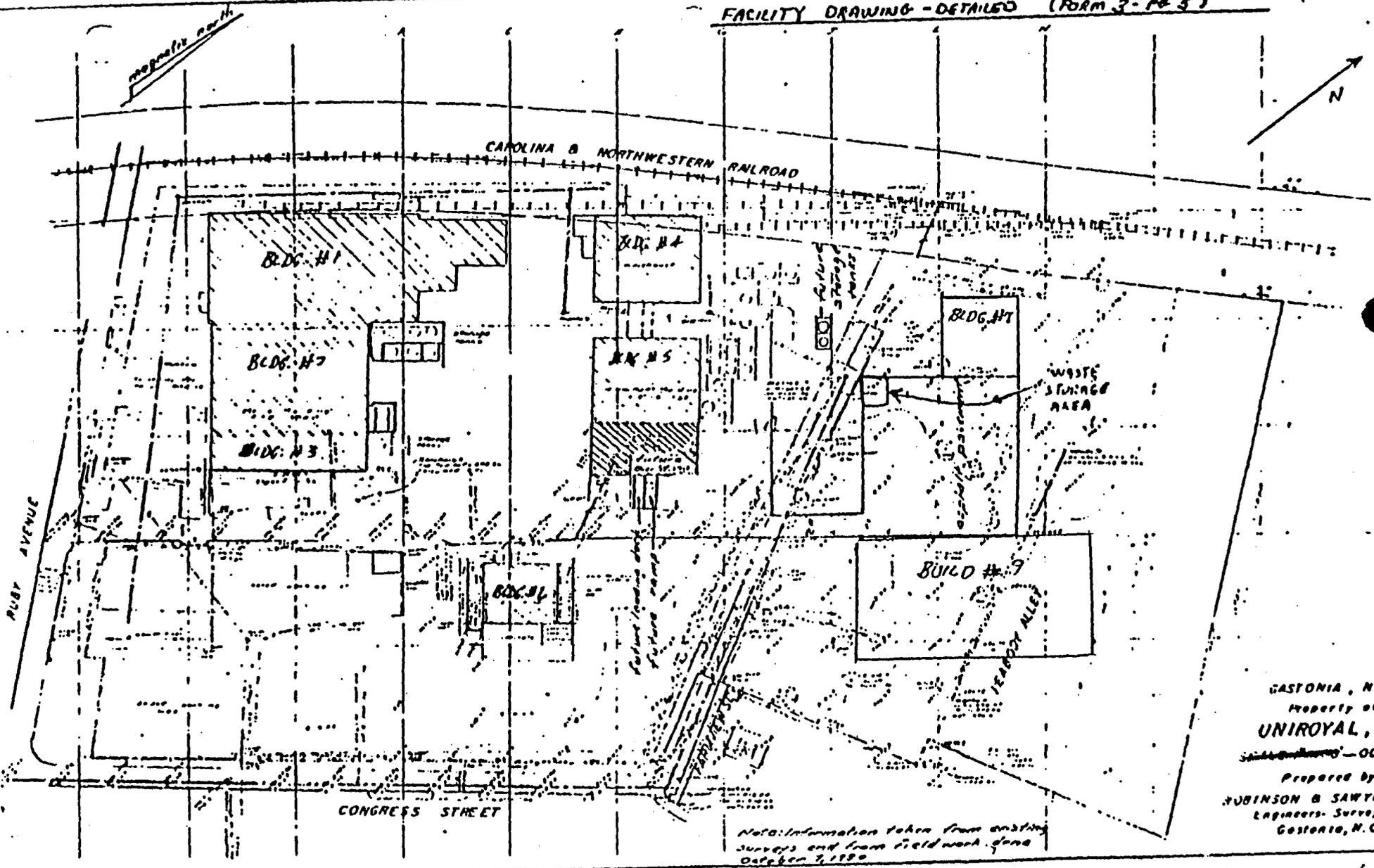
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	3000	G		7				
2	S 0 3	150 DELETE	Y		8				
3					9				
4					10				



SCALE 1 INCH = 158 FE.

NOTE: SEE ALSO DETAILED MAP ATTACHED

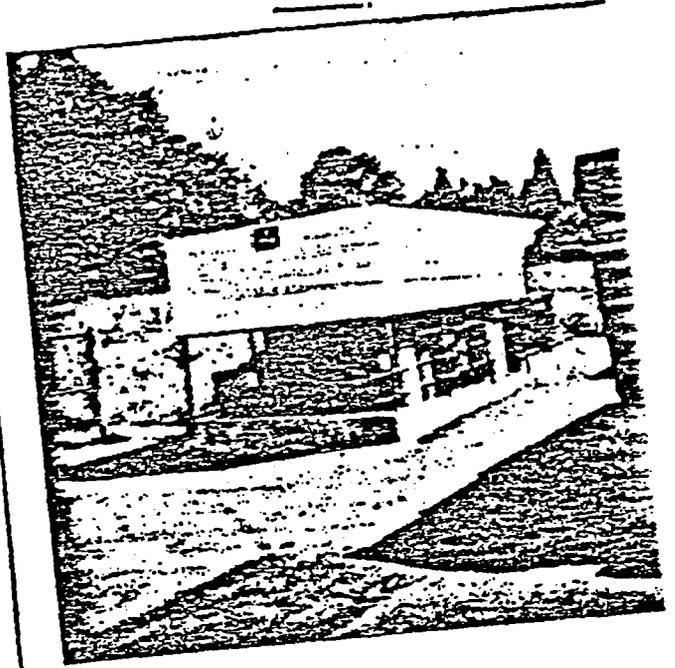
FACILITY DRAWING - DETAILED (FORM 3-M-5)



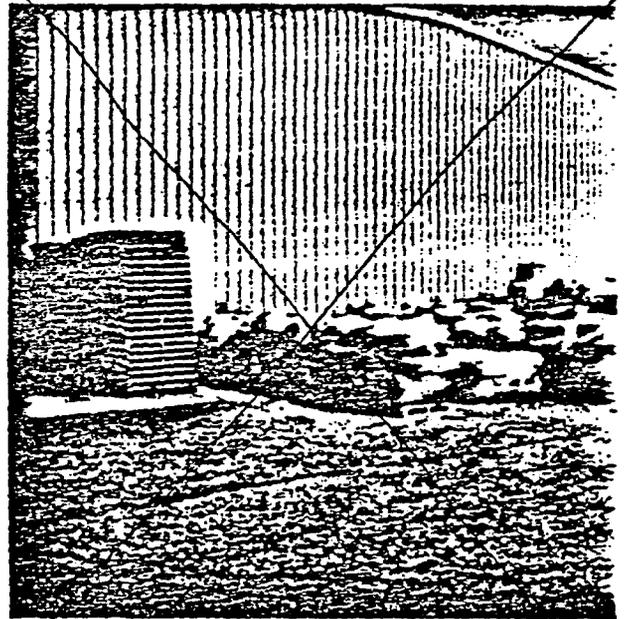
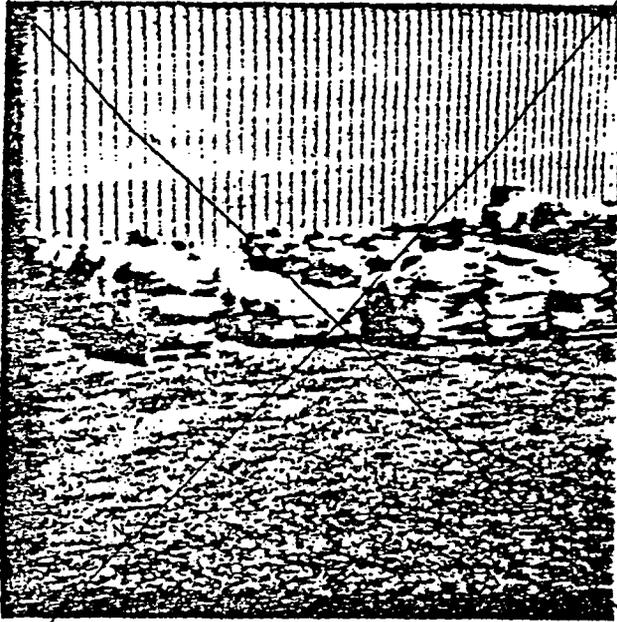
GASTONIA, N.C.
 Property of
UNIROYAL, INC.
 Surveyed - OCT 22, 1950
 Prepared by
 ROBINSON & SAWYER, INC.
 Engineers-Surveyors
 GASTONIA, N.C.

Note: Information taken from existing surveys and from field work done October 2, 1950

AMENDED 1/3/53
 JWR



DRUM STORAGE AREA



~~WASTE PILE DELETE~~



STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Division of Health Services

P. O. Box 2091

Raleigh 27602

JAMES B. HUNT, JR.
GOVERNOR

SARAH T. MORROW, M.D., M.P.H.
SECRETARY

XXXXXXXXXXXXX
Director

Ronald H. Levine, M.D.
Acting Director

October 12, 1981

Mr. John Robinson
UNIROYAL, INC.
214 W. Ruby Avenue
Box 2337
Gastonia, NC 28052

Dear Mr. Robinson:

A record review conducted on September 21, 1981 indicated that your facility has corrected the deficiencies identified on a September 1, 1981 RCRA inspection.

Thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "O. W. Strickland".

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: Mr. Rick Doby



STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Division of Health Services

P. O. Box 2091

Raleigh 27602

JAMES B. HUNT, JR.
GOVERNOR

SARAH T. MORROW, M.D., M.P.H.
SECRETARY

XXXXXXXXXXXXXXXXXXXX
XXXXXX

Ronald H. Levine, M.D.
Acting Director

October 12, 1981

Mr. John Robinson
UNIROYAL, INC.
214 W. Ruby Avenue
Box 2337
Gastonia, NC 28052

Dear Mr. Robinson:

A record review conducted on September 21, 1981 indicated that your facility has corrected the deficiencies identified on a September 1, 1981 RCRA inspection.

Thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. W. Strickland".

D. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: Mr. Rick Doby



STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Ronald H. Levine, M.D.
Acting Director

JAMES B. HUNT, JR.
GOVERNOR

SARAH T. MORROW, M.D., M.P.H.
SECRETARY

Division of Health Services

WESTERN REGIONAL OFFICE
BUILDING 3
BLACK MOUNTAIN, N.C. 28711

MEMORANDUM



TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: C. Rick Doby, Sr. *CRD*
District Sanitarian

DATE: September 25, 1981

SUBJECT: I.S.S. Final Inspection of: Uniroyal, Inc.
214 W. Ruby Ave., Box 2337
Gastonia, NC 28052
EPA # NCD003164464
Contact: John Robinson, Technical Supervisor

A record review conducted September 21, 1981 of Uniroyal, Inc. indicated that this facility has now complied with all deficiencies as identified on September 1, 1981.

slg



STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Division of Health Services

P. O. Box 2091

Raleigh 27602

XXXXXXXXXXXXXXXXXXXX
XXXXXX

Ronald H. Levine, M.D.
Acting Director

JAMES B. HUNT, JR.
GOVERNOR

SARAH T. MORROW, M.D., M.P.H.
SECRETARY

September 17, 1981

Mr. John Robinson
Uniroyal, Inc.
214 W. Ruby Avenue
Box 2337
Gastonia, NC 28052

Dear Mr. Robinson:

On September 1, 1981, Messrs. Rick Doby and Julian Foscue of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. The following violations were noted.

- (1) Reg. No. 265.13 - General Waste Analyses - Not in Compliance.
Facility must develop and follow a written waste analysis plan.
- (2) Reg. No. 265.16(d)(1) - Personnel Training - Required documents must be maintained at the facility.
- (3) Reg. No. 265.52 - 265.56 - Contingency Plan and Emergency Procedures - Not in Compliance. Facility needs to develop, document, and implement a plan of contingency.

A compliance date of October 1, 1981 was established.

If you have any questions concerning this matter, please contact Mr. William Paige, Environmental Chemist, at (919) 733-2178.

Sincerely,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: Mr. Rick Doby



STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Division of Health Services

WESTERN REGIONAL OFFICE
BUILDING 3
BLACK MOUNTAIN, N.C. 28711

September 9, 1981

JAMES B. HUNT, JR.
GOVERNOR

SARAH T. MORROW, M.D., M.P.H.
SECRETARY

Ronald H. Levine, M.D.
Acting Director



TO: O. W. Strickland, Head
Solid & Hazardous Waste
Management Branch

FROM: C. Rick Doby *CRD*
District Sanitarian
Western Regional Office

SUBJECT: ISS Inspection of:

UNIROYAL, Inc.
214 W. Ruby Avenue, Box 2337
Gastonia, NC 28052
EPA ID #NCD003164464
Contact: John Robinson, Tech. Supvr.

The following violations of ISS for Uniroyal, Inc. were identified during an inspection of September 1, 1981:

Part 265 - Interim Status Standards for TSDF's

- ✓ 1) Reg. No. 265.13 - General Waste Analyses - Not in Compliance.
Facility must develop and follow a written waste analysis plan.
- ✓ 2) Reg. No. 265.16(d)(1) - Personnel Training - Required documents must be maintained at the facility.
- ✓ 3) Reg. No. 265.52 - 265.56 - Contingency Plan and Emergency Procedures - Not in Compliance. Facility needs to develop, document, and implement a plan of contingency.

The following compliance schedule to correct the above violations was agreed to by Uniroyal, Inc.:

All deficiencies will be corrected by October 1, 1981.

CRD/dgh

INSPECTION FORM FOR INTERIM STATUS STANDARDS FOR
OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT
FACILITIES

Uniconal Inc NC D003164464 GASTON
 Name of Site EPA I.D. County

214 W Roby Ave. Gastonia NC 28059
 Location Signature of Facility Contact

Sept 1, 1981 John Robinson
 Date Signature of Inspector(s)

Carlton P. Doby Sr.

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

	<u>C</u>	<u>NC</u>	<u>NA</u>	<u>Violation(s)</u>
1. GENERAL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. GENERAL FACILITY STANDARDS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Waste Anal. Plan Part 265.13</u>
3. PREPAREDNESS AND PREVENTION	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Contingency Plan Subpart C</u>
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. GROUND-WATER MONITORING	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. CLOSURE AND POST-CLOSURE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. FINANCIAL REQUIREMENTS <u>Has statement</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. USE AND MANAGEMENT OF CONTAINERS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. TANKS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
11. SURFACE IMPOUNDMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
12. WASTE PILES <u>(should delist)</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
13. LAND TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
14. LANDFILLS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
15. INCINERATORS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
16. THERMAL TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
17. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
18. UNDERGROUND INJECTION	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

YES NO
() (✓)

Imminent hazard
 Explain _____

1) FACILITY INFORMATION

Uniroyal Chemical Co., Div. of Uniroyal, Inc.
214 W. Ruby Avenue
P. O. Box 2337
Gastonia, NC 28052
704/864-3411
EPA ID #NCD003164464

2) RESPONSIBLE INDIVIDUAL

John Robinson, Tech. Supvr.

3) SURVEY PARTICIPANTS

John Robinson, Tech. Supvr., Uniroyal, Inc.
Rick Doby, Sr., District Sanitarian
Julian Foscue, III, Regional Program Supvr.

4) DATE OF INSPECTION

September 1, 1981

5) APPLICABLE REGULATIONS

40 CFR Parts 262 and 265

- 6) PURPOSE OF SURVEY - RCRA compliance inspection was conducted at Uniroyal, Inc. by Rick Doby, District Sanitarian, and Julian Foscue, Regional Program Supvr., Solid & Hazardous Waste Management Branch. The inspection included record review, site survey and sampling procedures. Regulatory Requirements covered included those contained in 40 CFR Part 262 - Standards applicable to generators and Part 265 - Standards applicable to TSDF's under General Facilities Standards. ~~5-1-81~~

- 7) Uniroyal, Inc. occupies 8.75 acres of land on W. Ruby Avenue in Gastonia, N. C. in which the facility manufactures herbicides growth regulants, fungicides, poly-urethane pre-polymers, rubber labels and plastic drum covers. The manufacture of these products generates 16,000-25,000 lbs/year of liquid toxic wastes which are transported by and incinerated by Robuck Systems of S. C. All liquid toxic wastes are stored in closed and labeled 55-gallon drums meeting all requirements under 40CFR Part 265 Subpart I - use & mgt. of containers. Waste is pumped from the 55-gallon drums into a bulk carrier for disposal.

Uniroyal also generates approximately 145,000 lbs/year, \pm 20,000 lbs/year, of bags which were listed on the original Part A. These bags are bailed and transported & disposed by SCA, Pinewood, S. C.

Mr. Robinson stated that these bags should not have been listed and wishes to delist the waste pile and transport the bags to the county landfill upon approval by this office. The facility will address this request by mail as soon as possible.

This facility operates under the following Air Quality Permits (see attachment "A") and has an SPCC Plan. Air Emmissions are checked by DEM approximately every 6 months. The last air inspection was conducted on February 4, 1981.

Point
GASTONIA AIR PERMITS
AND EXPIRATION DATE

<u>DEPARTMENT</u>	* <u>PERMIT NO.</u>	<u>EXPIRATION DATE</u>
HERBICIDE	4404 R	April 1, 1985
MH-30	4405	April 1, 1985
POLYWET	3810-R	July APRIL 1, 1985
RUBBER LABELS	4403	April 1, 1985
VIBRATHANE	3610 R2	April 1, 1985
VITAVAX	3611 R3	April 1, 1985

*
Issued through N.C. NRCD

FORM 1
GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F N C D 0 0 3 1 6 4 4 6 4

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

NCDD003164464

UNIROYAL INC
PO BOX 2337
GASTONIA, NC 28052

214 W RUBY AVE
GASTONIA, NC 28052

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		E. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			X
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			X
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)			X
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in-situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			X
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X

III. NAME OF FACILITY

1 UNIROYAL CHEMICAL CO. DIV. OF UNIROYAL INC

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title) **B. PHONE (area code & no.)**

2 ROBINSON JOHN TECH SUPERVISOR 704 864 3411

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 P. O. BOX 2337

B. CITY OR TOWN **C. STATE** **D. ZIP CODE**

4 GASTONIA NC 28052

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 214 WEST RUBY AVENUE

B. COUNTY NAME

GASTON

C. CITY OR TOWN **D. STATE** **E. ZIP CODE** **F. COUNTY CODE (if known)**

6 GASTONIA NC 28052 NA

VII. SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
7 2 8 7 9 (specify)	AGRICULTURAL CHEMICALS	7 2 8 2 1 (specify)	PLASTIC MATERIALS
C. THIRD		D. FOURTH	
7 2 8 1 3 (specify)	SURFACE ACTIVE AGENTS	7 3 0 6 9 (specify)	FABRICATED RUBBER PRODUCTS

VIII. OPERATOR INFORMATION

A. NAME: UNIROYAL CHEMICAL CO DIV OF UNIROYAL INC

B. Is the name listed in Item VIII-A also the owner? YES NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box. If "Other" specify): P (specify)

D. PHONE (area code & no.): 203 723 3840

E. STREET OR P.O. BOX: ELM STREET

F. CITY OR TOWN: NAUGATUCK

G. STATE: CT. ZIP CODE: 06770

H. INDIAN LAND: Is the facility located on Indian lands? YES NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	B. PSD (Air Emissions from Proposed Sources)
9 N	9 P
C. UIC (Underground Injection of Fluids)	D. OTHER (specify)
9 U	(specify)
E. RCRA (Hazardous Wastes)	F. OTHER (specify)
9 R	(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE OF HERBICIDES, FORMULATION OF GROWTH REGULANT AND FUNGICIDE, MANUFACTURE OF POLY-URETHANE PRE-POLYMER, MANUFACTURE OF RUBBER LABELS AND PLASTIC DRUM COVERS.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the 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.

A. NAME & OFFICIAL TITLE (type or print) Robert J. Mazaika Dir. of Mfg. & Engineering	B. SIGNATURE	C. DATE SIGNED
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COMMENTS FOR OFFICIAL USE ONLY

C	
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FORM 3 RCRA ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
 Consolidated Permits Program
 (This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
 F N C D O O 3 1 6 L L 6 L

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS:
23	24	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date).

1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

8	YR.	MO.	DAY
19	75	08	11

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

71	YR.	MO.	DAY
72	74	75	76

B. REVISED APPLICATION (place an "X" below and complete item 1 above)

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES.—CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.

2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

13	14	15	16	17	18	19	20	21	22
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LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	3000	G		7				
2	S 0 3	150	Y		8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES FOR DESCRIBING OTHER PROCESSES (code "1"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous wastes: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page-1)														
F	N	C	D	0	0	3	1	6	4	4	6	4	T/A	C
														6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)							
	3	5	1	4	3	8		8	1	1	1	1	5
	55	59	57	54	59	51		72	74	75	76	77	79

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER						2. PHONE NO. (area code & no.)					
3. STREET OR P.O. BOX						4. CITY OR TOWN					
5. ST.						6. ZIP CODE					

IX. OWNER 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.

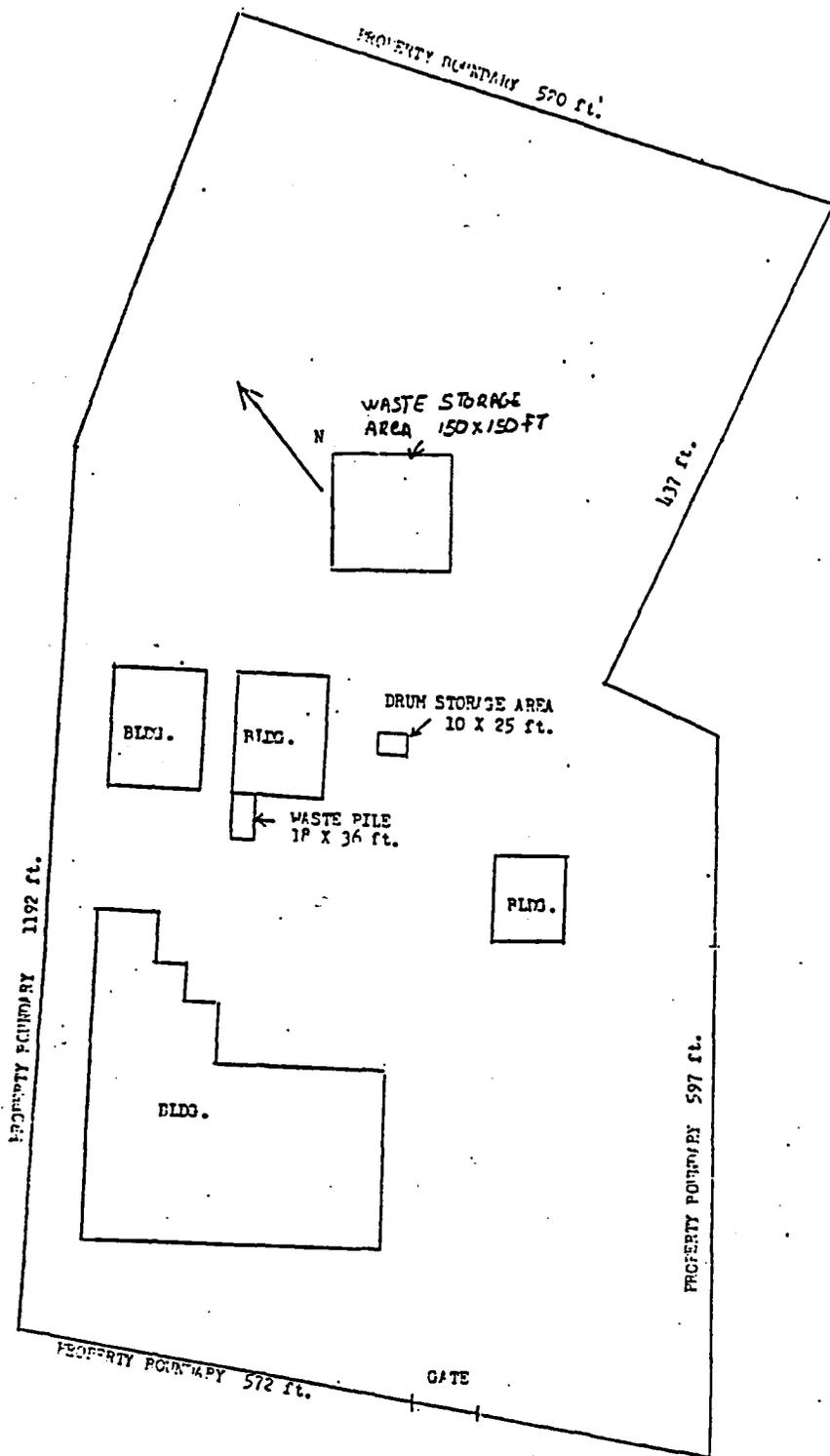
A. NAME (print or type) Robert J. Mazaika Dir. of Mfg. & Engineering	B. SIGNATURE	C. DATE SIGNED
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X. OPERATOR CERTIFICATION

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.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
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V. FACILITY DRAWING (see page 4)



SCALE 1 INCH = 158 FE.

NOTE: SEE ALSO DETAILED MAP ATTACHED