

Hazardous Waste Section
File Room Document Transmittal Sheet

17

Your Name: Spring Allen
EPA ID: N C D 0 5 7 1 7 4 6 5 8
Facility Name: Rockwell International
Document Group: Inspection/Investigation (I)
Document Type: Other (O)
Description: CEIs and documents dated between December 1, 1983 and October 8, 1993
Date of Doc: 12/1/1983
Author of Doc: various

File Room Use Only

Date Recieved by File Room:

Date Scanned:

| Month | Day | Year |
|-------|-----|------|
| 10 | 13 | 2016 |
| 10 | 13 | 2016 |

NCD057174658

Scanner's Initials: *R*

Region IV CM&E Form - Side A

EPA ID: NCD038556726

Submitted by: _____ Date: _____
Entered by: _____ Date: _____

Facility Name: Rockwell International City: Lenoir, N.C.

EVALUATION DATA: New: _____ Change: _____ Delete: _____ (: Required)

Agency: S Date: 10/08/93 Type: CEI Control Number Data Entry Personnel: _____

Person: 010 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

| Generators | |
|------------|---|
| GER | |
| GGR | E |
| GLB | |
| GEO | E |
| GMR | |
| GOR | |
| GPT | |
| GRR | |
| GSC | |

| Transporters | |
|--------------|--|
| TGR | |
| TMR | |
| TOR | |
| TRR | |
| TWD | |

| TSD's | | |
|-------|--|--|
| DCH | | |
| DCL | | |
| DCP | | |
| DFR | | |
| DGS | | |
| DGW | | |
| DIN | | |
| DLB | | |
| DLF | | |
| DLT | | |
| DMC | | |
| DMR | | |
| DOR | | |
| DOT | | |
| DPB | | |
| DPP | | |
| DSI | | |
| DTR | | |
| DTT | | |
| DWP | | |

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:
(72) 1: N.O.V # 93-364 Reinspection
2: Facility in compliance w/ regulations! No N.O.V issued!!!

VIOLATION DATA: New: _____ Change: _____ Delete: _____

#1 Agency: S Type: CEI Date (mdy): 08/24/93 Class: 2
Determined: _____
Priority: Branch: 01 Person: 010 Seq. Number (Data Entry): _____
Return to Compliance: 09/27/93 Scheduled 09/27/93 Actual
Reg. Type: SR Reg. Description (30): 40 CFR 262.34(d)(5)(ii)(A)(B)
Comment (72): Incompliance

#2 Agency: S Type: CEI Date (mdy): 08/26/93 Class: 2
Determined: _____
Priority: Branch: 01 Person: 010 Seq. Number (Data Entry): _____
Return to Compliance: 09/27/93 Scheduled 09/27/93 Actual
Reg. Type: SR Reg. Description (30): 40 CFR 262.34(d)(4) ref -> 265.34
Comment (72): Incompliance

Agency: Type: Date (mdy): / / Class:
Determined: _____
Priority: Branch: Person: Seq. Number (Data Entry): _____
Return to Compliance: / / Scheduled / / Actual
Reg. Type: Reg. Description (30): _____
Comment (72): _____

Continue violation data on Side B if necessary -

SMALL QUANTITY GENERATOR INSPECTION FORM

C = copies made; * = violation; P = photo taken

Facility Name: Rockwell International (Plastics)
Address: 601 Hibriten Dr. SW
ID #: NCD 038556726
Inspection Date: 8 Oct 1993 Last Inspection 26 Aug 1993
Contact: Dennis Arnold Type of Inspection CGI/SQG
Present at Inspection: R. Hedden, D. Arnold

Type of business: Thermoplastics
Processes:
Wastes Generated: FOO3 Paint waste

Transporters: _____ TSD's _____

Manifests:
Signed Copies? _____ Filled out correctly? _____
Treatment Standards? _____

Inspection Records: _____

Emergency Contacts:
Emergency Coordinator? _____
Info by Phones:
Emergency coordinator phone? Fire Department phone?
location of fire/spill equipment?
Personnel trained? _____

Annual Report:
Waste analysis (TCLP): _____
Accumulation Areas: Description: _____

Closed/labeled/dated/< 55 gallons?
Storage Areas: Description: form of comm. established.

Closed/labeled/dated/< 90 days/good condition?
Less than 6000 kg on site?

SIGNATURE Robin B. Hedden

FACILITY/CONTACT Dennis Arnold

DATE 8 Oct 1993

Region IV CM&E Form - Side A

EPA ID: NCDO38556726

Submitted by: _____ Date: _____
Entered by: _____ Date: _____

Facility Name: Rockwell International City: Lenoir, N.C.

EVALUATION DATA: New: Change: _____ Delete: _____ (_____ : Required)

Agency: S Date: 08/24/93 Type: CEI Control Number Data Entry Personnel: _____
Persons: 010 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators

| | |
|-----|--|
| GER | |
| GGR | |
| GLB | |
| GOQ | |
| GHR | |
| GOR | |
| GPT | |
| GRR | |
| GSC | |

Transporters

| | |
|-----|--|
| TGR | |
| TMR | |
| TOR | |
| TRR | |
| TWD | |

TSD's

| | |
|-----|--|
| DCH | |
| DCL | |
| DCP | |
| DFR | |
| DGS | |
| DGW | |
| DIN | |

| | |
|-----|--|
| DLE | |
| DLE | |
| DLT | |
| DHC | |
| DHR | |
| DOR | |
| DOT | |

| | |
|-----|--|
| DFB | |
| DPP | |
| DSI | |
| LTR | |
| BIT | |
| DWP | |

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:

(72) 1: This facility has to call Jim Edwards and change info. for one month.
2: _____

VIOLATION DATA: New: Change: _____ Delete: _____

#1 Agency: S Type: CEI Date (mdy): 08/26/93 Class: 2
Priority: Branch: 01 Person: 010 Seq. Number (Data Entry): _____
Return to Compliance: 09/27/93 Actual: _____
Reg. Type: SR Reg. Description (30): 40 CFR 262.34(d)(5)(i)(AR)

Comment (72): No emergency coord., office explosion, or location of fire extinguisher next to phone.

#2 Agency: S Type: CEL Date (mdy): 08/26/93 Class: 2
Priority: Branch: 01 Person: 010 Seq. Number (Data Entry): _____
Return to Compliance: 09/27/93 Actual: _____
Reg. Type: SR Reg. Description (30): 40 CFR 262.34(d)(4) ref. 265.34

Comment (72): Need firm of comen. in Haz Waste storage area.

Agency: Type: Date (mdy): / / Class:
Priority: Branch: Person: Seq. Number (Data Entry): _____
Return to Compliance: Scheduled: Actual:
Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

SMALL QUANTITY GENERATOR INSPECTION FORM

C = copies made; * = violation; P = photo taken

Facility Name: Rockwell International (Plastics)
Address: 1601 Hibriten Dr SW
ID #: NCD 038 55/6 726
Inspection Date: 26 Aug 1993
Last Inspection: N/A
Contact: Dennis Arnold
Type of Inspection: CET/SQG
Present at Inspection: R. Hodden, K. Masless, John Stover, Dennis Arnold, Tom Parsley

Type of business: Compression molding of thermoplastics, painting
Processes: Paint booth sludge F003
Wastes Generated: Paint waste

Transporters: Safety-Kleen (LD 981 028 002) TSD's Safety-Kleen (SD 077 995 411)
Fisher Ind. Serv. Inc. (LD 0981 020 894) Fisher Ind. Serv. Inc. (LD 981 020 894)
Safety-Kleen (LD 0251 020 105)

Manifests: Monthly July 1993 est. limit
Signed Copies? OK
Treatment Standards? OK
Filled out correctly? OK

Circle Section in Land Ban (DIE) as to whether the waste is 1. Suble Water / Non-leak Water
(6-17-93 - 7-13-93 249516) over SQG limit, OK back to 1991! Call Jim Glands (912) 243-2178
Inspection Records: Weekly records OK

Emergency Contacts:
Emergency Coordinator? Dennis Arnold

Info by Phones: Needs phone in space, no name
Emergency coordinator phone? X Fire Department phone? What is
location of fire/spill equipment? not specified on sheet.

Personnel trained? Yes, by Dennis Arnold who is trained under EPA Technology

Annual Report: Must be set up of 1990, 91, 92 reports.
Waste analysis (TCLP): OK
Accumulation Areas: Description: OK, 1-55 gal drum

Closed/labeled/dated/< 55 gallons? OK
Storage Areas: Description: Empty, OK

Closed/labeled/dated/< 90 days/good condition? OK
270
Less than 6000 kg on site? 11

SIGNATURE: [Signature]

FACILITY/CONTACT: Dennis K. Arnold

DATE: 25 Aug 1993

DEPARTMENT OF ENVIRONMENT, HEALTH, AND NATURAL RESOURCES
DIVISION OF SOLID WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

ACTIVITY REPORT

SUBJECT: ROCKWELL INTERNATIONAL (PLASTICS)

LOCATION: CALDWELL CO. DATE: 26 AUGUST 1993

ADDRESS: 601 HIBRITEN DR. S.W. TIME SPENT: 4.5 HRS.

CITY: LENOIR STATE: N.C. ZIP:

BY WHOM: ROBIN B. HEDDEN, AND KEITH MASTERS

PERSONS CONTACTED: JOHN STOVER, DENNIS ARNOLD, AND TOM PAISLEY.

REASON FOR VISIT: CEI/SQG

COPIES TO: KEITH MASTERS

REPORT: On the above day, Keith Masters and myself went to the facility to conduct a SQG/CEI. We met with the leadership, and conducted the inspection. A N.O.V. was issued to the facility for two violations. The company produced more than the allowable amount for the period ending with the 7 July 1993 shipment. They have been instructed to call Jim Edwards and register with the state as a Large Quantity for that month. No violation was noted for the overage due to the correct compliance since 1991.

ACTIVITY TYPE: CHECK MOST APPROPRIATE

- | | |
|-------------------------|------------------|
| 1. COMPLAINT | 5. PRESENTATION |
| 2. SPILL | 6. TRAINING |
| 3. TECHNICAL ASSISTANCE | 7. OTHER X (CEI) |
| 4. MEETING | |

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary



September 14, 1993

ROCKWELL INTERNATIONAL
PO BOX 820
LENOIR NC 28645

RE: EPA ID No.: NCD038556726

Dear Sir:

Based on information received by this office for the site identified with the above EPA ID number, the State has accepted and processed the change in RCRA classification or information for the above listed site.

Your EPA ID number is active.

Current computer record of your facility contains following information:

(X Indicates Operational Status of Your Facility)

- | | |
|-------------------|-------------------------|
| - LARGE GENERATOR | X SMALL QNTY. GENERATOR |
| - TRANSPORTER | - TREATER |
| - STORER | - DISPOSER |

Company Name: ROCKWELL INTERNATIONAL
Owner: ROCKWELL INTERNATIONAL CORP.
Owner Address: PO BOX 820
City, St.& ZIP: LENOIR NC 28645
Contact: ARNOLD DENNIS
Phone Number: (704)754-8441
Location Addr.: 601 HIBRITEN DRIVE SW
City, St.& ZIP: LENOIR NC 28645

Please verify the above computer information. Please notify us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status, namely Company's Name, Ownership, Address, Contact, or Telephone.

Your EPA ID number is currently active.

Sincerely,

R.J. Edwards, Administrative Officer

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone 919-733-4990 FAX 919-733-4810

An Equal Opportunity Affirmative Action Employer

50% recycled/ 10% post-consumer paper

CC: ROBIN PURCELL



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

William L. Meyer
 Director

June 25, 1992

ROCKWELL INTERNATIONAL CORP.
 1000 ROCKWELL DRIVE
 FLETCHER NC 28732

RE: EPA ID No.: NCD057174658

Dear Sir:

Based on information received by this office for the site identified with the above EPA ID number, the State has accepted and processed the change in RCRA classification or information for the above listed site.

Your EPA ID number is active.

Current computer record of your facility contains following information:

(X Indicates Operational Status of Your Facility)

- | | |
|-------------------|-------------------------|
| - LARGE GENERATOR | X SMALL QNTY. GENERATOR |
| - TRANSPORTER | - TREATER |
| - STORER | - DISPOSER |

| | |
|-----------------|------------------------------|
| Company Name: | ROCKWELL INTERNATIONAL CORP. |
| Owner: | ROCKWELL INTERNATIONAL CORP. |
| Owner Address: | 2201 SEAL BEACH BOULEVARD |
| City, St.& ZIP: | SEAL BEACH CA 90740 |
| Contact: | FRAZIER JOHN |
| Phone Number: | (704)687-2145 |
| Location Addr.: | 1000 ROCKWELL DRIVE |
| City, St.& ZIP: | FLETCHER NC 28732 |

Please verify the above computer information. Please notify us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status, namely Company's Name, Ownership, Address, Contact, or Telephone.

Your EPA ID number is currently active.

Sincerely,

R.J. Edwards, Administrative Officer
 Division of Solid Waste Management

CC: SPRING ALLEN

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

JUN 18 1992

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

| | | | | | | | | | | | | | |
|---|---|---------------------------------|---|---|---|---|---|---|---|---|---|---|---|
| <input checked="" type="checkbox"/> A. First Notification | <input type="checkbox"/> B. Subsequent Notification (complete item C) | C. Installation's EPA ID Number | | | | | | | | | | | |
| | | N | C | D | O | 5 | 7 | 1 | 7 | 4 | 6 | 5 | 8 |

II. Name of Installation (Include company and specific site name)

| | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| R | O | C | K | W | E | L | I | N | T | E | R | N | A | T | I | O | N | A | L | C | O | R | P |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 0 | 0 | 0 | R | O | C | K | W | E | L | D | R | I | V | E |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

Street (continued)

| | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|

| | | | | | | | | | | | | | | | | | | | | | |
|--------------|---|---|---|---|---|---|---|--|--|-------|---|----------|---|---|---|---|---|---|---|---|---|
| City or Town | | | | | | | | | | State | | ZIP Code | | | | | | | | | |
| F | L | E | T | C | H | E | R | | | N | C | 2 | 8 | 7 | 3 | 2 | - | 9 | 4 | 9 | 4 |

| | | | | | | | | | | | | | | | | | | | | | |
|-------------|---|-------------|---|---|---|---|---|---|---|---|--|--|--|--|--|--|--|--|--|--|--|
| County Code | | County Name | | | | | | | | | | | | | | | | | | | |
| 0 | 9 | H | E | N | D | E | R | S | O | N | | | | | | | | | | | |

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 0 | 0 | 0 | R | O | C | K | W | E | L | D | R | I | V | E |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| | | | | | | | | | | | | | | | | | | | | | |
|--------------|---|---|---|---|---|---|---|--|--|-------|---|----------|---|---|---|---|---|---|---|---|---|
| City or Town | | | | | | | | | | State | | ZIP Code | | | | | | | | | |
| F | L | E | T | C | H | E | R | | | N | C | 2 | 8 | 7 | 3 | 2 | - | 9 | 4 | 9 | 4 |

V. Installation Contact (Person to be contacted regarding waste activities at site)

| | | | | | | | | | | | | | | | | | | | | | | |
|-------------|---|---|---|---|---|---|---|---|--|--------------|---|---|---|--|--|--|--|--|--|--|--|--|
| Name (last) | | | | | | | | | | Name (first) | | | | | | | | | | | | |
| F | R | A | Z | I | E | R | J | R | | J | O | H | N | | | | | | | | | |

| | | | | | | | | | | | | | | | | | | | | | | | |
|-----------|---|---|---|---|---|---|---|---|---|-------------------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Job Title | | | | | | | | | | Phone Number (area code and number) | | | | | | | | | | | | | |
| F | A | C | I | L | I | T | Y | E | N | G | R | 7 | 0 | 4 | - | 6 | 8 | 7 | - | 2 | 1 | 4 | 5 |

VI. Installation Contact Address (See Instructions)

| | | | | | | | | | | | |
|-------------------------------------|--------------------------|-----------------------------------|--|--|--|--|--|--|--|--|--|
| A. Contact Address Location | | B. Street or P.O. Box | | | | | | | | | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1 0 0 0 R O C K W E L L D R I V E | | | | | | | | | |

| | | | | | | | | | | | | | | | | | | | | | |
|--------------|---|---|---|---|---|---|---|--|--|-------|---|----------|---|---|---|---|---|---|---|---|---|
| City or Town | | | | | | | | | | State | | ZIP Code | | | | | | | | | |
| F | L | E | T | C | H | E | R | | | N | C | 2 | 8 | 7 | 3 | 2 | - | 9 | 4 | 9 | 4 |

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

| | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| R | O | C | K | W | E | L | I | N | T | E | R | N | A | T | I | O | N | A | L | C | O | R | P |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

Street, P.O. Box, or Route Number

| | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2 | 2 | 0 | 1 | S | E | A | L | B | E | A | C | H | B | O | U | L | E | V | A | R | D |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| | | | | | | | | | | | | | | | | | | | | | |
|--------------|---|---|---|---|---|---|---|---|--|-------|---|----------|---|---|---|---|---|---|---|---|---|
| City or Town | | | | | | | | | | State | | ZIP Code | | | | | | | | | |
| S | E | A | L | B | E | A | C | H | | C | A | 9 | 0 | 7 | 4 | 0 | - | 8 | 2 | 5 | 0 |

| | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------|---|---|---|---|---|---|---|---|---|--------------|---|--------------------------|--------------------------|------------------------------|--|----------------|--|--|--|--|--|
| Phone Number (area code and number) | | | | | | | | | | B. Land Type | | C. Owner Type | | D. Change of Owner Indicator | | (Date Changed) | | | | | |
| 3 | 1 | 0 | - | 7 | 9 | 7 | - | 3 | 3 | 1 | 1 | <input type="checkbox"/> | <input type="checkbox"/> | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | | | | | | |

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RCRA INSPECTION REPORT

1) Facility Information

Rockwell International Corp
1000 Rockwell Drive
Fletcher NC
NCD 057 174 658

2) Facility Contact

John Frazier

3) Survey Participants

Doug Judkins

Spry Allen

4) Date of Inspection

June 22, 1992

6) Purpose of Survey

To determine compliance with 40CFR 262, 265, & 268. Generator standards.

7) Facility Description

* Rockwell International is a manufacturer of truck axles. RI requested a change of status 6/15/92. to become a Small Quantity Generator, and has chosen to continue training annually, and to keep updates of the contingency plan (combined w/ SPCC Plan) NCDEHNR - Received an update to the Contingency Plan dated 4/9/92.

Hazardous wastes generated are F003/Pool waste Xylene which is manifested for off site fuel blending to Landlaw Environmental Services NCD 000648451 by Landlaw MDD 980554653. RI has manifested 2 shipments of ^{DH324} F003/Pool Hwaste off site since the last inspection 8/6/91 and shipped a total of 981 p. Hw in 1991. Facility is generally less than 2200 lbs. Hwaste per month therefore should become an SQG as requested.

8) Waste Minimization

Facility has replaced xapha with a non regulated degreaser. Stopped use of 111 tric. in 1988/89, decreased generation considerably. to change to SFG, 1991 HW generation < 1000 lbs.

9) Site Deficiencies

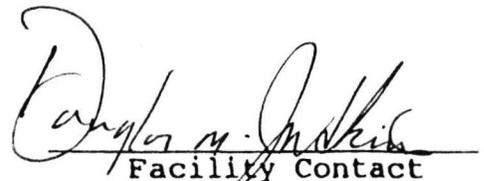
none noted.

10) Recommendations

none noted.

11) Signed


Inspector/Reviewer
June 22, 1992
Date


Facility Contact

RCRA INSPECTION FIELD NOTES

C = copies made; * = violation; P = photos

Facility name: Rockwell International
 Address: 1000 Rockwell Drive
 ID number: NC17057174658
 Date: 6-22-92 Last inspection: 8/6/91
 Type of inspection: COI
 Contact: John Frazier
 Present at inspection: Doug Judkins
 Waste Generated: F003 / P001 waste Xylene

John
Doug

Transporters: Land Law Env. TSD's Services
MDD 980 554 653 NC1000648 451

Manifests: 475 P + 481 = 956 P in 2
shipments since last insp.

Signed copies:
 Treatment Standards:
 Inspection Records: weekly / record shows quick response
to problems identified.
 Contingency Plan: _____

- actions for spill/fire:
- agreements with emergency management:
- name, address, phone for em coords:
- emergency equip/location/alarms:
- evacuation plan/signals/primary/secondary:
- em coords updated?
- reports on use of conting plan?

Training Records: Al Lindsey 5/20/91 / Brian Riggs 5/21/91
JW McDade 5/20 51 emp. trained.

Last training: 7-11-91 3-92 requested stat change
 Job Title: _____
 Job description: 6/15/92 certified
 Content: _____
 Sign-off: _____
 em coords and appropriate personnel trained?

Annual Report: Sent cert mail 1-7-92 981P/1991 generated.
 Waste Analysis: note EPTx for metals. ok & knowledge

Accumulation areas: _____
1 Satt. Xylene closed
by 2ndary containment pen

Storage Area: _____
1 DM xylene 6-17-92

Notes: Request change of status 6/15/92
has not received verification of change from
Raleigh to date

Safety/Security Insp.
 product feed
 Main Storage Area

Al Lindsey Maint Super. 5/20/91
Brian Biggo " 5/21/91

JW McDade Maint Tech 5/20/91
Loren Brown " 5/20/91

Austin Watts " 5/20/91

George Pressley " 5/20/91

Roy Robinson " "

James Hills " "

Carl Maybin " "

Harry Moore " "

JD Edwards " "

Bob Maybin " "

William Whitworth " "

James Smoke

Chuck Thompson

Frank Purrer

Dean Bair

Robin Lawing

Keville Turner

Tom Mc Mahan

Keith Howell

Sam Laws

Ed Matjka

Norman Wilson

Jerry Wilson

Jack Conard

John Caldwell

Joseph Mendelsohn

Stewart Justice 5/21

George Foster "

Roger Wright

Joe Hyatt

Jim Sylvester

John Sellers

Joe Baboosi

Ray Byrd

Dale Alan 5/20

Jonny Tang 5/21

On-Highway Products
Rockwell International Corporation
1000 Rockwell Drive
Fletcher, NC 28732



Received
4-27-92
[Signature]

April 9, 1992

Mr. Donald Keith Masters
North Carolina Department of Environment, Health and Natural Resources
Hazardous Waste Section
59 Woodfin Place
Asheville, NC 28801

Dear Mr. Masters

Enclosed is the latest revision to our combined Spill Prevention Control and Countermeasure and Hazardous Waste Management Facility Contingency Plan.

This reprinting will replace the Appendix, Item 3, Evacuation Plan in your current copy that you have on file. Please return this letter with your signature and date of receipt in the self-addressed stamped envelope provided.

Rockwell would like to thank you for your assistance and continued support should your services be required to respond appropriately to the plan.

ROCKWELL INTERNATIONAL

[Handwritten Signature]
JOHN R. FRAZIER JR
Facility Engineer

JF:lc

Enclosure

I have received the revision to Rockwell International Corporation's Spill Prevention Control and Countermeasure and Hazardous Waste Management Facility Contingency Plan.

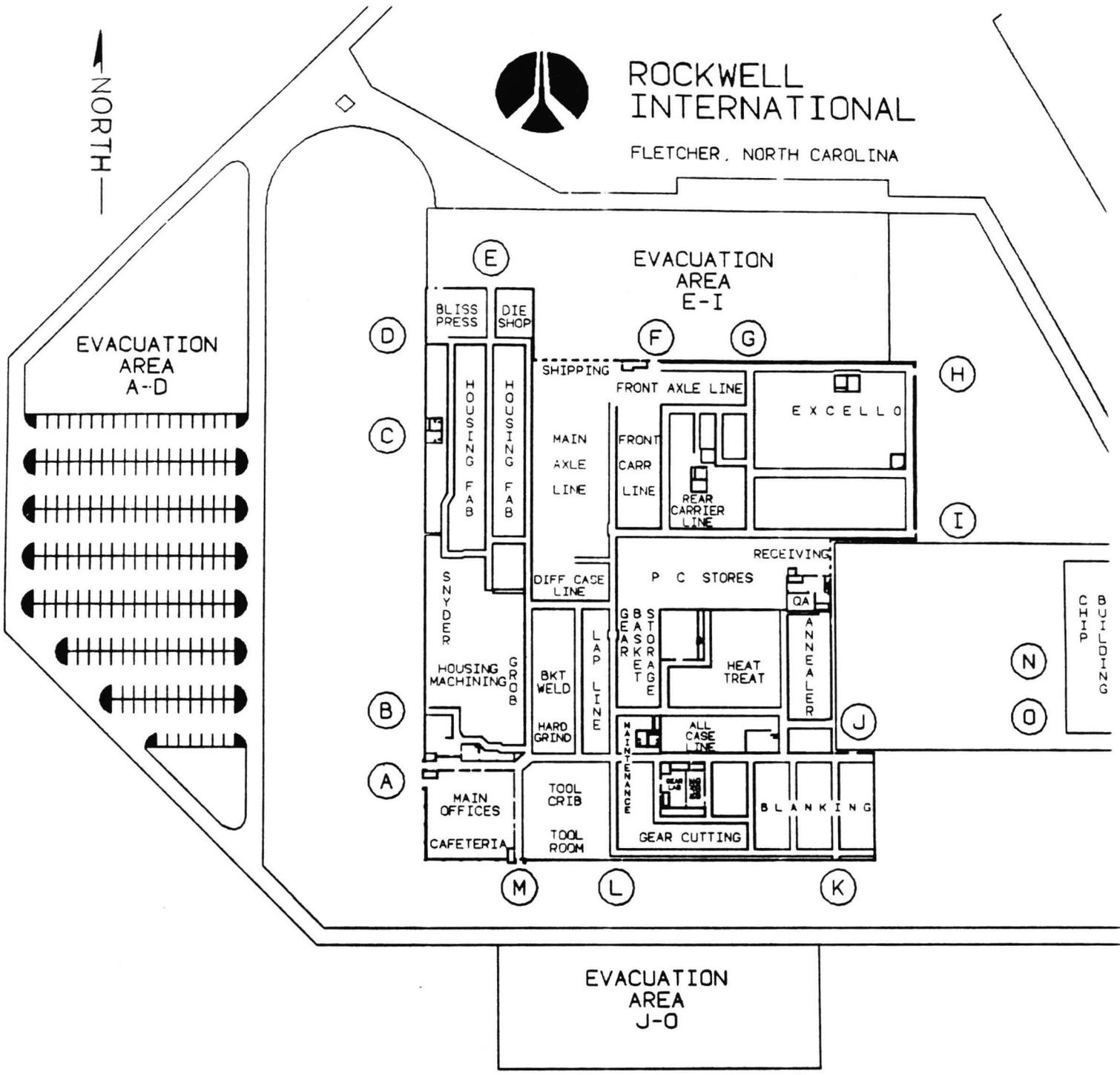
Signature:

Date:

NORTH



ROCKWELL INTERNATIONAL
FLETCHER, NORTH CAROLINA



EVACUATION ROUTE MAP

DEPARTMENT OF ENVIRONMENT, HEALTH & NATURAL RESOURCES
HAZARDOUS WASTE SECTION

MEMO TO THE FILE:

From: R. Russell

Date: 6-9-92

RE: Rockwell International

John Frasin - Rockwell Int. - Henderson County
(704) 687-2145 requested a "Change in
Status Form" to change company from Large
Quantity generator to Small Quantity. Forms
were sent 6-9-92.

RAR

copy to: Giles/S. Allen

DEPARTMENT OF ENVIRONMENT, HEALTH & NATURAL RESOURCES
HAZARDOUS WASTE SECTION

MEMO TO THE FILE:

From: R. Russell

Date: 6-9-92

RE: Rockwell International

John Frasin - Rockwell Int. - Henderson County
(704) 687-2145 requested a "Change in
Status Form" to change company from Large
Quantity generator to Small Quantity. Forms
were sent 6-9-92.

RHR

copy to: Giles/S. Allen

RCRA INSPECTION REPORT

1) Facility Information

Rockwell International
1000 Rockwell Dr
Fletcher
NC 287174658

2) Facility Contact

John Fraser

3) Survey Participants

John Fraser
Robert Kase

4) Date of Inspection

8-6-91

5) Purpose of Survey

To determine compliance with NC Hazardous Waste Management Rules. Specifically 40 CFR 262, 265 & 268

6) Facility Description

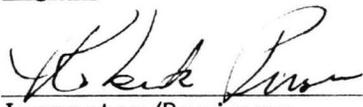
This facility manufactures truck axles. Hazardous waste generated are: Waste Xylene from paint area F003/D001. Transport and TSD used is Laidlaw. One satellite accumulation area is operated at the paint area. Waste is stored in a fenced, diked outdoor area on pallets. One 55 gallon drum was in storage area and one 55 gallon drum in satellite area. 1878 lbs of hazardous waste was generated in 1990. Facility is considering becoming classified as a SQG.

7) Waste Minimization - Facility has reduced volume of waste generated to 1878 lbs in 1990 and is considering reclassifying as a SQS

8) Site Deficiencies
none noted

9) Recommendations none noted

Signed



Inspector/Reviewer

8-6-91
Date



Facility Contact

State of North Carolina
 Department of Environment, Health, and Natural Resources
 Division of Solid Waste Management
 Hazardous Waste Section

SITE SAFETY PLAN (SSP)

I. PRE-ACTIVITY SECTION

(A) Facility name: Rockwell International EPA ID# NCD
 Address: 1000 Rockwell Drive Fletcher Phone# 704 687 2000
 Contact: John Frazer Phone# 704 687 2145
 SSP Prepared By: Roberta Purcell Date(s) 7-26-90

| (B) Site Visit * | Inspection Type | Checklist ** | On-Site Safety* |
|------------------|------------------|------------------|-----------------|
| Date(s) | (CME, RFA, ETC.) | Modified date(s) | Designee |
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |

- * Date(s) before/during field activity.
- ** Place a double asterisk (**) and date(s) after all modified information, or attach extra page(s).
- *** **IMPORTANT** all activities conducted at RCRA facilities/sites shall require the consent of on-site Safety Designee/Contact.

(C) SITE TOPOGRAPHY: Mountains ___ Rivers ___ Valley ___ Level
 Slopes ___ Urban ___ Facility ___ Others Industrial

Special Access Requirements: Sign in at front Security

(D) EMERGENCY INFORMATION

Ambulance: Henderson Co. Telephone# 911
 Hospital: Memorial Mission Telephone# 704 255-4000
 Police: Henderson Co. Sheriff Telephone# 911
 Fire Department Fletcher Telephone# 911
 Fire and Emergency Signals reviewed _____
 Site Evacuation plan reviewed _____

E) INFORMATION SOURCES

Part B: _____ State: _____ * Contingency Plan: _____

Part A: _____ RFA/I: _____ Closure Plan: _____

*Facility Safety Plan _____ Other: _____

*Request copy of Facility Safety/Contingency Plan for reference.

copy on file

(F) PERMITS

Hazardous Waste: *N/A* _____ Status: _____

Water: _____ Air: _____ Other: _____

Summary of Regulated Units and SWMUS:

(Indicate number of units)

Landfills: _____ Incinerators: _____ Storage areas: _____

Surface: _____ Tank farms: _____ Other: _____

Waste Piles: _____ Other Treatment: _____ SWMUS: _____

(G) FACILITY PROCESS DESCRIPTION

Briefly describe the facility production process:

(H) HEALTH AND SAFETY CONSIDERATIONS

Briefly identify hazard type/potential; describe on last page of section

(I) if necessary:

| <u>Area of Concern</u> | <u>Hazard Potential (1)</u> |
|--|-----------------------------|
| Fire and Explosion | _____ |
| Oxygen Deficiency (e.g. confined spaces) | _____ |
| Ionizing Radiation | _____ |
| Biological | _____ |

Area of Concern

Hazard Potential (1)

Safety (e.g. falls, slips, trips)

Electrical

Noise

Heat or Cold Stress

Chemical Exposure (2)

note 1: Subjective evaluation (e.g., minimum, moderate, high, unknown or not applicable) refer to table (1) of categories and potential risks.

note 2: It is very important that you list all suspected chemical(s) and pathway(s) with sources involved (e.g. using methylene chloride in a degreasing and cleaning process or cyanide salts used in a electroplating process). When referencing sources, it is important that you describe the industrial process within the proximity of your activities (e.g. open vats, confined space, spray booth, etc.) within the facility and/or compound.

(I) Previous Releases, Accidents or Complaints:

Corrected
(yes/no)

Air, Soil, or Surface Water _____

Industrial Accidents _____

Complaints _____

(J) Air/Environmental Monitoring Program.

Air Monitoring Type
(yes/no)

Conducted by

Areas/tasks where needed

Toxic _____

Facility _____

Contractor _____

Other _____

Explosive/ _____
oxygen

Facility _____

Contractor _____

Other _____

Radiation _____

Facility _____

Contractor _____

Other _____

None _____

(if none explain)

Rockwell

8-6-91

Training - last date ~~was~~ 18, 91 (H.W. Hadler)
all plant personnel trained - 5-20-91

IT - } ok
ID - }
(cont. -)

Contingency Plan - OK
indicate 1^o & 2^o Emerg

Manifests -

T/ GSX - Laidlaw - MD D980554653

(TD) Laidlaw - NC 0000648451

FOOS/2001 - Xylene

- Two shipments since last inspt (5-28-90)

Annual Report - 1,878 lbs generated

Based on actual wt. including drum wt.

Inspection Log - 

RCRA INSPECTION REPORT

1) Facility Information

2) Facility Contact

3) Survey Participants

4) Date of Inspection

6) Purpose of Survey

7) Facility Description

DOCKET #

INSPECTION AND EVALUATION REPORT

EPA ID: # NC057174658 FACILITY NAME: Rockwell International

ADDRESS: 1000 Rockwell Dr CITY: Fletcher

NEW: UPDATE: DATE OF INITIAL EVALUATION: _____ STAFF ID: 63

RESPONSIBLE AGENCY S S = STATE E = EPA X = OVERSITE O OTHER

TYPE OF EVALUATION COVERED BY THIS REPORT: ENTER ONE

| | |
|----------------------------------|----------------------|
| 1= COMPLIANCE EVAL. INSP. (CEI) | 7= PART B CALL - IN |
| 2= SAMPLING INSPECTION | 8= WITHDRAWAL CAND. |
| 3= RECORD REVIEW | 9= CLOSED FACILITY |
| 4= COMP. GWM EVAL. (CME) | 10= GENERAL |
| 5= COMPLIANCE SCHED. (FOLLOW UP) | 11= CASE DEVELOPMENT |
| 6= CITIZEN COMPLAINT | 80= INFORMAL MEETING |

DATE OF EVALUATION COVERED BY THIS REPORT: 5-29-90

| CLASS OF VIOLATION | | | | VIOLATIONS/RELEASES | | | | | |
|--------------------|-----|------|-----|---------------------|-----------|-------|----|----|----|
| CLASS | GWM | C/CP | FIN | PT.B | CMPL. SCH | MNFST | LB | OT | WM |
| I | | | | | | 0 | 0 | 0 | 0 |
| II | | | | | | 0 | 0 | 0 | 0 |
| ACCEPTABLE CODES | | | | | | | | | |
| X | S | X | S | X | S | X | S | X | S |
| Z | O | Z | O | Z | O | Z | O | Z | O |
| H | | H | | I* B* | H | C B | H | H | |
| | | | H | | H | | | | |

KEY
 X = VIOLATIONS 0 = NO VIOLATION Z = PENDING
 B = VIOL. & SPECIALITY; S = SAME VIOL./SPEC.
 SPECIALTIES I = NO INSURANCE ONLY; C = CA SCHED. VIOL.
 H = HPV VIOLATIONS PRESENT; * CLASS I ONLY

ENFORCEMENT ACTIONS: (AREA OF VIOL./RISE.=GW, CP, PR, PB, CS, MA, OT, LB, OR AA)

| CLASS | AREA OF VIOL. | TYPE CODE | DATE ACTION TAKEN | COMPLIANCE DATES | | PENALTY ASSES. COLL. | RESP AG. |
|-------|---------------|-----------|-------------------|------------------|--------|----------------------|----------|
| | | | | SCHED. | ACTUAL | | |
| | | | | | | | |

CODES FOR TYPES OF ENFORCEMENT ACTIONS:

| | |
|-------------------------|----------------------------|
| 03 = WARNING LETTER/NOV | 11 = FILED CIVIL ACTION |
| 04 = ADMIN. COMPLAINT | 12 = FILED CRIMINAL ACTION |
| 05 = FINAL ADMIN. ORDER | 13 = CIVIL REFERRAL TO AG |
| 10 = INFORMAL | 90 = HEARING |

COMMENTS: _____

RCRA INSPECTION REPORT

1) Facility Information

Rockwell International
1000 Rockwell Dr. Fletcher
Henderson County
NC 28734-658

2) Facility Contact

John Frasier

3) Survey Participants

Roberta Purcell
John Frasier

4) Date of Inspection

5-29-90

6) Purpose of Survey to determine compliance with 40 CFR 262 and the applicable sections of 40 CFR 265 and 40 CFR 268.

7) Facility Description This facility manufactures truck axles. Hazardous wastes generated are: (F003) - waste glycol. Transporter/TSD facility: GSX. One satellite accumulation area is operated at the painting area and ~~some~~ wastes are stored & held in a diked, outside, fenced storage area.

The facility has shipped 2078 lbs of haz. waste since 8-9-89 and is considering changing to SQ6 status due to waste min. efforts.

8) Waste Minimization - considering changing to SQC status

9) Site Deficiencies none noted

10) Recommendations

11) Signed

Robert H. Russell
Inspector/Reviewer

5-29-90
Date

[Signature]
Facility Contact
5/29/90

GENERAL INFORMATION

FACILITY NAME: ROCKWELL INTERNATIONAL CORPORATION CONTACT: JOHN R. FRAZIER JR.

DIRECTIONS TO FACILITY: (Attach map if possible)

EXIT 13 ON INTERSTATE 26, DRIVE TOWARDS FLETCHER, NORTH CAROLINA ON HIGHWAY 25 (APPROXIMATELY 1.5 MILES) LOOKING ON THE LEFT FOR A ROCKWELL INTERNATIONAL SIGN (IMMEDIATELY AFTER CROSSING RAILROAD TRACKS). TRAVEL ON THREE LANE ROAD TO ROCKWELL SECURITY OFFICE. SPECIAL ACCESS REQUIREMENTS: CHECK IN WITH ROCKWELL SECURITY.

EMERGENCY INFORMATION

AMBULANCE: EMS TELEPHONE: 911
HOSPITAL: PARKRIDGE HOSPITAL TELEPHONE: 911
POLICE: HENDERSON COUNTY SHERIFF TELEPHONE: 911
FIRE DEPARTMENT: FLETCHER VOLUNTEER FIRE DEPARTMENT TELEPHONE: 911
SITE FIRE EVACUATION SIGNALS: PLANTWIDE ANNUNCIATOR SYSTEM

INFORMATION SOURCES

PART B: STATE: CONTINGENCY PLAN: YES
SD: RFA: CLOSURE PLAN:
SWMU QUESTIONNAIRE: PART A: OTHER:

PERMITS

HAZARDOUS WASTE: YES STATUS: GENERATOR
WATER: YES AIR: YES OTHER: NPDES

SUMMARY OF REGULATED UNITS AND SWMUS: (Indicate number of units)

LANDFILLS: INCINERATORS: STORAGE AREAS: GENERATOR STORAGE
WASTE PILES: OTHER TREATMENT: OTHER:
SURFACE IMPROVEMENTS: TANK FARMS: SWMUS:

FACILITY PROCESS DESCRIPTION:

MANUFACTURE TANDEM TRUCK AXLES

PREVIOUS RELEASES/ACCIDENTS OR COMPLAINTS:

(Corrected? YES/NO)

AIR _____ NONE _____

SOIL _____ NONE _____

SURFACE WATER _____ NONE _____

INDUSTRIAL ACCIDENTS USUAL INDUSTRIAL INJURIES ONGOING

COMPLAINTS _____ NONE _____

HEALTH AND SAFETY HAZARDS

Briefly indicate hazard type. Attach additional pages if necessary.

EXPLOSION/OXYGEN DEFICIENCY HAZARDS:
 METHANOL AND PROPANE TANK STORAGE
 AMMONIA CYLINDER STORAGE
 RADIATION HAZARDS:

NONE (Circle if applicable)

NONE (Circle if applicable)

TOXIC HAZARDS:
 AMMONIA CYLINDER STORAGE

NONE (Circle if applicable)

Briefly summarize chemicals handled on site; Add attachment if necessary.
 Indicate if these exist in a controlled state. Refer to Part A Application if list is extensive.

UNUSUAL PHYSICAL HAZARDS:

NONE (Circle if applicable)

UNUSUAL BIOLOGICAL HAZARDS:

NONE (Circle if applicable)

CHECK IF PROBLEM EXPECTED: NOISE _____ HEAT STRESS _____ COLD STRESS _____

OVERALL HAZARD RATING: (CIRCLE ONE)

VERY HIGH
 (LEVEL A)
 (ASSISTANCE NECESSARY)

HIGH
 (LEVEL B)
 (ASSISTANCE NECESSARY)

MEDIUM
 (LEVEL C)
 (MONITORING REQUIRED)

LOW
 (LEVEL D)

PERSONAL PROTECTIVE EQUIPMENT

(List equipment needed in addition to safety glasses, hard hat, and steel toed boots)

NORMAL SAFETY EQUIPMENT REQUIRED FOR PLANT
ACTIVITY IS SAFETY GLASSES AND STEEL TOED SHOES

Check
if
Needed

Needed throughout entire facility?
(If no, list area(s) or task(s) where needed.)

HEAD AND EYE:

FACE SHIELD _____
GOGGLES _____
NOISE PROTECTION _____
OTHER _____

RESPIRATORY:

TYPE

APR _____
APR CARTRIDGE _____
ESCAPE MASK _____
OTHER _____

CLOTHING:

TYVEK COVERALL _____
SARANEX COVERALL _____
COTTON COVERALL _____
SPLASH SUIT _____
OVERBOOTS _____
RAIN GEAR _____
OTHER _____

MISCELLANEOUS:

LEVEL A OR B NEEDED?

Contractor or ESD?

Areas/tasks where needed

LEVEL A _____
LEVEL B _____

AIR MONITORING TYPE

Conducted by:

Areas/tasks where needed

TOXIC _____
EXPLOSIVE/OXYGEN _____
RADIATION _____
NONE _____

FACILITY _____
ESD _____
CONTRACTOR _____
OTHER _____

GENERATOR INSPECTION FORM - PART 262

Rockwell International Corp. NC0057174658 Henderson
 Name of Site EPA I.D. County
1000 Rockwell Dr., Fletcher, N.C. 8/9/89
 Location Inspection Date

 Compliance Date Signature of Inspector(s)

 Signature of Facility Contact

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) *See Comment*
 - Subpart C waste (c)(1)(2) *#1*
- 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)

Rockwell International
8/9/89

15. C 268.7(a)(1)

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:

(1) Both Coater has been shipped to CSX
Hydrotek as non. haz. - Advise to treat each
shipment or handle as hazardous.

Facility is generating very small quantity of
waste at this time.

* This facility has greatly reduced its volume
of waste generated.

CONTAINER/TANK INSPECTION FORM - PART 265

Rockwell International Corp. NCD057174658 8/9/89
 Name of Site EPA I.D. Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
4. Inspections (265.174)
 - weekly (minimum)
5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

SUBPART J - TANKS

1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
4. Closure (265.197)
 - plan on-site
5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: _____

GENERATOR INSPECTION FORM - PART 262

Rockwell International Corp NC0057174658 Henderson
 Name of Site EPA I.D. County
1000 Rockwell Dr, Pletcher, N.C. 6-17-88 [Signature]
 Location Inspection Date Signature of Inspector(s)
[Signature]
 Compliance Date Signature of Facility Contact

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) *See Note on Pg. 2*
 - 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)

15. ^C — 268.7 (2)(1)

13. Annual Reporting (262.41)

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

14. Exception Reporting (262.42)

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

REMARKS:

Paint residue must be tested for organics before it is handled as non-hazardous - ASAP - No violation at this time!

CONTAINER/TANK INSPECTION FORM - PART 265

Rockwell International Corp. NO 057174628

6-18-88

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

- 1. General Operating Requirements (265.192)
 - NA* compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: *E*

Keith FMT Dony

GSX

GSX Hydrotech Systems, Inc.
3300 New Campus Road
Chattanooga, Tennessee 37419
(615) 821-0820

6
NCDOS 7174658
Rockwell Int.
RECEIVED
001 101908

Date: 9/26/88

Memo To: JERRY CORRELL
DALE FENTRESS

From: DAVID DESHA

Subject: OFF-SPEC/NON-CONFORMING WASTE SHIPMENT

1. Customer Name: ROCKWELL INTERNATIONAL
2. Customer Address: FLETCHER, N.C. 28732
1000 Rockwell Dr
3. Date of Shipment: 9/22/88
4. Date and time of Off-Spec/Non-Conformance Verification: 9/26; 3:40 P.M.
5. Date & Time of Customer Notification: 9:26 @ 4:15PM John Frazier
6. Regulatory Notification:
Date & Time: 9-27 @ 4:00pm / 9-28 @ 9:30AM
By: Dale Fentress / Dale Fentress
Agency & Person Notified: TDHE-J. Childress / N.C. Gary Babb
7. Manifest #: 18535
8. Profile #: 1578
8. Waste Volume: 1-55 GAL Method of Shipment: DRUM
9. Off-Spec/Non-Conforming Characteristics:
FLASH POINT: 115°F, PROFILED: NO. FLASH > 7150°F
10. Final Disposition:
Date: 9/6/88
Facility: Transporte - GSX Services
Destination - GSX Greenbar
11. Attachments: _____

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:

#1 As per specific on the procedure and spill cleanup in the Contingency Plan - No Violation at this point.

#2 Hazardous Waste and "oil" Spill Contingency Plan are combined.

CONTAINER/TANK INSPECTION FORM - PART 265

Rockwell International Corp. NCD 057174658

7-21-87

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition Of Containers (265.171)

- leakage
- past leakage (evidence)
- severe rusting
- structural defect

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance (leakage, corrosion)

3. Management of Containers (265.173)

- closed (a)
- improper handling or storage (b)

4. Inspections (265.174)

- weekly (minimum)

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
- unwashed container (b)
- separation (c)

1. General Operating Requirements (265.192)

- compatibility (a)(b)
- uncovered tank precautions (c)
- overflow prevention (d)

2. Waste Analysis and Trial Tests (265.193)*

- *Section not applicable to a generator only
- waste analysis/trial test

3. Inspections (265.194)

- discharge control equipment (a)(1)
- monitoring equipment (a)(2)
- waste level (a)(3)
- construction material (a)(4)
- surrounding area (a)(5)
- assessment schedule/procedures (b)

4. Closure (265.197)

- plan on-site

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

- properly stored (a)(1)(2)(3)
- buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.199)

- properly stored (a)
- tank washed (b)

REMARKS:



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

January 22, 1988

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

Rockwell International Corp.
1000 Rockwell Dr.
Fletcher NC 28732

RE: EPA ID No.: NCD057174658

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change RCRA listing or information that you requested.

Listed below is site information contained on our computer files:

| | |
|-------------------|-------------------------------------|
| COMPANY NAME | <u>Rockwell International Corp.</u> |
| OWNERSHIP | <u>Rockwell International Corp.</u> |
| CONTACT | <u>Frazier, John</u> |
| PHONE NUMBER | <u>(704)687-2145</u> |
| LOCATION ADDRESS | <u>1000 Rockwell Dr.</u> |
| CITY, STATE & ZIP | <u>Fletcher NC 28732</u> |

Please verify that the above computer listing/information is correct by notifying us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number has not been inactivated.

Sincerely,

A handwritten signature in cursive script that reads "R. J. Edwards".

R. J. Edwards, Compliance Officer
Solid & Hazardous Waste Management Branch

CC: KEITH MASTERS
EPA Region IV
Henderson County Health Department

General Information

1. Name and location of facility:
Name: Rockwell International Corporation
On-Highway Products Division
Location: 1000 Rockwell Drive
Fletcher, NC 28732
2. Name, address and phone number of owner:
Name: Rockwell International Corporation
Address: 600 Grant Street
Pittsburgh, PA. 15219
Phone: (412) 565-2000
3. Name and telephone number of person in charge of facility:
Name and Title: Richard Martello, Plant Manager
Phone: (704) 687-2010
4. Name and telephone number of person responsible for oil
spill prevention at facility:
Name and Title: Steve Ellis, Facilities Manager
Phone: (704) 687-2088
- *5. Facility Contact:
Name and Title: John Frazier, Facility Engineer
Phone: (704) 687-2145

Emergency Coordinators:

*Primary: John Frazier, Facility Engineer
P.O. Box 18226
Asheville, NC 28814
(704) 687-2145 (Office)
(704) 258-9304 (Home)

1st Alternate: Steve Ellis, Facilities Manager
17 Carriage Court
Hendersonville, NC 28739
(704) 687-2088 (Office)
(704) 891-9682 (Home)

*2nd Alternate: Jerry Bukoski, Maintenance Manager
1000 Ridgeview Drive
Hendersonville, NC 28739
(704) 687-2208 (Office)
(704) 693-5795 (Home)

*3rd Alternate: Jim Hollis, Industrial Engineer
9 Hoyt Road
Arden, NC 28704
(704) 687-2092 (Office)
(704) 684-5518 (Home)

- A. The Emergency Coordinator serves as Chief of the Emergency Response Team which is complete on each operating shift. these personnel have received intensive additional emergency training above regular plant emergency training.
- B. The Emergency Coordinator can deputize other employees to assist them in the event of an emergency.
- C. The Emergency Coordinator will have full authority to commit the resources needed to carry out the contingency plan.
- D. At all times, at least one of the Emergency Coordinators is on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time.

HAZARDOUS WASTE
EMERGENCY NUMBERS

| | |
|--|---|
| Henderson Co. Emergency Mgt. Coordinator | (704) 693-8411 |
| N. C. Emergency Management Coordinator | (800) 662-7956 |
| National Response Center | (800) 424-8802 |
| Fletcher Volunteer Fire Department | 911 |
| Henderson County Sheriff's Office | 911 |
| St. Joseph's Hospital | (704) 255-3100 |
| St. Joseph's Urgent Care Center | (704) 274-1462 |
| Memorial Mission Hospital | (704) 255-4000 |
| Emergency Coordinators: | |
| * Primary: John Frazier | (704) 687-2145 (Office) (704) 258-9304 (Home) |
| 1st Alternate: Steve Ellis | (704) 687-2088 (Office) (704) 891-9682 (Home) |
| * 2nd Alternate: Jerry Bukoski | (704) 687-2208 (Office) (704) 693-5795 (Home) |
| * 3rd Alternate: Jim Hollis | (704) 687-2092 (Office) (704) 684-5518 (Home) |
| * Rockwell Security Guard: | (704) 687-2097 (Inside) (704) 687-2140 (Outside) |
| Rockwell Nurse: | (704) 687-2100/2101 |

- f. Inform the area supervisor of the cause of spill and of new procedures which will prevent them in the future.

5. Facilities Manager

- a. If the spill reaches or is expected to reach surface waters or land in any quantity, call the North Carolina Department of natural Resources and Community Development (NCDNRCD), The United States Coast Guard (USCG), and the Environmental Protection Agency (EPA) as soon as possible and no later than one hour after the spill has been discovered.

NCDNRCD

| | |
|-------------------------------|----------------|
| * Regional Office (Asheville) | (704) 251-6208 |
| State Office (Raleigh) | (919) 733-5291 |
| After Hours (Local) Max Haner | (704) 252-5334 |
| Gary Tweed | (704) 667-9704 |
| Roy Davis | (704) 258-3358 |
| Forrest Westall | (704) 675-5234 |
| (State) | (800) 662-7956 |

EPA

Oil spills and Hazardous Discharges (Atlanta)

8:00 a.m. - 5:00 p.m. work week (404) 881-3931

7 Day, 24 Hour (404) 881-4602

USCG

Oil Spills and Hazard Discharges

(Washington) 7 Day, 24 Hour

Tool Free (800) 424-8802

OIL SPILL ALERT OUTLINE

| | |
|--|-------------------|
| Spill Detection - (Actual or Possible) | Within |
| Notify Immediate Supervisor | 15 |
| Notify Maintenance Supervisor | Minutes |
| Phone Numbers - Ext. 2166, 2167, 2168 | |
| Begin containment and clean up procedures | Within |
| Notify Production Manager | 30 |
| Notify Maintenance Manager (2208) | Minutes |
| Notify Plant Security (2097) | |
| Clean up begins immediately and continues until complete. If spill has or will reach surface waters, notify the Facilities Manager. (2088) | |
| Provide additional labor if necessary | Within |
| If spill reaches surface waters - | 60 |
| Facilities Manager | Minutes |
| notifies the following: | |
| North Carolina Department of Natural Resources & Community Development | * (704) 251-6208 |
| After Hours | (704) 252-5334 |
| Environmental Protection Agency | (404) 881-4062 |
| U. S. Coast Guard | (800) 424-8802 |
| Source identified and corrected | Within |
| Clean up complete | 24 Hours |
| If applicable, submit SPCC Plan to EPA and NCDNRCD for their review | Within 60 Days |

Rockwell

Introduction

On January 10, 1974, spill prevention regulations to prevent oil pollution became law. The purpose of these regulations is "to prevent harmful discharges of oil into navigable waters and to contain such discharges if they occur". The definition of a "harmful discharge" is one which would cause a sheen or discoloration of the surface of the water or a sludge or emulsion to be deposited beneath the surface of the water. The "Oil Pollution and Hazardous Substance Control Act", North Carolina General Statute 143-215.75, addresses spills of oils and reportable quantities of hazardous substances not only to surface waters or their proximity, but also to the land, whether or not surface waters are likely to be affected. The regulations require the development and implementation of a spill prevention control and countermeasure (SPCC) plan for all applicable facilities.

The Resource Conservation and Recovery Act (RCRA) of 1976 establishes rules and regulations for generators, transporters, treaters, and disposers of hazardous waste. One of the regulations that affects generators (which we are) is the development of a hazardous waste management facility contingency plan.

Since the start-up of this facility, we have maintained two separate plans. However, to avoid confusion and duplication, we have now combined these plans to form one comprehensive plan. Authorization for this combination is given in 40 Code of Federal Regulations 254.52(b).

In a sincere effort to conform with these regulations, Rockwell International Corporation has prepared the following plan for the Asheville On-Highway Products Division Plant at Fletcher, North Carolina. The applicability of the regulations is premised on the types and volume of hazardous wastes produced, the volume of oil type materials stored at the site, and the reasonable chance of a spill event resulting in a "harmful discharge." To facilitate the determination of criteria and in accordance with good engineering practice, it has been necessary to estimate the most probable modes of failure.

Amended November 5, 1987

Rockwell

f. Inform the area supervisor of the cause of spill and of new procedures which will prevent them in the future.

5. Plant Engineer

a. If the spill reaches or is expected to reach surface waters or land in any quantity, call the North Carolina Department of Natural Resources and Community Development (NCDNRCD), The United States Coast Guard (USCG), and the Environmental Protection Agency (EPA) as soon as possible and no later than one hour after the spill has been discovered.

NCDNRCD

| | |
|-------------------------------|----------------|
| Regional Office (Asheville) | (704) 253-3341 |
| State Office (Raleigh) | (919) 733-5291 |
| After Hours (Local) Max Haner | (704) 252-5334 |
| Gary Tweed | (704) 667-9704 |
| Roy Davis | (704) 258-3358 |
| Forrest Westall | (704) 675-5234 |
| (State) | (800) 662-7956 |

EPA

| | |
|---|----------------|
| Oil Spills and Hazardous Discharges (Atlanta) | |
| 8:00 a.m. - 5:00 p.m. work week | (404) 881-3931 |
| 7 Day, 24 Hour | (404) 881-4062 |

USCG

| | |
|-------------------------------------|----------------|
| Oil Spills and Hazardous Discharges | |
| (Washington) 7 Day, 24 Hour | |
| Toll Free | (800) 424-8802 |

Amended November 5, 1987



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 18 1987

4WD-RCRA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jim Hollis
Rockwell International Corp.
1000 Rockwell Drive
Fletcher, North Carolina 28732

RE: Notice of Violation
EPA I.D. Number: NCD 057 174 658

Dear Mr. Hollis:

Pursuant to Section 3006(g) [42 U.S.C. 6926(g)] of the Hazardous and Solid Waste Amendments of 1984, any new requirements and prohibitions imposed under the Resource Conservation and Recovery Act (RCRA) take effect in authorized States. Therefore, the Environmental Protection Agency (EPA) will carry out these requirements and prohibitions in authorized States, until the State is granted authorization to do so. The EPA will therefore enforce the prohibitions on land disposal of hazardous waste as published in the Federal Register on November 7, 1986, and effective on November 8, 1986. Currently the land disposal restrictions apply to spent solvent wastes specified in 40 CFR 261.31 as EPA Hazardous Waste Numbers F001, F002, F003, F004, and F005. Rockwell has been identified as a generator of the following spent solvent(s): F003.

On July 21, 1987, the North Carolina Solid and Hazardous Waste Management Branch conducted an inspection of your facility to determine compliance with applicable regulations. This Notice of Violation only addresses violations of the land disposal restrictions identified during the inspection. The following violation was identified:

40 CFR 268.7(a)(1) states that for a generator who manages a restricted waste under this part and the waste requires treatment prior to land disposal, for each shipment of the waste, the generator must notify the treatment facility in writing of the appropriate treatment standard set forth in 40 CFR 268 Subpart D. The notice must include the following information:

- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standard;
- (iii) The manifest number associated with the shipment of waste;
and
- (iv) Waste analysis data, where available.

Rockwell was failing to send the aforementioned written notification with each shipment of solvents as required, effective November 8, 1986.

Information documenting the correction of this violation must be submitted to the Agency within thirty (30) days of receipt of this letter.

The facility must comply with 40 CFR 268.7(a)(1) for all future shipments of hazardous waste solvents (F001, F002, F003, F004, and F005). If the above requirement is not met, pursuant to Section 3008 of RCRA [42 U.S.C. 6929], a penalty of up to 25,000 dollars per day may be assessed.

If you should have any questions, please contact David Ellison of my staff at 404/347-7603.

Sincerely yours,



Patrick M. Tobin, Director
Waste Management Division

cc: William Meyer, North Carolina Solid & Hazardous Waste Mgmt. Branch

NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES

SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

P.O. BOX 2091 RALEIGH, NORTH CAROLINA 27602-2091

306 N. WILMINGTON ST.

INSPECTION ACTIONS

STAFF ID: 17 NAME: JAMES E PATTERSON INSPECTION DATE: 5 6 86

EPA ID NO. NCD 057 174 658 NAME: Rockwell International Corp.

ADDRESS: 1000 Rockwell Drive CITY: Fletcher

NEW: UP DATE: FACILITY CONTACT: Jim Hollis

AGENCY RESP. FOR INSPECTION: STATE: EPA: JOINT: EPA OVERSIGHT

RCRA CLASS: GEN: TRANS: INTERIM TSDF: PERMITTED TSDF

TYPE OF INSPECTION: 1 = (RCRA) EVALUATION 6 = OTHER (COMPLAINT)
2 = SAMPLING 7 = OTHER (PART B CALL)
3 = RECORD REVIEW 8 = OTHER (WITHDRAWAL)
4 = GROUND WATER 9 = OTHER (CLOSED FAC.)
5 = FOLLOW UP 10 = OTHER (GENERAL)

LOCATION: ON SITE: FIELD OFFICE: RALEIGH OFFICE: OTHER

RESULT: IN COMPLIANCE: IN VIOLATION-DOCKET NO. _____

AREAS IN VIOLATION: _____ SG .261: _____ TSDF.264: _____ GW. 264: _____ CONT. 264:
_____ GEN.262: _____ TSDF.265: _____ GW. 265: _____ CONT. 265:
_____ TRN.263: _____ C/CP.264: _____ FIN.264: _____ MF. 264:
_____ PER.270: _____ C/CP.265: _____ FIN.265: _____ MF. 265:

HANDLING METHODS: _____ CNTR.264: _____ INCN.264: _____ SURF.264
_____ CNTR.265: _____ INCN.265: _____ SURF.265:

ENFORCEMENT ACTION _____ 3007 LETTER _____ WARNING LETTER _____ INFORMAL
_____ FILED CIVIL ACTION _____ FILED CRIMINAL ACTION
_____ ADMINISTRATIVE ORDER OR CONSENT ORDER
_____ 3008 FINAL ORDER

PENALTY RECOMMENDED \$ _____

SCHEDULED REINSPECTION DATES: 1 _____ 2 _____ 3 _____
4 _____ 5 _____ 6 _____

COMMENTS _____

GENERATOR INSPECTION FORM - PART 262

Rockwell International Corp. NC D 057 174 658
 Name of Site EPA I.D. Henderson County
1000 Rockwell Dr., Fletcher 5/6/86
 Location Inspection Date
 Signature of Inspector(s) James E. Patterson
 Signature of Facility Contact Jim Hollis
 Compliance Date

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)

CONTAINER/TANK INSPECTION FORM - PART 265

Rockwell International Corp

NCD 057 174 658

5/6/86

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: NO VIOLATIONS

NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES

SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

P.O. BOX 2091 RALEIGH, NORTH CAROLINA 27602-2091

306 N. WILMINGTON ST.

INSPECTION ACTIONS

STAFF ID: 17 NAME: Jim Patterson INSPECTION DATE: 2 26 86

EPA ID NO. NCD 057174658 NAME: Rockwell International Corp

ADDRESS: 1000 ROCKWELL DRIVE CITY: Fletcher

NEW: ___ UP DATE: [check] FACILITY CONTACT: Jim Hollis

AGENCY RESP. FOR INSPECTION: [check] STATE: ___ EPA: ___ JOINT: ___ EPA OVERSIGHT

RCRA CLASS: [check] GEN: ___ TRANS: ___ INTERIM TSDF: ___ PERMITTED TSDF

TYPE OF INSPECTION: 10 1 = (RCRA) EVALUATION 6 = OTHER (COMPLAINT)
ATA - Discussion of RCRA 2 = SAMPLING 7 = OTHER (PART B CALL)
with GROUP of 3 = RECORD REVIEW 8 = OTHER (WITHDRAWAL)
employees 4 = GROUND WATER 9 = OTHER (CLOSED FAC.)
5 = FOLLOW UP 10 = OTHER (GENERAL)

LOCATION: [check] ON SITE: ___ FIELD OFFICE: ___ RALEIGH OFFICE: ___ OTHER

RESULT: ___ IN COMPLIANCE: ___ IN VIOLATION-DOCKET NO. ___

AREAS IN VIOLATION: SG .261: ___ TSDF.264: ___ GW. 264: ___ CONT. 264:
GEN.262: ___ TSDF.265: ___ GW. 265: ___ CONT. 265:
TRN.263: ___ C/CP.264: ___ FIN.264: ___ MF. 264:
PER.270: ___ C/CP.265: ___ FIN.265: ___ MF. 265:

HANDLING METHODS: CNTR.264: ___ INCN.264: ___ SURF.264
CNTR.265: ___ INCN.265: ___ SURF.265:

ENFORCEMENT ACTION 3007 LETTER ___ WARNING LETTER ___ INFORMAL
FILED CIVIL ACTION ___ FILED CRIMINAL ACTION
ADMINISTRATIVE ORDER OR CONSENT ORDER
3008 FINAL ORDER

PENALTY RECOMMENDED \$ ___

SCHEDULED REINSPECTION DATES: 1 ___ 2 ___ 3 ___
4 ___ 5 ___ 6 ___

COMMENTS MEETING WITH ROCKWELL EMPLOYEES CONCERNING RCRA. The following Rockwell
employees attended the Meeting: Phil Backlund (Engineering & Environmental Mgr from Tracy Mich)
Jim Hollis (mtg engineer - Fletcher), Steve Ellis (PLANT ENGINEERING & MAINTENANCE - FLETCHER)
Doug Judkins (SAFETY-SECURITY-FLETCHER), JOHN FRAZIER (FACILITIES ENGINEER - FLETCHER)

NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES

SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

P.O. BOX 2091 RALEIGH, NORTH CAROLINA 27602-2091

306 N. WILMINGTON ST.

INSPECTION ACTIONS

STAFF ID: 17 NAME: James E Patterson INSPECTION DATE: 2 16 76

EPA ID NO. NCD057174658 NAME: Rocky Mountain International Corp

ADDRESS: 1000 Rockwell Drive CITY: FREDERICK

NEW: UP DATE: FACILITY CONTACT:

AGENCY RESP. FOR INSPECTION: STATE: EPA: JOINT: EPA OVERSIGHT

RCRA CLASS: GEN: TRANS: INTERIM TSDF: PERMITTED TSDF

TYPE OF INSPECTION: 10 1 = (RCRA) EVALUATION 6 = OTHER (COMPLAINT)
ATH: REVIEW OF 2 = SAMPLING 7 = OTHER (PART B CALL)
RCRA REQUIREMENTS 3 = RECORD REVIEW 8 = OTHER (WITHDRAWAL)
4 = GROUND WATER 9 = OTHER (CLOSED FAC.)
5 = FOLLOW UP 10 = OTHER (GENERAL)

LOCATION: ON SITE: FIELD OFFICE: RALEIGH OFFICE: OTHER

RESULT: IN COMPLIANCE: IN VIOLATION-DOCKET NO.

AREAS IN VIOLATION: SG .261: TSDF.264: GW. 264: CONT. 264:
GEN.262: TSDF.265: GW. 265: CONT. 265:
TRN.263: C/CP.264: FIN.264: MF. 264:
PER.270: C/CP.265: FIN.265: MF. 265:

HANDLING METHODS: CNTR.264: INCN.264: SURF.264
CNTR.265: INCN.265: SURF.265:

ENFORCEMENT ACTION 3007 LETTER WARNING LETTER INFORMAL
FILED CIVIL ACTION FILED CRIMINAL ACTION
ADMINISTRATIVE ORDER OR CONSENT ORDER
3008 FINAL ORDER

PENALTY RECOMMENDED \$

SCHEDULED REINSPECTION DATES: 1 2 3
4 5 6

COMMENTS



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

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

December 17, 1985

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

Mr. James E. Hollis, Jr.
Manufacturing Engineer
Rockwell International
1000 Rockwell Drive
Fletcher, North Carolina 28732

Dear Mr. Hollis:

Subject: Disposal of 60 drums of initially Dried Paint at
Henderson County Landfill

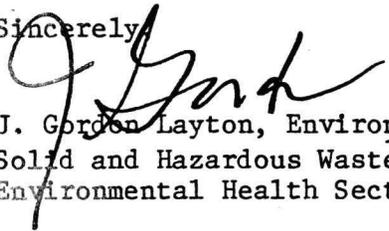
The Division of Health Services has received a request for characterization of the subject waste. Based upon the submitted information, the waste appears to be non-hazardous. The Division of Health Services has no objection to the sanitary landfill disposal of this waste if in accordance with the conditions below:

1. The waste remains non-hazardous as determined by the current North Carolina Hazardous Waste Rules.
2. The owner/operator of the landfill approves the disposal.
3. The waste is removed from the drums before disposal.

Failure to meet these conditions may result in revocation of this approval and an administrative penalty. This approval is subject to change if new regulations were to prohibit this practice. If the process which generates the waste changes or if the composition of the waste changes significantly, this approval is voided, and re-evaluation of the waste will be required prior to disposal.

If you have any questions concerning this matter, please contact our office at (919) 733-2178.

Sincerely,


J. Gordon Layton, Environmental Engineer
Solid and Hazardous Waste Management Branch
Environmental Health Section

JGL:pgb

cc: Jim Patterson ✓
Henderson County Landfill

OK
JR

STATE OF NORTH CAROLINA
DEPARTMENT OF HUMAN RESOURCES
Division of Health Services
ENVIRONMENTAL HEALTH SECTION
Solid & Hazardous Waste Management Branch



PROCEDURE AND CRITERIA FOR WASTE DETERMINATION

This procedure will be used by the Division of Health Services to determine whether a waste is (1) hazardous as defined by 10 NCAC 10F, and (2) suitable for disposal at a solid waste management facility.

The types of wastes that will be evaluated by this procedure are primarily, but not exclusively, industrial and commercial wastes and sludges, and Publicly Owned Treatment Works sludges.

The Division of Health Services reserves the right to request additional information or waive some of the requirements based on the type of waste if it deems necessary. The Division may also require some wastes to be treated or altered to render the waste environmentally immobile prior to disposal at a sanitary landfill. Wastes disposed at sanitary landfills must be non-liquid and in a form that can be confined, compacted, and covered in accordance with the "Solid Waste Management Rules". APPROVAL TO DISPOSE OF THE WASTE SHALL ALSO BE OBTAINED FROM THE OWNER OR OPERATOR OF THE LANDFILL PRIOR TO DISPOSAL.

The following information is required for an evaluation. An asterisk (*) denotes information required for Publicly Owned Treatment Works.

* GENERAL INFORMATION

①
②

1. Name and address of facility or person generating waste _____
Rockwell International
1000 Rockwell Drive, Fletcher, NC 28732
2. What is the waste? Dried Paint
60 drums of
3. What volume of disposal will there be? Approx. 60 drums initially
of
4. What frequency of disposal will there be? 4-6 drums monthly
5. Explain either the manufacturing process or how the waste was generated. Electrostatic paint spray booth generates dried paint on walls in water wash booth due to overspray as contained by the booth. Waste generated for disposal is obtained by bi-weekly cleaning of the booth.

INFORMATION FOR HAZARDOUS (RCRA) DETERMINATION (10 NCAC 10F .0029)

1. Is the waste listed under .0029(e) (i.e., 40 CFR 261.31 - 261.33)?
If yes, list number. No
2. Does the waste exhibit any of the four characteristics as defined by
.0029(d) (i.e., 40 CFR 261.21 - 261.24)? (Attach lab results)
* (EP Toxicity for metals and pH). No

INFORMATION FOR LANDFILLING DETERMINATION

1. Does the waste contain any hazardous waste constituents listed in
.0029(e), Appendix VIII (i.e., 40 CFR 261, Appendix VIII)? If yes,
what constituents and what concentration? (Attach lab results.)
See lab results.
2. What other constituents are present and in what concentration? (Attach
lab results.) See lab results
- * 3. What is the moisture content? < 5%
- 4 * Which solid waste management facility is the request for?
Henderson County Sanitary Landfill
- * 5. Specify how the waste will be delivered - in bulk or containers (i.e.,
barrels, bags, etc.)? Open-top barrels

"I hereby certify that the information submitted in regard to
Dried Paint (name of waste) is true and correct to
the best of my knowledge and belief."

3

James E. Hollis, Jr. 11/1/85
(signature)

James E. Hollis, Jr.
Manufacturing Engineer

All questions concerning this "Procedure" should be directed to
Gordon Layton or Jerry Rhodes at (919) 733-2178. Answer specific
questions in space provided. Attach additional sheets if necessary.

Complete all information, sign and submit to:

Division of Health Services
Solid & Hazardous Waste Management Branch
P. O. Box 2091
Raleigh, NC 27602

Attn: Waste Determination

On-Highway Axle Division
Rockwell International Corporation
1000 Rockwell Drive
Fletcher, North Carolina 28732



Rockwell
International

August 21, 1985

Mr. J. W. Moore, Jr.
Department of Human Resources
Western Regional Office
Building # 3
Black Mountain, North Carolina 28711

Dear Mr. Moore:

Enclosed is our revised Hazardous Waste Management Facility Contingency Plan for the Rockwell International Plant located in Fletcher, North Carolina. This Contingency Plan is for the Rockwell International Plant to be in compliance with the North Carolina Hazardous Waste Management Rules as established by the Department of Human Resources.

Please distribute copies to all concerned departments within your organization.

Thank you for your cooperation concerning this matter. If questions or other comments should develop, contact me at (704) 687-2145 for clarification.

Sincerely,

John Frazier
Facilities Engineer

JF:ls
Attachments:

On-Highway Axle Division
Rockwell International Corporation
1000 Rockwell Drive
Fletcher, North Carolina 28732



April 19, 1985

Mr. J. W. Moore, Jr.
Department of Human Resources
Western Regional Office
Building # 3
Black Mountain, North Carolina 28711

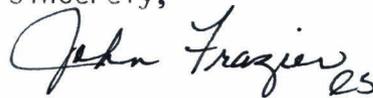
Dear Mr. Moore:

Enclosed is our revised Hazardous Waste Management Facility Contingency Plan for the Rockwell International Plant located in Fletcher, North Carolina. This Contingency Plan is for the Rockwell International Plant to be in compliance with the North Carolina Hazardous Waste Management Rules as established by the Department of Human Resources.

Please distribute copies to all concerned departments within your organization.

Thank you for your cooperation concerning this matter. If questions or other comments should develop, contact me at (704) 687-2145 for clarification.

Sincerely,



John Frazier
Facilities Engineer

JF/lis

Attachment:

CC: S. Ellis



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

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

August 20, 1984

JOHN FRAZIER
Rockwell International Corp.
1000 Rockwell Dr.
Fletcher, NC 28732
EPA NUMBER: NCD057174658

Dear Mr. Frazier:

The United States Environmental Protection Agency has granted the State of North Carolina 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.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 07/31/84 by Mr. J. W. MOORE JR., Solid and Hazardous Waste Management Branch. The inspection revealed compliance with the regulations. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,


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

copy: J. W. MOORE JR.

On-Highway Axle Division
Rockwell International Corporation
1000 Rockwell Drive
Fletcher, North Carolina 28732



Rockwell
International

April 19, 1985

Tom Sullivan
J. D. Moore



THIS FACILITY IS LISTED AS A GENERATOR ONLY.

Tom 4/23/85

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

Dear Mr. Strickland:

Enclosed is our revised Hazardous Waste Management Facility Contingency Plan for the Rockwell International Plant located in Fletcher, North Carolina. This Contingency Plan is for the Rockwell International Plant to be in compliance with the North Carolina Hazardous Waste Management Rules as established by the Department of Human Resources.

Please distribute copies to all concerned departments within your organization.

Thank you for your cooperation concerning this matter. If questions or other comments should develop, contact me at (704) 687-2145 for clarification.

Sincerely,

John Frazier
Facilities Engineer

JF/lis

Attachment:

CC: S. Ellis

ROCKWELL INTERNATIONAL
ASHEVILLE PLANT
FLETCHER, NORTH CAROLINA

HAZARDOUS WASTE MANAGEMENT FACILITY
CONTINGENCY PLAN

THIS CONTINGENCY PLAN IS SUBMITTED IN COMPLIANCE WITH 40 CFR 265.

INDEX

1. GENERAL INFORMATION
2. EMERGENCY COORDINATORS
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6. COORDINATION AGREEMENTS
7. EVACUATION PLAN
8. REQUIRED REPORTS

DRAWINGS

SITE PLAN

EVACUATION PLAN

4-19-85 REVISION D

1. GENERAL INFORMATION

- 1.1 NAME: ROCKWELL INTERNATIONAL
ASHEVILLE PLANT
- 1.2 LOCATION: 1000 ROCKWELL DRIVE
FLETCHER, NORTH CAROLINA 28732
- 1.3 CONTACT: STEVE ELLIS
PLANT ENGINEERING & MAINTENANCE MANAGER
TELEPHONE: (704) 687-2088 (OFFICE)
(704) 891-8692 (HOME)
- 1.4 TYPE OF FACILITY HAZARDOUS WASTE
GENERATING FACILITY DUE TO
MANUFACTURING OF TRUCK AXLES.

2. EMERGENCY COORDINATORS

- 2.1 COORDINATORS
- STEVE ELLIS
PLANT ENGINEERING & MAINTENANCE MANAGER
TELEPHONE: (704) 687-2088 (OFFICE)
(704) 891-8692 (HOME)
- BOB HARDIN
SAFETY/SECURITY MANAGER
TELEPHONE: (704) 687-2104 (OFFICE)
(704) 692-8656 (HOME)
- BOB MILES
MAINTENANCE MANAGER
TELEPHONE: (704) 687-2084 (OFFICE)
(704) 891-9636 (HOME)
- JOHN FRAZIER
FACILITIES ENGINEER
TELEPHONE: (704) 687-2145 (OFFICE)
(704) 258-9304 (HOME)

- 2.2 FUNCTION: EMERGENCY COORDINATOR WILL MAKE SURE
THAT THE CAUSE OF THE EMERGENCY HAS
BEEN ELIMINATED AND THAT CLEAN-UP AND
RESTORATION HAVE PROGRESSED AT LEAST
TO THE POINT OF NOT JEOPARDIZING
THE HEALTH AND SAFETY OF THE ROCKWELL
EMPLOYEES, AND THAT EPA, STATE OF
NORTH CAROLINA, AND ALL LOCAL AUTHORITIES
HAVE BEEN NOTIFIED, BEFORE PERMITTING
RESUMPTION OF THE OPERATIONS AFFECTED
BY THE EMERGENCY.

3. IMPLEMENTATION OF THE CONTINGENCY PLAN

- 3.1 IN THE EVENT OF AN EMERGENCY SITUATION WITHIN THE CONFINES OF ROCKWELL'S PROPERTY THAT REQUIRES THE NOTIFICATION OF THE DESIGNATED EMERGENCY COORDINATORS AND/OR LOCAL EMERGENCY PERSONNEL THIS CONTINGENCY PLAN WILL BE USED FOR CONTROL OF THE EMERGENCY SITUATION.
- 3.2 THE PRIMARY AND/OR COORDINATORS WILL HAVE THE RESPONSIBILITY OF DOCUMENTING ALL EMERGENCY SITUATIONS AS TO THEIR OCCURRENCE WITHIN THE CONFINES OF ROCKWELL'S PROPERTY.

4. EMERGENCY RESPONSE PROCEDURES

4.1 NOTIFICATION:

THE EMERGENCY COORDINATOR WILL NOTIFY BY PHONE, EPA, STATE OF NORTH CAROLINA, AND ALL LOCAL AUTHORITIES AS REQUIRED OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN.

4.2 CONTROL AND CONTAINMENT:

THE EMERGENCY COORDINATOR WILL IMPLEMENT THE BEST MEANS OF CONTROL AND CONTAINMENT OF ANY EMERGENCY SITUATION THAT DEVELOPS ON THE ROCKWELL PROPERTY.

4.3 FOLLOW-UP:

4.3.1

THE EMERGENCY COORDINATOR WILL MAKE SURE THAT THE CAUSE OF THE EMERGENCY HAS BEEN ELIMINATED AND THAT CLEAN-UP AND RESTORATION HAVE PROGRESSED AT LEAST TO THE POINT OF NOT JEOPARDIZING THE HEALTH AND SAFETY OF THE ROCKWELL'S EMPLOYEES AND THAT EPA, STATE OF NORTH CAROLINA AND ALL LOCAL AUTHORITIES HAVE BEEN NOTIFIED, BEFORE PERMITTING RESUMPTION OF THE OPERATIONS AFFECTED BY THE EMERGENCY.

4.3.2

THE EMERGENCY COORDINATOR WILL NOTE IN THE OPERATING RECORD THE TIME, DATE AND DETAILS OF AN INCIDENT THAT REQUIRES IMPLEMENTATION OF THIS CONTINGENCY PLAN AND WILL SUBMIT A WRITTEN REPORT ON THE INCIDENT TO THE EPA REGIONAL ADMINISTRATOR IN ACCORDANCE WITH 40 CFR 265.67 (J).

5. EMERGENCY EQUIPMENT

- 5.1 EACH WORKING AREA IN THE FACILITY IS EQUIPPED WITH FIRE EXTINGUISHERS TO EXTINGUISH SMALL EQUIPMENT AND/OR FACILITY FIRES.
- 5.2 THE FACILITY IS EQUIPPED WITH FIRE HYDRANTS AND EQUIPMENT CABINETS CONTAINING HOSES, NOZZLES AND SPECIAL EQUIPMENT FOR FIGHTING FIRES AND TO PERMIT WASHING DOWN OF SMALL SPILLS.
- 5.3 THE CHIP BUILDING CONTAINS A SUPPLY OF ABSORBENT MATERIAL, SHOVELS AND OTHER CLEAN-UP EQUIPMENT.
- 5.4 THE FACILITY CONTAINS A FIRST-AID STATION THAT IS MAINTAINED AND STOCKED WITH MEDICAL SUPPLIES FOR INITIAL TREATMENT OF EMERGENCY INCIDENTS OR FACILITY ACCIDENTS.
- 5.5 THE FIRST-AID STATION IS EQUIPPED WITH A MOBILE STRETCHER FOR TRANSPORTING VICTIMS TO THE FIRST-AID STATION.
- 5.6 THE FACILITY IS EQUIPPED WITH A MOBILE FIRE CART FOR ASSISTING IN EMERGENCY SITUATIONS WITHIN THE CONFINES OF THE COMPANY PROPERTY.
- 5.7 THE FACILITY IS EQUIPPED WITH BREATHING APPARATUS (E.G., SCOTT AIR PACKS) LOCATED IN THE FIRST-AID STATION, ON THE MOBILE FIRE CART AND IN THE CHIP BUILDING.
- 5.8 THE FACILITY IS EQUIPPED WITH AN ALARM SYSTEM THAT CAN BE ACTIVATED FROM AND IS AUDIBLE IN EACH WORKING AREA.
- 5.9 THE FACILITY IS EQUIPPED WITH A PUBLIC ADDRESS SYSTEM THAT CAN BE ACTIVATED FROM AND IS AUDIBLE IN EACH WORKING AREA BY USE OF THE TELEPHONE SYSTEM.
- 5.10 THE TELEPHONE NUMBERS OF THE PRINCIPAL AND ALTERNATE EMERGENCY COORDINATORS, THE HENDERSON COUNTY SHERIFF'S DEPARTMENT, FLETCHER VOLUNTEER FIRE DEPARTMENT, MARGARET PARDEE MEMORIAL HOSPITAL, MEMORIAL MISSION HOSPITAL AND STATE EMERGENCY RESPONSE TEAM ARE DISPLAYED PROMINENTLY IN ALL ROCKWELL SECURITY OFFICES AND ALL TELEPHONES IN AND AROUND THE HAZARDOUS WASTE CONTAINMENT LOCATION.
- 5.11 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS ADEQUATE FIRE-FIGHTING EQUIPMENT AND CAN CALL ON ADDITIONAL FIRE-FIGHTING EQUIPMENT AS REQUIRED FROM NEIGHBORING FIRE DEPARTMENTS.
- 5.12 AMBULANCE SERVICE TO MARGARET PARDEE MEMORIAL HOSPITAL AND MEMORIAL MISSION HOSPITAL IS AVAILABLE IN THE EVENT OF INJURIES.

6. COORDINATION AGREEMENTS

6.1 HENDERSON COUNTY SHERIFF'S DEPARTMENT - (704) 692-2511.

6.1-1 THE HENDERSON COUNTY SHERIFF'S DEPARTMENT HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

6.2 FLETCHER VOLUNTEER FIRE DEPARTMENT - (704) 692-3233.

6.2-1 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

6.2-2 THE FLETCHER VOLUNTEER FIRE DEPARTMENT WILL TOUR AND INSPECT THE FACILITY TWICE A YEAR AND REPORT TO THE EMERGENCY COORDINATOR ANY POTENTIAL EMERGENCY PROBLEMS.

6.2-3 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS IDENTIFIED SOURCES OF ADDITIONAL SUPPORT FOR EMERGENCIES BEYOND ITS OWN CAPABILITIES.

6.3 MARGARET PARDEE MEMORIAL HOSPITAL - (704) 693-6522

6.3-1 THE MARGARET PARDEE MEMORIAL HOSPITAL HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

6.4 MEMORIAL MISSION HOSPITAL - (704) 255-4000.

6.4-1 THE MEMORIAL MISSION HOSPITAL HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

6.5 STATE EMERGENCY RESPONSE TEAM - (704) 258-6152

6.5-1 THE STATE EMERGENCY RESPONSE TEAM HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

7. EVACUATION PLAN

7.1 WHEN EMERGENCY SITUATION DEVELOPES, FACILITY PERSONNEL SHOULD ACTIVATE NEAREST ALARM STATION, CONTACT NEAREST SUPERVISOR AND CONTACT ROCKWELL'S SECURITY (EXT. 2097) IMMEDIATELY.

7.2 ROCKWELL'S SAFETY/SECURITY MANAGERS WILL ASSESS THE EXTENT OF THE EMERGENCY AND WILL INITIATE EVACUATION PROCEDURES BY USE OF THE PUBLIC ADDRESS SYSTEM.

7.3 WORKING AREAS WILL THEN EVACUATE THE FACILITY IN AN ORDERLY AND TIMELY FASHION AND LOCATE IN A PRE-DETERMINED LOCATION AS ASSIGNED AND POSTED IN WORK AREAS.

7.4 WHEN THE EMERGENCY SITUATION REQUIRES LOCAL AUTHORITIES TO CONTROL THE SITUATION, FACILITY PERSONNEL WILL RECEIVE DIRECTIONS FROM THE RESPONSIBLE PARTY IN CHARGE.

8. REQUIRED REPORTS

8.1 VERBAL REPORTS:

THE EMERGENCY COORDINATOR WILL NOTIFY EPA, STATE OF NORTH CAROLINA, AND ALL LOCAL AUTHORITIES OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN.

8.2 WRITTEN REPORTS

THE EMERGENCY COORDINATOR WILL NOTE IN THE OPERATING RECORD THE TIME, DATE AND DETAILS OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN AND WILL SUBMIT A WRITTEN REPORT ON THE EPA REGIONAL ADMINISTRATOR IN ACCORDANCE WITH 40 CFR 265.56 (J).

8.3 CONTINGENCY PLAN
REVISION REPORTS:

8.3-1

AFTER EACH ACCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN, THE EMERGENCY COORDINATOR WILL REVISE THIS CONTINGENCY PLAN IN ACCORDANCE WITH THE EXPERIENCE ACQUIRED DURING EACH EMERGENCY SITUATION AND WILL SEND COPIES OF THE REVISIONS TO EACH HOLDER OF THE ORIGINAL CONTINGENCY PLAN.

8.3-2

THE EMERGENCY COORDINATOR WILL REVISE THIS CONTINGENCY PLAN IN THE EVENT OF ANY CHANGES IN INFORMATION CONTAINED WITHIN THE ORIGINAL CONTINGENCY PLAN AND WILL SEND COPIES OF THE REVISIONS TO EACH HOLDER OF THE ORIGINAL CONTINGENCY PLAN.



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: 7/31/84

MEMORANDUM

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

FROM: J W MOORE JR.
W M S

NAME: Rockwell Inter. Corp.
Fletcher (City)

EPA ID No.: NC0057174658

CONTACT: John FRAZIER
(print)

A RCRA (Generator, () Transporter, () Interim Status, () Final Status, compliance inspection was conducted on 7/31/84. The in-
mo/day/yr

spection can be classified as a () annual inspection, (Gen, Trans.), () semi-annual inspection (TSD), (follow-up inspection, () other, specify (see instruction on back)

The above subject company was found (in full compliance () in violation () all previous violations existing () previous violations corrected - but new ones exist () previous violations existing along with additional ones. (Note: You should complete a check sheet to signify the additional violations).

A compliance date of _____ was established.
mo/day/yr

DHS 3218 3/84
Solid & Hazardous Waste



INSTRUCTIONS

The following types of inspections may be entered when checking (✓) "other": Sampling Inspections, Uncontrolled Site Evaluation, Non-notifier Inspection, Imminent Hazard Inspection, Complaint Inspection, Record Review, Ground Water Inspection, Other (specify).

The type of inspection entered must be accurate so that the computer can track Branch activities.



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: 6/28/84

MEMORANDUM

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

FROM: Jim Moore
wms

NAME: Rockwell Int.
Fletcher (City)

EPA ID No.: NC057174658

CONTACT: John Frazier, Facilities Eng
(print)

A RCRA () Generator, () Transporter, () Interim Status, () Final Status,
compliance inspection was conducted on 6/28/84. The in-
mo/day/yr
spection can be classified as a () annual inspection, (Gen, Trans.),
() semi-annual inspection (TSD), () follow-up inspection, () other,
specify (see instruction on back)

The above subject company was found () in full compliance () in violation
() all previous violations existing () previous violations corrected -
but new ones exist () previous violations existing along with additional
ones. (Note: You should complete a check sheet to signify the additional
violations).

A compliance date of 7/30/84 was established.
mo/day/yr

DHS 3218 3/84
Solid & Hazardous Waste

INSTRUCTIONS

The following types of inspections may be entered when checking (✓) "other": Sampling Inspections, Uncontrolled Site Evaluation, Non-notifier Inspection, Imminent Hazard Inspection, Complaint Inspection, Record Review, Ground Water Inspection, Other (specify).

The type of inspection entered must be accurate so that the computer can track Branch activities.

GENERATOR INSPECTION FORM - PART 262

Rockwell International Corp. NC0057174658 Henderson
 Name of Site EPA I.D. County
 Fletcher 6/28/84
 Location Inspection Date Signature of Inspector(s)
 7/30/84 Signature of Facility Contact

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

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 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)

- 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)

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)

- 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

- 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 D - RECORDKEEPING AND REPORTING

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

CONTAINER/TANK INSPECTION FORM - PART 265

Rockwell International NLD05 7174658 6/28/84
Name of Site EPA I.D. Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition Of Containers (265.171)

- leakage
- past leakage (evidence)
- severe rusting
- structural defect

1. General Operating Requirements (265.192)

- compatibility (a)(b)
- uncovered tank precautions (c)
- overflow prevention (d)

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance (leakage, corrosion)

2. Waste Analysis and Trial Tests (265.193)*

- *Section not applicable to a generator only
- waste analysis/trial test

3. Management of Containers (265.173)

- closed (a)
- improper handling or storage (b)

3. Inspections (265.194)

- discharge control equipment (a)(1)
- monitoring equipment (a)(2)
- waste level (a)(3)
- construction material (a)(4)
- surrounding area (a)(5)
- assessment schedule/procedures (b)

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

4. Closure (265.197)

- plan on-site

6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
- unwashed container (b)
- separation (c)

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

- properly stored (a)(1)(2)(3)
- buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.199)

- properly stored (a)
- tank washed (b)

REMARKS: _____



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

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

July 10, 1984

JOHN FRAZIER
Rockwell International Corp.
1000 Rockwell Dr.
Fletcher, NC 28732
EPA NUMBER: NCD057174658

RECEIVED
JUL 23 '84
WESTERN REGIONAL
OFFICE

Dear JOHN FRAZIER:

The United States Environmental Protection Agency has granted the State of North Carolina 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.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 06/28/84 by Mr. J. W. MOORE JR., Solid and Hazardous Waste Management Branch. The inspection revealed noncompliance in several areas. Attached is a copy of the inspection report which denotes the deficiencies.

A compliance date of 07/30/84 has been established for the correction of these deficiencies. If you have any questions pertaining to this subject, please contact Mr. William Paige, Environmental Engineer, at (919) 733-2178.

Sincerely,


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

copy: J. W. MOORE JR.

GENERATOR INSPECTION FORM - PART 262

| | | |
|------------------------------|------------------|-----------------|
| Name of Site | EPA I.D. | County |
| Rockwell International Corp. | NCD057174658 | Henderson |
| Location | Inspection Date | Inspector |
| Fletcher NC 28732 | 06 / 28 / 84 | J. W. MOORE JR. |
| Compliance Date | Facility Contact | |
| 07 / 30 / 84 | JOHN FRAZIER | |

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)
 - X accumulation date (a) (2)
 - 'Hazardous Waste' (a) (3)
 - Subpart C; D (a) (4) *
 - X personnel training (a) (4)

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - biennial/exception report (b)
 - test/waste analysis (c)
- 13. Biennial Reporting (262.41)
 - submitted (a) (1-6)
 - submitted (b)
- 14. Exception Reporting (262.42)
 - transporter contact (a)
 - exception report (b) (1) (2)

Remarks: 265.16 _____

On-Highway Axle Division
Rockwell International Corporation
1000 Rockwell Drive
Fletcher, North Carolina 28732



Rockwell
International

June 29, 1984



Mr. O. W. Strickland
Solid & Hazardous Waste Management Branch
Environmental Health Section
Department of Human Resources
Post Office Box 2091
Raleigh, North Carolina 27602

NC D057174653

Dear Mr. Strickland:

Enclosed is our revised Hazardous Waste Management Facility Contingency Plan for the Rockwell International Plant located in Fletcher, North Carolina. This Contingency Plan is for the Rockwell International Plant to be in compliance with the North Carolina Hazardous Waste Management Rules as established by the Department of Human Resources.

Please distribute copies to all concerned departments within your organization.

Thank you for your cooperation concerning this matter. If questions or other comments should develop, contact me at (704) 687-2024 for clarification.

Sincerely,

John Frazier
Facilities Engineer

JF/lc

Attachment

cc: S. Ellis

ROCKWELL INTERNATIONAL
ASHEVILLE PLANT
FLETCHER, NORTH CAROLINA

HAZARDOUS WASTE MANAGEMENT FACILITY
CONTINGENCY PLAN

THIS CONTINGENCY PLAN IS SUBMITTED IN COMPLIANCE WITH 40 CFR 265.

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6. COORDINATION AGREEMENTS
7. EVACUATION PLAN
8. REQUIRED REPORTS

DRAWINGS

SITE PLAN

EVACUATION PLAN

6-29-84 REVISION C

1. GENERAL INFORMATION

1.1 NAME: ROCKWELL INTERNATIONAL
ASHEVILLE PLANT

1.2 LOCATION: 1000 ROCKWELL DRIVE
FLETCHER, NORTH CAROLINA 28732

1.3 CONTACT: STEVE ELLIS
PLANT ENGINEERING MANAGER
TELEPHONE: (704) 687-2016 (OFFICE)
(704) 891-8692 (HOME)

1.4 TYPE OF FACILITY HAZARDOUS WASTE
GENERATING FACILITY DUE TO
MANUFACTURING OF TRUCK AXLES.

2. EMERGENCY COORDINATORS

2.1 COORDINATORS

STEVE ELLIS
PLANT ENGINEERING MANAGER
TELEPHONE: (704) 687-2016 (OFFICE)
(704) 891-8692 (HOME)

BOB HARDIN
SAFETY/SECURITY MANAGER
TELEPHONE: (704) 687-2104 (OFFICE)
(704) 692-8656 (HOME)

BOB MILES
MAINTENANCE MANAGER
TELEPHONE: (704) 687-2084 (OFFICE)
(704) 891-9636 (HOME)

JOHN FRAZIER
FACILITIES ENGINEER
TELEPHONE: (704) 687-2024 (OFFICE)
(704) 258-9304 (HOME)

2.2 FUNCTION:

EMERGENCY COORDINATOR WILL MAKE SURE THAT THE CAUSE OF THE EMERGENCY HAS BEEN ELIMINATED AND THAT CLEAN-UP AND RESTORATION HAVE PROGRESSED AT LEAST TO THE POINT OF NOT JEOPARDIZING THE HEALTH AND SAFETY OF THE ROCKWELL EMPLOYEES, AND THAT EPA, STATE OF NORTH CAROLINA, AND ALL LOCAL AUTHORITIES HAVE BEEN NOTIFIED, BEFORE PERMITTING RESUMPTION OF THE OPERATIONS AFFECTED BY THE EMERGENCY.

3. IMPLEMENTATION OF THE CONTINGENCY PLAN

- 3.1 IN THE EVENT OF AN EMERGENCY SITUATION WITHIN THE CONFINES OF ROCKWELL'S PROPERTY THAT REQUIRES THE NOTIFICATION OF THE DESIGNATED EMERGENCY COORDINATORS AND/OR LOCAL EMERGENCY PERSONNEL THIS CONTINGENCY PLAN WILL BE USED FOR CONTROL OF THE EMERGENCY SITUATION.
- 3.2 THE PRIMARY AND/OR COORDINATORS WILL HAVE THE RESPONSIBILITY OF DOCUMENTING ALL EMERGENCY SITUATIONS AS TO THEIR OCCURRENCE WITHIN THE CONFINES OF ROCKWELL'S PROPERTY.

4. EMERGENCY RESPONSE PROCEDURES

4.1 NOTIFICATION:

THE EMERGENCY COORDINATOR WILL NOTIFY BY PHONE, EPA, STATE OF NORTH CAROLINA, AND ALL LOCAL AUTHORITIES AS REQUIRED OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN.

4.2 CONTROL AND CONTAINMENT:

THE EMERGENCY COORDINATOR WILL IMPLEMENT THE BEST MEANS OF CONTROL AND CONTAINMENT OF ANY EMERGENCY SITUATION THAT DEVELOPS ON THE ROCKWELL PROPERTY.

4.3 FOLLOW-UP:

4.3.1

THE EMERGENCY COORDINATOR WILL MAKE SURE THAT THE CAUSE OF THE EMERGENCY HAS BEEN ELIMINATED AND THAT CLEAN-UP AND RESTORATION HAVE PROGRESSED AT LEAST TO THE POINT OF NOT JEOPARDIZING THE HEALTH AND SAFETY OF THE ROCKWELL'S EMPLOYEES AND THAT EPA, STATE OF NORTH CAROLINA AND ALL LOCAL AUTHORITIES HAVE BEEN NOTIFIED, BEFORE PERMITTING RESUMPTION OF THE OPERATIONS AFFECTED BY THE EMERGENCY.

4.3.2

THE EMERGENCY COORDINATOR WILL NOTE IN THE OPERATING RECORD THE TIME, DATE AND DETAILS OF AN INCIDENT THAT REQUIRES IMPLEMENTATION OF THIS CONTINGENCY PLAN AND WILL SUBMIT A WRITTEN REPORT ON THE INCIDENT TO THE EPA REGIONAL ADMINISTRATOR IN ACCORDANCE WITH 40 CFR 265.67 (J).

5. EMERGENCY EQUIPMENT

- 5.1 EACH WORKING AREA IN THE FACILITY IS EQUIPPED WITH FIRE EXTINGUISHERS TO EXTINGUISH SMALL EQUIPMENT AND/OR FACILITY FIRES.
- 5.2 THE FACILITY IS EQUIPPED WITH FIRE HYDRANTS AND EQUIPMENT CABINETS CONTAINING HOSES, NOZZLES AND SPECIAL EQUIPMENT FOR FIGHTING FIRES AND TO PERMIT WASHING DOWN OF SMALL SPILLS.
- 5.3 THE CHIP BUILDING CONTAINS A SUPPLY OF ABSORBENT MATERIAL, SHOVELS AND OTHER CLEAN-UP EQUIPMENT.
- 5.4 THE FACILITY CONTAINS A FIRST-AID STATION THAT IS MAINTAINED AND STOCKED WITH MEDICAL SUPPLIES FOR INITIAL TREATMENT OF EMERGENCY INCIDENTS OR FACILITY ACCIDENTS.
- 5.5 THE FIRST-AID STATION IS EQUIPPED WITH A MOBILE STRETCHER FOR TRANSPORTING VICTIMS TO THE FIRST-AID STATION.
- 5.6 THE FACILITY IS EQUIPPED WITH A MOBILE FIRE CART FOR ASSISTING IN EMERGENCY SITUATIONS WITHIN THE CONFINES OF THE COMPANY PROPERTY.
- 5.7 THE FACILITY IS EQUIPPED WITH BREATHING APPARATUS (E.G., SCOTT AIR PACKS) LOCATED IN THE FIRST-AID STATION, ON THE MOBILE FIRE CART AND IN THE CHIP BUILDING.
- 5.8 THE FACILITY IS EQUIPPED WITH AN ALARM SYSTEM THAT CAN BE ACTIVATED FROM AND IS AUDIBLE IN EACH WORKING AREA.
- 5.9 THE FACILITY IS EQUIPPED WITH A PUBLIC ADDRESS SYSTEM THAT CAN BE ACTIVATED FROM AND IS AUDIBLE IN EACH WORKING AREA BY USE OF THE TELEPHONE SYSTEM.
- 5.10 THE TELEPHONE NUMBERS OF THE PRINCIPAL AND ALTERNATE EMERGENCY COORDINATORS, THE HENDERSON COUNTY SHERIFF'S DEPARTMENT, FLETCHER VOLUNTEER FIRE DEPARTMENT, MARGARET PARDEE MEMORIAL HOSPITAL, MEMORIAL MISSION HOSPITAL AND STATE EMERGENCY RESPONSE TEAM ARE DISPLAYED PROMINENTLY IN ALL ROCKWELL SECURITY OFFICES AND ALL TELEPHONES IN AND AROUND THE HAZARDOUS WASTE CONTAINMENT LOCATION.
- 5.11 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS ADEQUATE FIRE-FIGHTING EQUIPMENT AND CAN CALL ON ADDITIONAL FIRE-FIGHTING EQUIPMENT AS REQUIRED FROM NEIGHBORING FIRE DEPARTMENTS.
- 5.12 AMBULANCE SERVICE TO MARGARET PARDEE MEMORIAL HOSPITAL AND MEMORIAL MISSION HOSPITAL IS AVAILABLE IN THE EVENT OF INJURIES.

6. COORDINATION AGREEMENTS

- 6.1 HENDERSON COUNTY SHERIFF'S DEPARTMENT - (704) 692-2511.
 - 6.1-1 THE HENDERSON COUNTY SHERIFF'S DEPARTMENT HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.
- 6.2 FLETCHER VOLUNTEER FIRE DEPARTMENT - (704) 692-3233.
 - 6.2-1 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.
 - 6.2-2 THE FLETCHER VOLUNTEER FIRE DEPARTMENT WILL TOUR AND INSPECT THE FACILITY TWICE A YEAR AND REPORT TO THE EMERGENCY COORDINATOR ANY POTENTIAL EMERGENCY PROBLEMS.
 - 6.2-3 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS IDENTIFIED SOURCES OF ADDITIONAL SUPPORT FOR EMERGENCIES BEYOND ITS OWN CAPABILITIES.
- 6.3 MARGARET PARDEE MEMORIAL HOSPITAL - (704) 693-6522
 - 6.3-1 THE MARGARET PARDEE MEMORIAL HOSPITAL HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.
- 6.4 MEMORIAL MISSION HOSPITAL - (704) 255-4000.
 - 6.4-1 THE MEMORIAL MISSION HOSPITAL HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.
- 6.5 STATE EMERGENCY RESPONSE TEAM - (704) 258-6152
 - 6.5-1 THE STATE EMERGENCY RESPONSE TEAM HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

7. EVACUATION PLAN

- 7.1 WHEN EMERGENCY SITUATION DEVELOPES, FACILITY PERSONNEL SHOULD ACTIVATE NEAREST ALARM STATION, CONTACT NEAREST SUPERVISOR AND CONTACT ROCKWELL'S SECURITY (EXT. 2097) IMMEDIATELY.
- 7.2 ROCKWELL'S SAFETY/SECURITY MANAGERS WILL ASSESS THE EXTENT OF THE EMERGENCY AND WILL INITIATE EVACUATION PROCEDURES BY USE OF THE PUBLIC ADDRESS SYSTEM.
- 7.3 WORKING AREAS WILL THEN EVACUATE THE FACILITY IN AN ORDERLY AND TIMELY FASHION AND LOCATE IN A PRE-DETERMINED LOCATION AS ASSIGNED AND POSTED IN WORK AREAS.
- 7.4 WHEN THE EMERGENCY SITUATION REQUIRES LOCAL AUTHORITIES TO CONTROL THE SITUATION, FACILITY PERSONNEL WILL RECEIVE DIRECTIONS FROM THE RESPONSIBLE PARTY IN CHARGE.

8. REQUIRED REPORTS

8.1 VERBAL REPORTS:

THE EMERGENCY COORDINATOR WILL NOTIFY EPA, STATE OF NORTH CAROLINA, AND ALL LOCAL AUTHORITIES OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN.

8.2 WRITTEN REPORTS

THE EMERGENCY COORDINATOR WILL NOTE IN THE OPERATING RECORD THE TIME, DATE AND DETAILS OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN AND WILL SUBMIT A WRITTEN REPORT ON THE EPA REGIONAL ADMINISTRATOR IN ACCORDANCE WITH 40 CFR 265.56 (J).

8.3 CONTINGENCY PLAN REVISION REPORTS:

8.3-1

AFTER EACH ACCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN, THE EMERGENCY COORDINATOR WILL REVISE THIS CONTINGENCY PLAN IN ACCORDANCE WITH THE EXPERIENCE ACQUIRED DURING EACH EMERGENCY SITUATION AND WILL SEND COPIES OF THE REVISIONS TO EACH HOLDER OF THE ORIGINAL CONTINGENCY PLAN.

8.3-2

THE EMERGENCY COORDINATOR WILL REVISE THIS CONTINGENCY PLAN IN THE EVENT OF ANY CHANGES IN INFORMATION CONTAINED WITHIN THE ORIGINAL CONTINGENCY PLAN AND WILL SEND COPIES OF THE REVISIONS TO EACH HOLDER OF THE ORIGINAL CONTINGENCY PLAN.

MF
HWMFCP

On-Highway Axle Division
Rockwell International Corporation
1000 Rockwell Drive
Fletcher, North Carolina 28732



June 29, 1984

Mr. J. W. Moore, Jr.
Department of Human Resources
Western Regional Office
Building #3
Black Mountain, North Carolina 28711

Dear Mr. Moore:

Enclosed is our revised Hazardous Waste Management Facility Contingency Plan for the Rockwell International Plant located in Fletcher, North Carolina. This Contingency Plan is for the Rockwell International Plant to be in compliance with the North Carolina Hazardous Waste Management Rules as established by the Department of Human Resources.

Please distribute copies to all concerned departments within your organization.

Thank you for your cooperation concerning this matter. If questions or other comments should develop, contact me at (704) 687-2024 for clarification.

Sincerely,

John Frazier /cc
John Frazier
Facilities Engineer

JF/lc

Attachment

cc: S. Ellis

ROCKWELL INTERNATIONAL
ASHEVILLE PLANT
FLETCHER, NORTH CAROLINA

HAZARDOUS WASTE MANAGEMENT FACILITY
CONTINGENCY PLAN

THIS CONTINGENCY PLAN IS SUBMITTED IN COMPLIANCE WITH 40 CFR 265.

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3. IMPLEMENTATION OF THE CONTINGENCY PLAN
4. EMERGENCY RESPONSE PROCEDURES
5. EMERGENCY EQUIPMENT
6. COORDINATION AGREEMENTS
7. EVACUATION PLAN
8. REQUIRED REPORTS

DRAWINGS

SITE PLAN

EVACUATION PLAN

6-29-84 REVISION C

1. GENERAL INFORMATION

1.1 NAME: ROCKWELL INTERNATIONAL
ASHEVILLE PLANT

1.2 LOCATION: 1000 ROCKWELL DRIVE
FLETCHER, NORTH CAROLINA 28732

1.3 CONTACT: STEVE ELLIS
PLANT ENGINEERING MANAGER
TELEPHONE: (704) 687-2016 (OFFICE)
(704) 891-8692 (HOME)

1.4 TYPE OF FACILITY HAZARDOUS WASTE
GENERATING FACILITY DUE TO
MANUFACTURING OF TRUCK AXLES.

2. EMERGENCY COORDINATORS

2.1 COORDINATORS

STEVE ELLIS
PLANT ENGINEERING MANAGER
TELEPHONE: (704) 687-2016 (OFFICE)
(704) 891-8692 (HOME)

BOB HARDIN
SAFETY/SECURITY MANAGER
TELEPHONE: (704) 687-2104 (OFFICE)
(704) 692-8656 (HOME)

BOB MILES
MAINTENANCE MANAGER
TELEPHONE: (704) 687-2084 (OFFICE)
(704) 891-9636 (HOME)

JOHN FRAZIER
FACILITIES ENGINEER
TELEPHONE: (704) 687-2024 (OFFICE)
(704) 258-9304 (HOME)

2.2 FUNCTION: EMERGENCY COORDINATOR WILL MAKE SURE
THAT THE CAUSE OF THE EMERGENCY HAS
BEEN ELIMINATED AND THAT CLEAN-UP AND
RESTORATION HAVE PROGRESSED AT LEAST
TO THE POINT OF NOT JEOPARDIZING
THE HEALTH AND SAFETY OF THE ROCKWELL
EMPLOYEES, AND THAT EPA, STATE OF
NORTH CAROLINA, AND ALL LOCAL AUTHORITIES
HAVE BEEN NOTIFIED, BEFORE PERMITTING
RESUMPTION OF THE OPERATIONS AFFECTED
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3. IMPLEMENTATION OF THE CONTINGENCY PLAN

- 3.1 IN THE EVENT OF AN EMERGENCY SITUATION WITHIN THE CONFINES OF ROCKWELL'S PROPERTY THAT REQUIRES THE NOTIFICATION OF THE DESIGNATED EMERGENCY COORDINATORS AND/OR LOCAL EMERGENCY PERSONNEL THIS CONTINGENCY PLAN WILL BE USED FOR CONTROL OF THE EMERGENCY SITUATION.
- 3.2 THE PRIMARY AND/OR COORDINATORS WILL HAVE THE RESPONSIBILITY OF DOCUMENTING ALL EMERGENCY SITUATIONS AS TO THEIR OCCURRENCE WITHIN THE CONFINES OF ROCKWELL'S PROPERTY.

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THE EMERGENCY COORDINATOR WILL NOTIFY BY PHONE, EPA, STATE OF NORTH CAROLINA, AND ALL LOCAL AUTHORITIES AS REQUIRED OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN.

4.2 CONTROL AND CONTAINMENT:

THE EMERGENCY COORDINATOR WILL IMPLEMENT THE BEST MEANS OF CONTROL AND CONTAINMENT OF ANY EMERGENCY SITUATION THAT DEVELOPS ON THE ROCKWELL PROPERTY.

4.3 FOLLOW-UP:

4.3.1

THE EMERGENCY COORDINATOR WILL MAKE SURE THAT THE CAUSE OF THE EMERGENCY HAS BEEN ELIMINATED AND THAT CLEAN-UP AND RESTORATION HAVE PROGRESSED AT LEAST TO THE POINT OF NOT JEOPARDIZING THE HEALTH AND SAFETY OF THE ROCKWELL'S EMPLOYEES AND THAT EPA, STATE OF NORTH CAROLINA AND ALL LOCAL AUTHORITIES HAVE BEEN NOTIFIED, BEFORE PERMITTING RESUMPTION OF THE OPERATIONS AFFECTED BY THE EMERGENCY.

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6. COORDINATION AGREEMENTS

6.1 HENDERSON COUNTY SHERIFF'S DEPARTMENT - (704) 692-2511.

6.1-1 THE HENDERSON COUNTY SHERIFF'S DEPARTMENT HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

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6.2-1 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

6.2-2 THE FLETCHER VOLUNTEER FIRE DEPARTMENT WILL TOUR AND INSPECT THE FACILITY TWICE A YEAR AND REPORT TO THE EMERGENCY COORDINATOR ANY POTENTIAL EMERGENCY PROBLEMS.

6.2-3 THE FLETCHER VOLUNTEER FIRE DEPARTMENT HAS IDENTIFIED SOURCES OF ADDITIONAL SUPPORT FOR EMERGENCIES BEYOND ITS OWN CAPABILITIES.

6.3 MARGARET PARDEF MEMORIAL HOSPITAL - (704) 693-6522

6.3-1 THE MARGARET PARDEF MEMORIAL HOSPITAL HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

6.4 MEMORIAL MISSION HOSPITAL - (704) 255-4000.

6.4-1 THE MEMORIAL MISSION HOSPITAL HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

6.5 STATE EMERGENCY RESPONSE TEAM - (704) 258-6152

6.5-1 THE STATE EMERGENCY RESPONSE TEAM HAS RECEIVED A COPY OF THE CONTINGENCY PLAN.

7. EVACUATION PLAN

7.1 WHEN EMERGENCY SITUATION DEVELOPES, FACILITY PERSONNEL SHOULD ACTIVATE NEAREST ALARM STATION, CONTACT NEAREST SUPERVISOR AND CONTACT ROCKWELL'S SECURITY (EXT. 2097) IMMEDIATELY.

7.2 ROCKWELL'S SAFETY/SECURITY MANAGERS WILL ASSESS THE EXTENT OF THE EMERGENCY AND WILL INITIATE EVACUATION PROCEDURES BY USE OF THE PUBLIC ADDRESS SYSTEM.

7.3 WORKING AREAS WILL THEN EVACUATE THE FACILITY IN AN ORDERLY AND TIMELY FASHION AND LOCATE IN A PRE-DETERMINED LOCATION AS ASSIGNED AND POSTED IN WORK AREAS.

7.4 WHEN THE EMERGENCY SITUATION REQUIRES LOCAL AUTHORITIES TO CONTROL THE SITUATION, FACILITY PERSONNEL WILL RECEIVE DIRECTIONS FROM THE RESPONSIBLE PARTY IN CHARGE.

8. REQUIRED REPORTS

8.1 VERBAL REPORTS:

THE EMERGENCY COORDINATOR WILL NOTIFY EPA, STATE OF NORTH CAROLINA, AND ALL LOCAL AUTHORITIES OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN.

8.2 WRITTEN REPORTS

THE EMERGENCY COORDINATOR WILL NOTE IN THE OPERATING RECORD THE TIME, DATE AND DETAILS OF ANY INCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN AND WILL SUBMIT A WRITTEN REPORT ON THE EPA REGIONAL ADMINISTRATOR IN ACCORDANCE WITH 40 CFR 265.56 (J).

8.3 CONTINGENCY PLAN REVISION REPORTS:

8.3-1

AFTER EACH ACCIDENT THAT REQUIRES IMPLEMENTATION OF THE CONTINGENCY PLAN, THE EMERGENCY COORDINATOR WILL REVISE THIS CONTINGENCY PLAN IN ACCORDANCE WITH THE EXPERIENCE ACQUIRED DURING EACH EMERGENCY SITUATION AND WILL SEND COPIES OF THE REVISIONS TO EACH HOLDER OF THE ORIGINAL CONTINGENCY PLAN.

8.3-2

THE EMERGENCY COORDINATOR WILL REVISE THIS CONTINGENCY PLAN IN THE EVENT OF ANY CHANGES IN INFORMATION CONTAINED WITHIN THE ORIGINAL CONTINGENCY PLAN AND WILL SEND COPIES OF THE REVISIONS TO EACH HOLDER OF THE ORIGINAL CONTINGENCY PLAN.

MF
HWMFCP



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

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

December 1, 1983

John Frazier
Rockwell International Corp.
1000 Rockwell Dr.
Fletcher, NC 28732
EPA NUMBER: NCD057174658

Dear Mr. Frazier:

The United States Environmental Protection Agency has granted the State of North Carolina 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.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 10/29/83 by Mr. J. W. Moore Jr., Solid and Hazardous Waste Management Branch. The inspection revealed compliance with the regulations. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,


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

copy: J. W. Moore Jr.



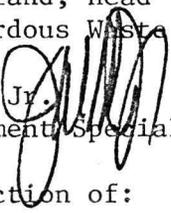
Copy

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

November 14, 1983

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

FROM: J. W. Moore, Jr. 
Waste Management Specialist

RE: RCRA Reinspection of:

Rockwell International Corporation
1000 Rockwell Drive
Fletcher, NC 28732
Henderson County
EPA ID #NCD057174658
Contact: John Frazier

Information from the above-noted facility was received on October 29, 1983 and the plant was found to be in compliance with State Hazardous Waste Management Rules.

JWM/dgh



Truck Axle Division
Rockwell International Corporation
Box 928
Fletcher, North Carolina 28732



Rockwell
International

October 28, 1983

Mr. J. W. Moore, Jr.
Department of Human Resources
Western Regional Office
Building #3
Black Mountain, North Carolina 28711

Dear Mr. Moore:

Our first in-house personnel training for Hazardous Waste Management has been completed. The training was conducted in accordance with our requirements to meet 265.16-Personnel Training of the North Carolina Hazardous Waste Management Rules.

The course outline consisted of the following subjects:

1. Environmental Protection Agency
2. Resource Conservation and Recovery Act (RCRA)
3. Wastes
 - a. solid
 - b. hazardous
4. Treatment
5. Disposal
6. Hazardous Waste
 - a. categories
 - b. definitions
 - c. testing
 - d. listing
 - e. identifying
7. EPA Identification Numbers
 - a. categories
 - b. requirements
8. Manifests
 - a. requirements
 - b. documents
 - c. record keeping and reporting
 - d. labelling and identification

October 28, 1983

Page Two

9. Personnel Training
10. Record Keeping
11. Rockwell International Contingency Plan
 - a. emergency coordinators
 - b. emergency response procedures
 - c. emergency equipment
 - d. evacuation plan
 - e. reporting
12. Local authorities and Emergency Care
13. Open discussion

This format, plus involvement by members of the class, will be used in all future training sessions. If you can suggest any additional topic areas for our training, please inform me during your next inspection visit.

Sincerely,



John Frazier
Facilities Engineer

JF/lc

cc: P. Mace
J. Bukoski
B. Hardin

Truck Axle Division
Rockwell International Corporation
Box 928
Fletcher, North Carolina 28732



Rockwell
International

October 19, 1983

Mr. J. W. Moore, Jr.
Department of Human Resources
Western Regional Office
Building #3
Black Mountain, North Carolina 28711

Dear Mr. Moore:

Enclosed is our Hazardous Waste Management Facility Contingency Plan for the Rockwell International Plant located in Fletcher, North Carolina. This Contingency Plan is for the Rockwell International Plant to be in compliance with the North Carolina Hazardous Waste Management Rules as established by the Department of Human Resources.

Please distribute copies to all concerned departments within your organization. If the need for a revision should arise, Rockwell International will provide your office with the most current revision on file at our facility.

Thank you for your cooperation concerning this matter. If questions or other comments should develop, contact me at (704) 687-2024 for clarification.

Sincerely,

John Frazier
Facilities Engineer

JF/lc

Attachment

cc: R. Martello
P. Mace
S. Wells
J. Bukoski
B. Hardin
R. Miles

ROCKWELL INTERNATIONAL
ASHEVILLE PLANT
FLETCHER, NORTH CAROLINA

HAZARDOUS WASTE MANAGEMENT FACILITY
CONTINGENCY PLAN

This Contingency Plan is submitted in compliance with 40 CFR 265.

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3. IMPLEMENTATION OF THE CONTINGENCY PLAN
4. EMERGENCY RESPONSE PROCEDURES
5. EMERGENCY EQUIPMENT
6. COORDINATION AGREEMENTS
7. EVACUATION PLAN
8. REQUIRED REPORTS

DRAWINGS

SITE PLAN

EVACUATION PLAN

1. GENERAL INFORMATION

- 1.1 Name: Rockwell International
Asheville Plant
- 1.2 Location: 1000 Rockwell Drive
Fletcher, North Carolina 28732
- 1.3 Contact: Jerry J. Bukoski, P. E.
Plant Engineer
Telephone: (704) 687-2016 (office)
(704) 684-1170 (home)
- 1.4 Type of Facility: Hazardous Waste
Generating facility due to
manufacturing of truck axles.

2. EMERGENCY COORDINATORS

- 2.1 Coordinators: Jerry J. Bukoski, P. E.
Plant Engineer
Telephone: (704) 687-2016 (office)
(704) 684-1170 (home)

Bob Hardin
Safety/Security Manager
Telephone: (704) 687-2104 (office)
(704) 692-8656 (home)

Bob Miles
Maintenance Manager
Telephone: (704) 687-2084 (office)
(704) 891-9636 (home)

John Frazier
Facilities Engineer
Telephone: (704) 687-2024 (office)
(704) 258-9304 (home)

- 2.2 Function: Emergency coordinator will make sure that the cause of the emergency has been eliminated and that clean-up and restoration have progressed at least to the point of not jeopardizing the health and safety of the Rockwell employees, and that EPA, State of North Carolina, and all local authorities have been notified, before permitting resumption of the operations affected by the emergency.

3. IMPLEMENTATION OF THE CONTINGENCY PLAN

- 3.1 In the event of an emergency situation within the confines of Rockwell's property that requires the notification of the designated emergency coordinators and/or local emergency personnel this contingency plan will be used for control of the emergency situation.
- 3.2 The primary and/or coordinators will have the responsibility of documenting all emergency situations as to their occurrence within the confines of Rockwell's property.

4. EMERGENCY RESPONSE PROCEDURES

- 4.1 Notification: The emergency coordinator will notify by phone, EPA, State of North Carolina, and all local authorities as required of any incident that requires implementation of the contingency plan.
- 4.2 Control and Containment: The emergency coordinator will implement the best means of control and containment of any emergency situation that develops on the Rockwell property.
- 4.3 Follow-Up:
 - 4.3.1 The emergency coordinator will make sure that the cause of the emergency has been eliminated and that clean-up and restoration have progressed at least to the point of not jeopardizing the health and safety of the Rockwell's employees and that EPA, State of North Carolina and all local authorities have been notified, before permitting resumption of the operations affected by the emergency.
 - 4.3.2 The emergency coordinator will note in the operating record the time, date and details of an incident that requires implementation of this contingency plan and will submit a written report on the incident to the EPA Regional Administrator in accordance with 40 CFR 265.67 (j).

5. EMERGENCY EQUIPMENT

- 5.1 Each working area in the facility is equipped with fire extinguishers to extinguish small equipment and/or facility fires.
- 5.2 The facility is equipped with fire hydrants and equipment cabinets containing hoses, nozzles and special equipment for fighting fires and to permit washing down of small spills.
- 5.3 The chip building contains a supply of absorbent material, shovels and other clean-up equipment.
- 5.4 The facility contains a first-aid station that is maintained and stocked with medical supplies for initial treatment of emergency incidents or facility accidents.
- 5.5 The first-aid station is equipped with a mobile stretcher for transporting victims to the first-aid station.
- 5.6 The facility is equipped with a mobile fire cart for assisting in emergency situations within the confines of the company property.
- 5.7 The facility is equipped with breathing apparatus (e.g., Scott Air Packs) located in the first-aid station, on the mobile fire cart and in the chip building.
- 5.8 The facility is equipped with an alarm system that can be activated from and is audible in each working area.
- 5.9 The facility is equipped with a public address system that can be activated from and is audible in each working area by use of the telephone system.
- 5.10 The telephone numbers of the principal and alternate emergency coordinators, the Henderson County Sheriff's Department, Fletcher Volunteer Fire Department, Margaret Pardee Memorial Hospital, Memorial Mission Hospital and State emergency response team are displayed prominently in all Rockwell Security Offices and all telephones in and around the hazardous waste containment location.
- 5.11 The Fletcher Volunteer Fire Department has adequate fire-fighting equipment and can call on additional fire-fighting equipment as required from neighboring fire departments.
- 5.12 Ambulance service to Margaret Pardee Memorial Hospital and Memorial Mission Hospital is available in the event of injuries

6. COORDINATION AGREEMENTS

6.1 Henderson County Sheriff's Department - (704) 692-2511.

6.1-1 The Henderson County Sheriff's Department has received a copy of the Contingency Plan.

6.2 Fletcher Volunteer Fire Department - (704) 692-3233.

6.2-1 The Fletcher Volunteer Fire Department has received a copy of the Contingency Plan.

6.2-2 The Fletcher Volunteer Fire Department will tour and inspect the facility twice a year and report to the Emergency Coordinator any potential emergency problems.

6.2-3 The Fletcher Volunteer Fire Department has identified sources of additional support for emergencies beyond its own capabilities.

6.3 Margaret Pardee Memorial Hospital - (704) 693-6522

6.3-1 The Margaret Pardee Memorial Hospital has received a copy of the Contingency Plan.

6.4 Memorial Mission Hospital - (704) 255-4000.

6.4-1 The Memorial Mission Hospital has received a copy of the Contingency Plan.

6.5 State Emergency Response Team - (704) 258-6152

6.5-1 The State Emergency Response Team has received a copy of the Contingency Plan.

7. EVACUATION PLAN

7.1 When emergency situation develops, facility personnel should activate nearest alarm station, contact nearest supervisor and contact Rockwell's Security (Ext. 2097) immediately.

7.2 Rockwell's Safety/Security Managers will assess the extent of the emergency and will initiate evacuation procedures by use of the public address system.

7.3 Working areas will then evacuate the facility in an orderly and timely fashion and locate in a pre-determined location as assigned and posted in work areas.

7.4 When the emergency situation requires local authorities to control the situation, facility personnel will receive directions from the responsible party in charge.

8. REQUIRED REPORTS

8.1 Verbal Reports:

The emergency coordinator will notify EPA, State of North Carolina, and all local authorities of any incident that requires implementation of the Contingency Plan.

8.2 Written Reports

The emergency coordinator will note in the operating record the time, date and details of any incident that requires implementation of the Contingency Plan and will submit a written report on the EPA Regional Administrator in accordance with 40 CFR 265.56 (j).

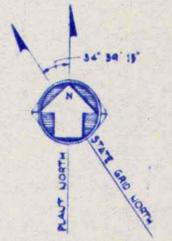
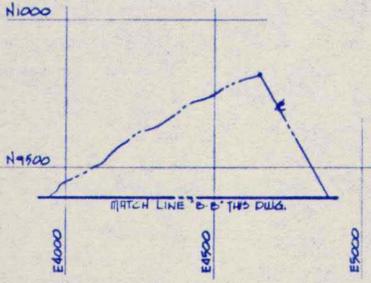
8.3 Contingency Plan
Revision Reports:

8.3-1

After each accident that requires implementation of the Contingency Plan, the Emergency Coordinator will revise this Contingency Plan in accordance with the experience acquired during each emergency situation and will send copies of the revisions to each holder of the original Contingency Plan.

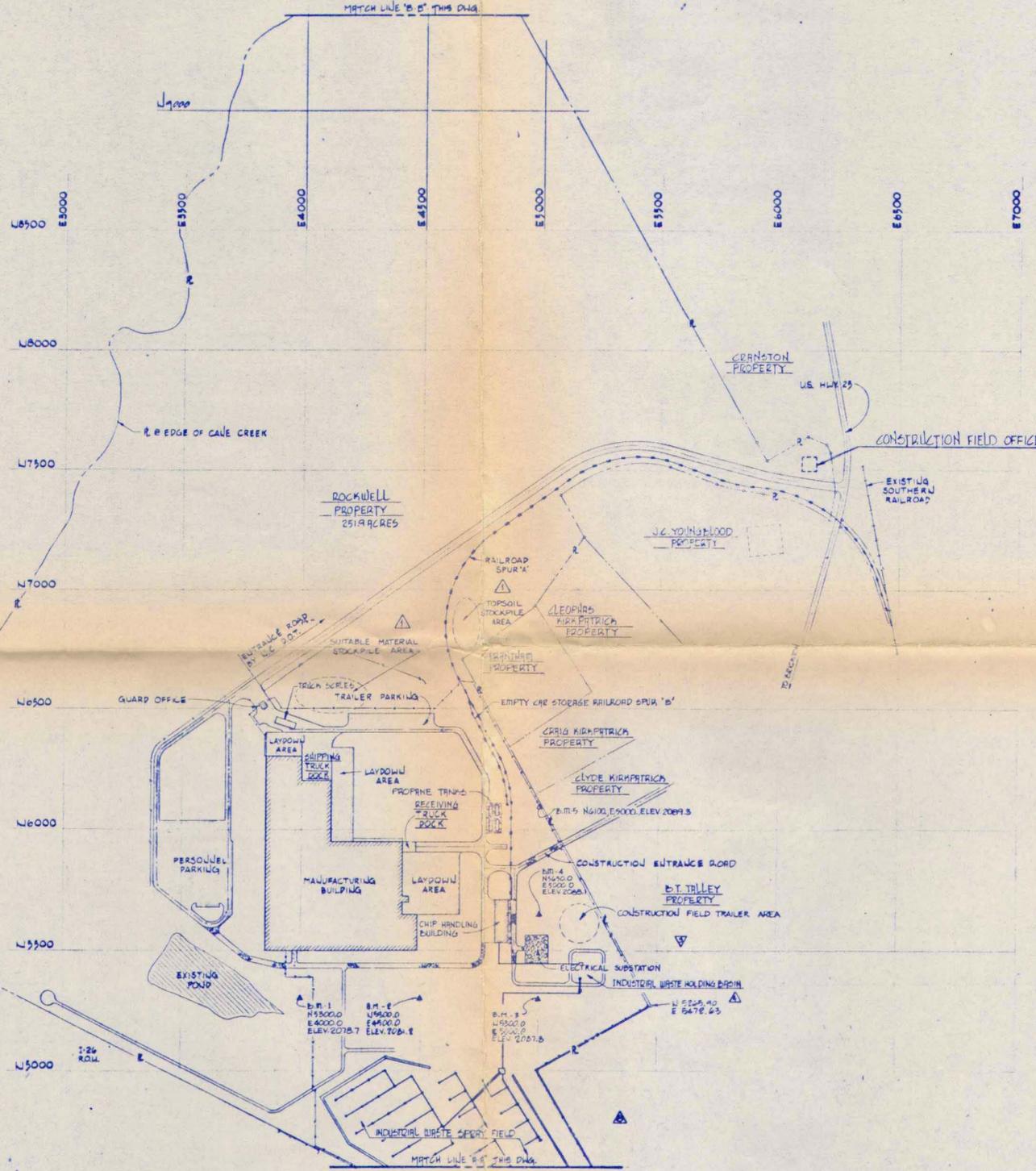
8.3-2

The Emergency Coordinator will revise this Contingency Plan in the event of any changes in information contained within the original Contingency Plan and will send copies of the revisions to each holder of the original Contingency Plan.



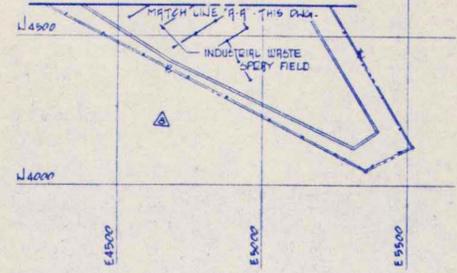
GENERAL NOTES

1. EXISTING BOUNDARY AND TOPOGRAPHICAL INFORMATION SHOWN WERE TAKEN FROM SURVEYS BY LIGHTS BRYCE AND ASSOC., STATION BUILDING, HENDERSONVILLE, N.C.; ADDITIONAL TOPOGRAPHICAL INFORMATION SHOWN WERE TAKEN FROM AN AERIAL TOPOGRAPHY SURVEY DATED 4-19-79 BY LANDTRAM ENGINEERING CO., INC., F.O. BOX 668, CARY, N.C.
2. COORDINATES ARE BASED ON ROCKWELL'S PLANT GRID SYSTEM.
3. CONTOURS AND ELEVATIONS ARE FINISHED GRADES FOR THE ROUGH GRADING CONTRACT ELEVATIONS DEDUCT:
 - 12.0 INCHES FOR HEAVY ASPHALTIC CONCRETE PAVED AREAS
 - 8.0 INCHES FOR LIGHT ASPHALTIC CONCRETE PAVED AREAS
 - 4.0 INCHES FOR GRAVEL PAVED AREAS (FUTURE GRASSING AREAS INCLUDED)
 - 0.0 INCHES FOR GRAVEL ROADS
 - 0.0 INCHES FOR RAILROAD SUBGRADES
 - 14.0 INCHES FOR HEAVY CONCRETE PAVED AREAS
 - 12.0 INCHES FOR LAYDOWN CONCRETE PAVED AREAS
4. ELEVATIONS ON THE RAILROAD ARE SUBGRADE ELEVATIONS.
5. EXISTING AND PROPOSED CONTOUR INTERVAL IS TWO (2) FEET UNLESS NOTED OTHERWISE.
6. RIPRAP WHERE DESIGNATED ON THE PLANS SHALL BE HAND PLACED OR UNIFORMLY DUMPED IN A TWELVE (12) INCH (MIN) THICK LAYER. MATERIALS SHALL CONFORM TO SECTION 942 CURB 1 OF THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION STANDARD SPECIFICATIONS 1988 EDITION.
7. ADD 3000 FEET TO PLAN ELEVATIONS TO OBTAIN ACTUAL ELEVATIONS.
8. CONSTRUCTION OF PAVEMENTS OR RAILROADS IS NOT PART OF THIS CONTRACT EXCEPT FOR THEIR SUBGRADES.
9. ALL CORRUGATED METAL PIPE (CULVERTS) AND PIPE ARCHES SHALL MEET REQUIREMENTS OF AASHTO M-198 AND HAVE HUGGER BANDS OR APFD EQUAL.
10. NOTES 1-9 WERE USED FOR PREVIOUS CONTRACTS AND SHOULD BE REFERENCED FOR INFORMATION IN PERFORMANCE OF THE GENERAL CONTRACT.
11. ALL DISTURBED AREAS WITHIN THE GENERAL CONTRACT LIMITS NOT OCCUPIED BY STRUCTURES MUST BE GRASSED.
12. THE CONTRACTOR WILL BE RESPONSIBLE FOR PROVISIONS MEASURED FOR DUST CONTROL AS REQUIRED BY ROCKWELL DURING EARTHMOVING OPERATIONS.
13. CONSTRUCTION OF ALL PAVEMENTS AND RAILROADS ON AN EXISTING SUBGRADE IS PART OF THE GENERAL CONTRACT.
14. FINISHED GRADING OF ALL AREAS WITHIN THE LIMITS OF WORK IS PART OF THE GENERAL CONTRACT.
15. RIPRAP ON ALL EROSION CONTROL DEVICES IS TO BE REMOVED AND THE SILLATION PIT FILLER TO BE REPLACED WITH A BRAT ITEM OF WORK. PLACE EXISTING RIPRAP AS SHOWN ON DRAWING C-102 ON THE DOWN-STREAM END OF THE POND SPILLWAY.
16. BACKFILL AROUND EXISTING FOOTINGS IN BUILDING AREA.
17. NOTES 1-16 WERE USED FOR PREVIOUS CONTRACTS AND SHOULD BE REFERENCED FOR INFORMATION IN PERFORMANCE OF THE WASTE TREATMENT SYSTEM CONTRACT.
18. ALL EARTHWORK FOR THE WASTE TREATMENT SYSTEM CONTRACT IS PART OF THE GENERAL CONTRACT EXCEPT THAT NECESSARY TO INSTALL THE INDUSTRIAL WASTE SYSTEM STRUCTURES AND PIPING SHOWN ON THE DRAWINGS. EXCEPTION TO THIS IS THE FINISH GRADING REQUIREMENTS DEFINED IN THE SPECIFICATIONS. ALL OTHER ITEMS OF WORK NOT SPECIFIED AS PART OF THE INDUSTRIAL WASTE CONTRACT WILL BE PART OF THE GENERAL CONTRACT.



LEGEND

| | EXIST. | NEW |
|-------------------------------|--------|----------|
| INDUSTRIAL WASTE | | -IW- |
| CONTOUR | -70- | -6.8- |
| SPOT ELEVATION | + 51.5 | + (73.2) |
| BUILDING | | |
| ASPHALT PAVEMENT | | |
| CONCRETE STRUCTURE | | |
| GRAVEL | | |
| CONCRETE CURB | | |
| CATCH BASIN | | |
| MANHOLE | | |
| RAILROAD | | |
| SECURITY FENCE | | |
| EROSION CONTROL MAT | | |
| STORM DRAIN | | |
| CONCRETE HEADWALL | | |
| SOIL BORING | | |
| BENCHMARK | | |
| WATER LINE | | |
| GRASSING LIMITS | | |
| WATER SURFACE | | |
| CLEANOUT | | |
| SANITARY SEWER | | |
| FIRE PROTECTION | | |
| POST DIVISION VALVE | | |
| POST INDICATOR VALVE | | |
| POLYVINYL CHLORIDE PIPE (PVC) | | |
| CAST IRON PIPE | | |
| DUCTILE IRON PIPE | | |
| FIRE HYDRANT | | |
| LIMITS OF WORK | | |
| 2 STRAND BRIDGED WIRE FENCE | | |



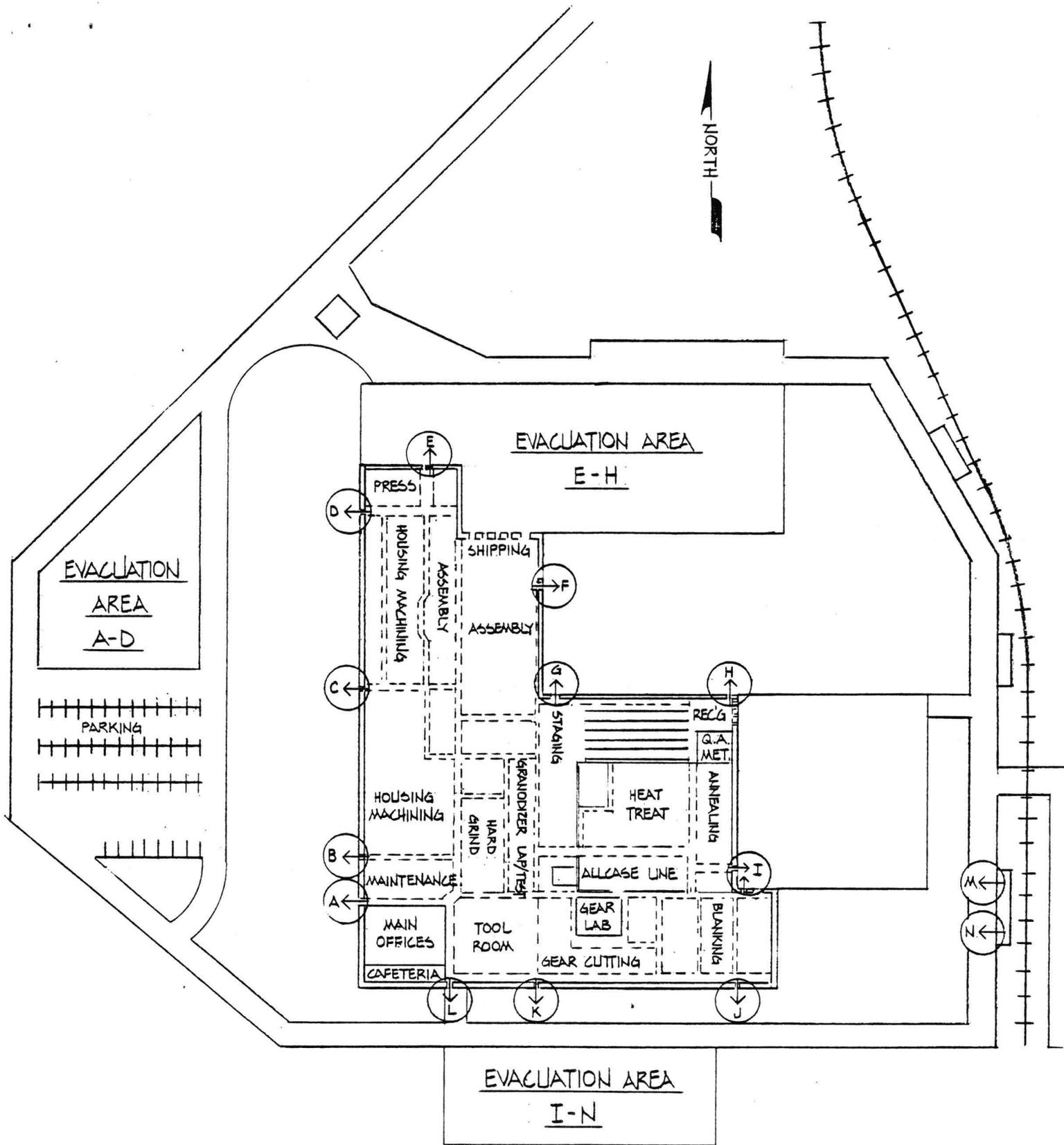
| NO. | DATE | REVISION | BY | CHK. | APP. |
|-----|------|---|----|------|------|
| 1 | | ISSUED FOR CONST. M.P.S. | | | |
| 2 | | ISSUED FOR BIDS | | | |
| 3 | | APPROVED WASTE TREATMENT SYSTEM | | | |
| 4 | | ISSUED FOR CONST. | | | |
| 5 | | ADDED NOTE | | | |
| 6 | | ISSUED FOR GEN. CONST. CONTRACT | | | |
| 7 | | ISSUED FOR WASTE TREATMENT SYSTEM | | | |
| 8 | | ISSUED FOR CONSTRUCTION ADDED TISSUE AREA | | | |
| 9 | | ADDED TO LEGEND, ISSUED FOR BIDDING | | | |
| 10 | | FINAL REVISIONS | | | |
| 11 | | ISSUED AS NOTED 2.000' STOKPILE AREAS | | | |
| 12 | | ISSUED FOR BIDS | | | |

| | |
|--------------|--|
| Drawn by | |
| Dept. Ch. | |
| Dept. Insp. | |
| Coord. Ch. | |
| P.E. Insp. | |
| Client Insp. | |

ATLANTA DALLAS NEW YORK
LOCKWOOD GREENE
 ARCHITECTS - ENGINEERS
 SPARTANBURG, S.C.

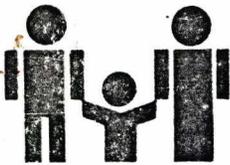
| | |
|-----------|--|
| Sheet No. | 00082 05 |
| Scale | 1" = 200' |
| Job Name | ROCKWELL INTERNATIONAL REAR AISLE FACILITY FLETCHER, N. C. |

| | |
|------------|--|
| Job No. | 80082 05 |
| Scale | 1" = 200' |
| Job Name | ROCKWELL INTERNATIONAL REAR AISLE FACILITY FLETCHER, N. C. |
| Drawn by | |
| Checked by | |
| Date | |



EVACUATION ROUTE MAP

N.T.S.



Jim Moore

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

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

August 18, 1983

Mr. John Frazier
Rockwell International Corporation
1000 Rockwell Drive
Fletcher, NC 28732

RE: NCD057174658

Dear Mr. Frazier:

On July 28, 1983 Mr. Jim Moore of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. The following violations were noted:

1. Personnel Training Records (265.16) - This material was not available.
2. Arrangements with Local Authorities (265.37) - These arrangements were not made with all necessary parties.
3. Contingency Plan/Emergency Procedures (265.50-265.56) - None of this requirement had been satisfied.

A compliance date of November 1, 1983 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. Jim Moore





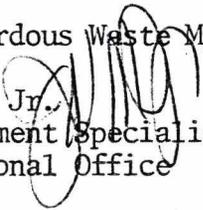
Copy

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

August 10, 1983

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

FROM: J. W. Moore, Jr. 
Waste Management Specialist
Western Regional Office

RE: RCRA Inspection:

Rockwell International Corp.
1000 Rockwell Drive
Fletcher, NC 28732
Henderson County
EPA ID #NCD057174658
Contact: John Frazier, Facilities Engineer

The following violations of RCRA for Rockwell International Corp. were identified during an inspection of July 28, 1983:

1. Personnel Training Records(265.16) - This material was not available.
2. Arrangements with Local Authorities(265.37) - These arrangements were not made with all necessary parties.
3. Contingency Plan/Emergency Procedures(265.50-265.56) - None of this requirement had been satisfied.

The following compliance schedule was agreed upon by John Frazier and J. W. Moore, Jr.:

Correct all violations by November 1, 1983.

JWM/dgh

RCRA INSPECTION FORM

Rockwell International Corp NC0057124158 Anderson
 Name of Site EPA I.D. County
Fletcher 7/28/83
 Location Inspection Date
7/1/83 [Signature]
 Compliance Date Signature of Inspector(s)
 Signature of Facility Contact

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)

| | C | NC | NA | Violation(s) |
|---|---|----|----|--------------|
| 1. GENERAL (.11-.12) | | | | |
| 2. MANIFEST/RECORDKEEPING (.20-.22) | | | | |
| 3. HAZARDOUS WASTE DISCHARGES (.30-.31) | | | | |

TSDF STANDARDS (265.00)

| | C | NC | NA | Violation(s) |
|--|---|----|----|-----------------|
| 1. GENERAL (.1-.4) | | | ✓ | |
| 2. GENERAL FACILITY STANDARDS (.10-.17) | | ✓ | | 265.16 |
| 3. PREPAREDNESS AND PREVENTION (.30-.37) | | ✓ | | 265.37 |
| 4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES (.50-.56) | | ✓ | | 265.50 - 265.56 |
| 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 REPORT

FACILITY INFORMATION

Rockwell International Corp.
1000 Rockwell Drive
Fletcher, NC 28732
Henderson County
EPA ID #NCD057174658

FACILITY CONTACT

John Frazier, Facilities Engineer
Jerry Bukoski, Plant Engineer

SURVEY PARTICIPANTS

J. W. Moore, Jr.
John Frazier
Jerry Bukoski

DATE OF INSPECTION

July 28, 1983

PURPOSE OF SURVEY

RCRA compliance inspection was conducted at Rockwell by the N. C. Solid & Hazardous Waste Management Branch. The inspection included interviews, site survey and record review.

FACILITY DESCRIPTION

Rockwell produces tandem truck axels. They have generated no waste since beginning operations in February, 1983. They anticipate a paint sludge which may contain xylene (F003) - approximately 25-50 gal/month. They may have a methanol overflow - approximately 50 gal/year. A manganese phosphating process sludge is expected in quantities of 1000-2000 gal/year. They have an NRCD issued Air Permit #4902R. They have an NRCD issued discharge permit #7049 and an NRCD issued NPDES permit #NC0050474.

DOCUMENTATION OF SITE DEFICIENCIES

265.16
265.37
265.50-265.56

Specific reference is made to the above-noted violations in a memorandum to Mr. O. W. Strickland.

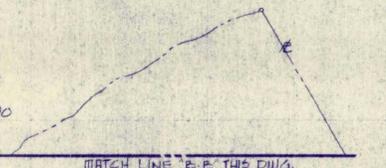
COMPLIANCE SCHEDULE

The following compliance schedule was agreed upon by John Frazier and J. W. Moore, Jr.:

All violations to be corrected by November 1, 1983.

N1000

N9500



GENERAL NOTES

- EXISTING BOUNDARY AND TOPOGRAPHICAL INFORMATION SHOWN WERE TAKEN FROM SURVEYS BY LAUGHTER, BAYRE AND BEGG, STATION 2411 (DINO HENDERSONVILLE, N.C.), ADDITIONAL TOPOGRAPHICAL INFORMATION SHOWN WERE TAKEN FROM AN AERIAL TOPOGRAPHY SURVEY DATED 4-19-79 BY LANDMARK ENGINEERING CO., INC. (P.O. BOX 668, CHRY, N.C.)
- COORDINATES ARE BASED ON ROCKWELL'S PLANT GRID SYSTEM.
- CONTOURS AND ELEVATIONS ARE FINISHED GRADES FOR THE BENCH GRADING CONTRACT ELEVATIONS DEDUCT:
 - 12.0 INCHES FOR HEAVY ASPHALTIC CONCRETE PAVED AREAS.
 - 8.0 INCHES FOR LIGHT ASPHALTIC CONCRETE PAVED AREAS.
 - 4.0 INCHES FOR GRAVEL ROADS (FUTURE ASPHALT AREAS INCLUDED).
 - 6.0 INCHES FOR GRAVEL ROADS.
 - 0.0 INCHES FOR RAILROAD SUEDEWAYS.
 - 14.0 INCHES FOR HEAVY CONCRETE PAVED AREAS.
 - 12.0 INCHES FOR LAYDOWN CONCRETE PAVED AREAS.
- ELEVATIONS ON THE RAILROAD ARE SUBGRADE ELEVATIONS.
- EXISTING AND PROPOSED CONTOUR INTERVAL IS TWO (2) FEET UNLESS NOTED OTHERWISE.
- RIPRAP WHERE DESIGNATED ON THE PLANS SHALL BE HAND PLACED OR UNIFORMITY DUMPED IN A TUBES (12) INCH (MIN) THICK LAYER. MATERIAL SHALL CONFORM TO SECTION 942 CLASS 1 OF THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION STANDARD SPECIFICATIONS 11TH EDITION.
- ADD 2000 FEET TO PLAN ELEVATIONS TO OBTAIN ACTUAL ELEVATIONS.
- COMPLETION OF PAVEMENTS OR RAILROADS IS NOT PART OF THIS CONTRACT EXCEPT FOR THEIR SUBGRADES.
- ALL CORRUGATED METAL PIPES (BOLLARD) AND PIPE ARCHES SHALL MEET REQUIREMENTS OF AASHTO M-199 AND HAVE HUGGER BANDS OR APRS EQUAL.
- NOTES 1-9 WERE USED FOR PREVIOUS CONTRACTS AND SHOULD BE REFERENCED FOR INFORMATION IN PERFORMANCE OF THE GENERAL CONTRACT.
- ALL DISTURBED AREAS WITHIN THE GENERAL CONTRACT LIMITS NOT OCCUPIED BY STRUCTURES MUST BE GRASSED.
- THE CONTRACTOR WILL BE RESPONSIBLE FOR PROVIDING MEASURES FOR DUST CONTROL AS REQUIRED BY ROCKWELL DURING EARTHWORK OPERATIONS.
- CONSTRUCTION OF ALL PAVEMENTS AND RAILROADS ON AN EXISTING SUBGRADE IS PART OF THE GENERAL CONTRACT.
- FINISHED GRADINGS OF ALL AREAS WITHIN THE LIMITS OF WORK IS PART OF THE GENERAL CONTRACT.
- RIPRAP ON ALL EROSION CONTROL DEVICES IS TO BE REMOVED AND THE SITUATION FILLED UP AS A LAST ITEM OF WORK. PLACE EXISTING RIPRAP AS SHOWN ON DRAWING C-182 ON THE DOWN-STREAM END OF THE POND SPILLWAY.
- BACKFILL AROUND EXISTING FOOTINGS IN BUILDING AREA.
- NOTES 1-6 WERE USED FOR PREVIOUS CONTRACTS AND SHOULD BE REFERENCED FOR INFORMATION IN PERFORMANCE OF THE WASTE TREATMENT SYSTEM CONTRACT.
- ALL EARTHWORK FOR THE WASTE TREATMENT SYSTEM CONTRACT IS PART OF THE GENERAL CONTRACT EXCEPT THAT NECESSARY TO INSTALL THE INDUSTRIAL WASTE SYSTEM STRUCTURES AND PIPING SHOWN ON THE DRAWINGS. EXCEPTION TO THIS IS THE FINISH GRADING REQUIREMENTS DEFINED IN THE SPECIFICATIONS. ALL OTHER ITEMS OF WORK NOT SPECIFIED AS PART OF THE INDUSTRIAL WASTE CONTRACT WILL BE PART OF THE GENERAL CONTRACT.

MATCH LINE 'B-B' THIS DWG.

N9000

E4000

E4500

E5000

E5500

E6000

E6500

E7000

E7500

E8000

E8500

E9000

E9500

E10000

E10500

E11000

E11500

E12000

E12500

E13000

E13500

E14000

E14500

E15000

E15500

E16000

E16500

E17000

E17500

E18000

E18500

E19000

E19500

E20000

E20500

E21000

E21500

E22000

E22500

E23000

E23500

E24000

E24500

R. & S. EDGE OF CANE CREEK

ROCKWELL PROPERTY 251.9 ACRES

CRANSTON PROPERTY

U.S. HWY. 25

CONSTRUCTION FIELD OFFICE

EXISTING SOUTHERN RAILROAD

J.C. YOUNG FLOOD PROPERTY

LEOPARD KIRKPATRICK PROPERTY

SUITABLE MATERIAL STOCKPILE AREA

RAILROAD SPUR 'A'

TOPSOIL STOCKPILE AREA

TRANTHAM PROPERTY

GUARD OFFICE

TRAILER PARKING

EMPTY CAR STORAGE RAILROAD SPUR 'B'

LAYDOWN AREA

SNIPPING TRUCK DOOR

LAYDOWN AREA

PROPANE TANKS

RECEIVING TRUCK DOOR

CRAG KIRKPATRICK PROPERTY

CLYDE KIRKPATRICK PROPERTY

B.M. 5 N6100, E9000, ELEV. 2089.3

CONSTRUCTION ENTRANCE ROAD

B.T. VALLEY PROPERTY

CONSTRUCTION FIELD TRAILER AREA

PERSONNEL PARKING

INSIDE GUARD HOUSE

MOBILE MANUFACTURING STRETCHER BUILDING

MOBILE FIRE TRUCK

FIRST AID

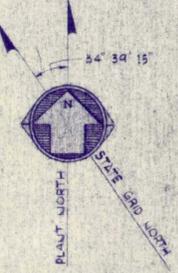
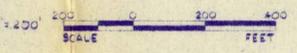
EXISTING POND

DRUM STORAGE AREA

INDUSTRIAL WASTE HOLDING BASIN

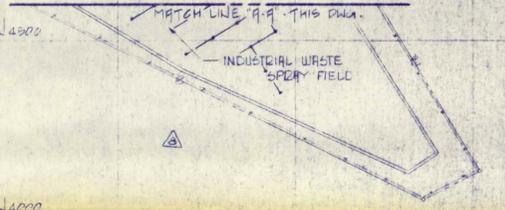
INDUSTRIAL WASTE SPRAY FIELD

MATCH LINE 'A-A' THIS DWG.



LEGEND

| | EXIST. | NEW |
|-----------------------------|-----------|-----------|
| INDUSTRIAL WASTE | --- | -IW- |
| CONTOUR | ---(8)--- | ---(8)--- |
| SPOT ELEVATION | + 81.5 | + (75.2) |
| BUILDING | [Symbol] | [Symbol] |
| ASPHALT PAVEMENT | [Symbol] | [Symbol] |
| CONCRETE STRUCTURE | [Symbol] | [Symbol] |
| GRAVEL | [Symbol] | [Symbol] |
| CONCRETE CURB | [Symbol] | [Symbol] |
| CATCH BASIN | [Symbol] | [Symbol] |
| MANHOLE | [Symbol] | [Symbol] |
| RAILROAD | [Symbol] | [Symbol] |
| SECURITY FENCE | [Symbol] | [Symbol] |
| EROSION CONTROL MAT | [Symbol] | [Symbol] |
| STORM DRAIN | [Symbol] | [Symbol] |
| CONCRETE HEADWALL | [Symbol] | [Symbol] |
| SOIL BORING | B 25 | [Symbol] |
| BEUCHMARK | [Symbol] | [Symbol] |
| WATER LINE | [Symbol] | [Symbol] |
| GRASSING LIMITS | [Symbol] | [Symbol] |
| WATER SURFACE | [Symbol] | [Symbol] |
| CLEANOUT | [Symbol] | [Symbol] |
| SANITARY SEWER | [Symbol] | [Symbol] |
| FIRE PROTECTION | [Symbol] | [Symbol] |
| POST DIVISION VALVE | [Symbol] | [Symbol] |
| POST INDICATOR VALVE | [Symbol] | [Symbol] |
| POLYVINYL CHLORIDE PIPE PVC | [Symbol] | [Symbol] |
| CAST IRON PIPE | [Symbol] | [Symbol] |
| DUCTILE IRON PIPE | [Symbol] | [Symbol] |
| FIRE HYDRANT | [Symbol] | [Symbol] |
| LIMITS OF WORK | [Symbol] | [Symbol] |
| 2 STRAND BARBED WIRE FENCE | [Symbol] | [Symbol] |



| NO. | DATE | REVISION | BY | CHK. | APPR. |
|-----|----------|--|----|------|-------|
| 10 | 10/18/88 | ISSUED FOR CONST. - WTS | | | |
| 9 | 10/18/88 | ISSUED FOR BLDG. WTS. | | | |
| 8 | 10/18/88 | ISSUED WASTE TREATMENT SYSTEM | | | |
| 7 | 10/18/88 | ISSUED FOR CONST. | | | |
| 6 | 10/18/88 | ADDED NOTE | | | |
| 5 | 10/18/88 | ISSUED FOR BLDG. GEN. CONCT. CONTRACT | | | |
| 4 | 10/18/88 | ADDED FOR INFORMATION - GEN. CONTRACT | | | |
| 3 | 10/18/88 | ISSUED FOR CONSTRUCTION/ADDED TRLR. AREA | | | |
| 2 | 10/18/88 | ADDED TO LEGEND ISSUED FOR BLDG. UTILITY | | | |
| 1 | 10/18/88 | PKG. - REVISED NOTES | | | |
| 1 | 10/18/88 | CHANGED AS NOTED/ADDED STOCKPILE AREAS | | | |
| 0 | 10/18/88 | ISSUED FOR BLDG. | | | |

drawn by *M.G.*
 dept. ck. *J.P. [unclear]*
 coord. ck. *P.L. [unclear]*
 p.m. appr. *M.L. [unclear]*
 client appr. *[unclear]*

ATLANTA DALLAS NEW YORK
LOCKWOOD GREENE
 ARCHITECTS - ENGINEERS
 SPARTANBURG, S.C.

sheet title
OVERALL SITE PLAN

job name
**ROCKWELL INTERNATIONAL
 REAR AXLE FACILITY
 FLETCHER, N. C.**

job no. 80082.05
 scale 1" = 200'
 date
 job no. C-101
 rev. no. 10
 date

OCT 27 1988
 10:10 AM
 10/27/88