

LASERFICHE FILE TRANSMITTAL FORM
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

Your Name: Spring Allen

Document Category: Facility

Document Group: Inspection/Investigation

Document Type: Other (O)

EPA ID: NCS000000193

Facility Name/Subject: Southern Agricultural Insecticides

Document Date: 02/26/1987

Description:

Investigation and sampling with CO, 25 March 1985 - 26 February 1987

Author: Various

Branch/Unit:

Facility/Site Address:

Facility/Site City:

Facility/Site State: North Carolina

Facility/Site Zipcode:

Facility/Site County: Henderson

File Room Use Only

	Month	Day	Year
Date Received by File Room:	10	14	2016
Date Scanned:	16	14	2016

Scanner's Initial:

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Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Spring Allen
EPA ID: ~~4500000100~~ NCS 000000193
Facility Name: Soutern Agricultural Insecticides
Document Group: Inspection/Investigation (I)
Document Type: Other (O)
Description: investigation and sampling with CO March 25, 1985-- February 26, 1987
Date of Doc: 3/25/1985
Author of Doc: various

File Room Use Only

Date Recieved by File Room:
Date Scanned:

Month	Day	Year
10	14	2016
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SAMPLE ANALYSES REQUEST

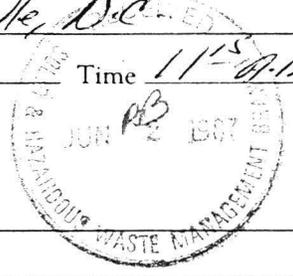
Site Number 45000001100Y Field Sample Number 000053

Name of Site Southern Agricultural Insecticides Site Location Hendersonville, N.C.

Collected By Mastens ID# 01 Date Collected 2-26-87 Time 11:50 AM

Type of Sample:

Environmental	Concentrate	<u>Sample #1</u>	Comments
<input type="checkbox"/> Groundwater (1)	<input type="checkbox"/> Solid (5)		
<input checked="" type="checkbox"/> Surface Water (2)	<input type="checkbox"/> Liquid (6)		
<input type="checkbox"/> Soil (3)	<input type="checkbox"/> Sludge (7)		
<input type="checkbox"/> Other (4)	<input type="checkbox"/> Other (8)		



INORGANIC CHEMISTRY

Extractables		Total			
Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
<input type="checkbox"/> Arsenic	_____	<input type="checkbox"/> Arsenic	_____	<input type="checkbox"/> Silver	_____
<input type="checkbox"/> Barium	_____	<input type="checkbox"/> Barium	_____	<input type="checkbox"/> Sulfates	_____
<input type="checkbox"/> Cadmium	_____	<input type="checkbox"/> Cadmium	_____	<input type="checkbox"/> Zinc	_____
<input type="checkbox"/> Chromium	_____	<input type="checkbox"/> Chloride	_____	<input type="checkbox"/> Ph	_____
<input type="checkbox"/> Lead	_____	<input type="checkbox"/> Chromium	_____	<input type="checkbox"/> Conductivity	_____
<input type="checkbox"/> Mercury	_____	<input type="checkbox"/> Copper	_____	<input type="checkbox"/> TDS	_____
<input type="checkbox"/> Selenium	_____	<input type="checkbox"/> Fluoride	_____	<input type="checkbox"/> TOC	_____
<input type="checkbox"/> Silver	_____	<input type="checkbox"/> Iron	_____		
		<input type="checkbox"/> Lead	_____		
		<input type="checkbox"/> Manganese	_____		
		<input type="checkbox"/> Mercury	_____		
		<input type="checkbox"/> Nitrate	_____		
		<input type="checkbox"/> Selenium	_____		

ORGANIC CHEMISTRY

Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
<input type="checkbox"/> P&T:GC/MS	_____	<input type="checkbox"/> EDB	_____	<input checked="" type="checkbox"/> Methoxychlor	<u>< 0.10 ppm</u>
<input type="checkbox"/> Acid:B/N Ext.	_____	<input type="checkbox"/> PCB's	_____	<input type="checkbox"/> Toxaphene	_____
<input type="checkbox"/> TOX	_____	<input type="checkbox"/> Petroleum	_____	<input type="checkbox"/> 2,4-D	_____
		<input type="checkbox"/> Endrin	_____	<input checked="" type="checkbox"/> 2,4,5-TP (silvex)	_____
		<input type="checkbox"/> Lindane	_____	<input checked="" type="checkbox"/> Endosulfan I	<u>0.13 ppm</u>
				<input checked="" type="checkbox"/> Endosulfan II	<u>0.08 ppm</u>

MICROBIOLOGY

RADIOCHEMISTRY

Parameter	Parameter	Results PCi/1
<input type="checkbox"/> (MF) Coliform Colonies/100mls	<input type="checkbox"/> Gross Alpha	_____
<input type="checkbox"/> (MPN) Coliform Colonies/100mls	<input type="checkbox"/> Gross Beta	_____

Date Received 3-2-87 FB Date Reported 5-21-87
 Date Extracted 3/4/87 FB Date Analyzed 5-1-87 V.P., 5-4-87 B.D.
 Reported By John P. Neal Lab Number 700501

Purpose: Enforcement and compliance with the N. C. Solid and Hazardous Waste Management Rules.

Preparation A sample analyses request form (DHS 3191) must be completed for each type of evaluation requested (e.g., inorganic, organic, microbiology, radiochemistry). For sampling conditions which require more than one (1) container (i.e., ground or surface water from landfills) a sample label must be affixed to one of the containers. The collector must then write the **site** and **sample** number on the duplicate.

Do not submit an analysis request sheet with no parameters indicated.

Equivalent measurements:

$$\begin{aligned} \text{ppm} &= \mu\text{g}/\text{ml} = \text{mg}/1 = \mu\text{g}/\text{g} = \text{mg}/\text{kg} \\ \text{ppb} &= \mu\text{g}/1 = \mu\text{g}/1000\text{g} = \mu\text{g}/\text{kg} \end{aligned}$$

DEFINITIONS/INSTRUCTIONS

Site Number — A twelve-digit site/location identifier, assigned only by the district field representative.

Field Sample Number — A six-digit sample identifier which is pre-printed on the sample label.

Name of Site — Name of landfill, facility, etc.

Site Location — Address, street number, state road, etc.

Collected By — Name and ID of sample collector.

Date and Time Collected — Self-explanatory.

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Concentrate — A sample of a waste, including but not limited to, sludges, resins, treatment effluents or drummed wastes.

Comments — Lists details regarding sample or sample point, including but limited to, phase separation, and/or odors.

Inorganic Chemistry — Check (✓) the desired parameters to be analyzed. Extractables are only performed on a solid or semi-solid. For routine landfill samples, check all parameters in the second and third columns.

Organic Chemistry — Check (✓) the desired parameter to be analyzed. If not listed, enter the name in the space provided.

Microbiology and Radiochemistry — The Raleigh office should be consulted prior to sampling for either of these.

Distribution: 1. Original to State Laboratory of Public Health

Environmental Sciences Branch
P. O. Box 28047
Raleigh, NC 27611

2. Lab sends copy to Solid and Hazardous Waste Management Branch.

3. Solid and Hazardous Waste Management Branch sends copy to field person.

Disposition: This form may be destroyed in accordance with the Environmental Health, Solid and Hazardous Waste Section of the *Records Disposition Schedule* as published by the North Carolina Division of Archives and History.

Additional forms may be ordered from:

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

SAMPLE ANALYSES REQUEST

Site Number 45000001100X Field Sample Number 000054
 Name of Site Southern Agricultural Insecticide Site Location Henrieville, N.C.
 Collected By M. S. Jones ID# 01 Date Collected 2-23-87 Time 11:20

Type of Sample:

- | | |
|--|-------------------------------------|
| Environmental | Concentrate |
| <input type="checkbox"/> Groundwater (1) | <input type="checkbox"/> Solid (5) |
| <input type="checkbox"/> Surface Water (2) | <input type="checkbox"/> Liquid (6) |
| <input checked="" type="checkbox"/> Soil (3) | <input type="checkbox"/> Sludge (7) |
| <input type="checkbox"/> Other (4) | <input type="checkbox"/> Other (8) |

Comments Sample # 2 PB

INORGANIC CHEMISTRY

Extractables		Total			
Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
_____ Arsenic	_____	_____ Arsenic	_____	_____ Silver	_____
_____ Barium	_____	_____ Barium	_____	_____ Sulfates	_____
_____ Cadmium	_____	_____ Cadmium	_____	_____ Zinc	_____
_____ Chromium	_____	_____ Chloride	_____	_____ Ph	_____
_____ Lead	_____	_____ Chromium	_____	_____ Conductivity	_____
_____ Mercury	_____	_____ Copper	_____	_____ TDS	_____
_____ Selenium	_____	_____ Fluoride	_____	_____ TOC	_____
_____ Silver	_____	_____ Iron	_____	_____	_____
_____	_____	_____ Lead	_____	_____	_____
_____	_____	_____ Manganese	_____	_____	_____
_____	_____	_____ Mercury	_____	_____	_____
_____	_____	_____ Nitrate	_____	_____	_____
_____	_____	_____ Selenium	_____	_____	_____

ORGANIC CHEMISTRY

Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
_____ P&T:GC/MS	_____	_____ EDB	_____	<input checked="" type="checkbox"/> Methoxychlor	<u>0.54 ppm</u>
_____ Acid:B/N Ext.	_____	_____ PCB's	_____	_____ Toxaphene	_____
_____ TOX	_____	_____ Petroleum	_____	_____ 2,4-D	_____
_____	_____	_____ Endrin	_____	<input checked="" type="checkbox"/> 2,4,5-TP (silvex)	_____
_____	_____	_____ Lindane	_____	<input checked="" type="checkbox"/> Endosulfan I	<u>3.53 ppm</u>
_____	_____	<u>ENDOSULFAN II</u>	<u>1.76 ppm</u>	<input checked="" type="checkbox"/> Dieldrin	<u>0.19 ppm</u>

MICROBIOLOGY

Parameter
_____ (MF) Coliform Colonies/100mls
_____ (MPN) Coliform Colonies/100mls

RADIOCHEMISTRY

Parameter	Results PCi/1
_____ Gross Alpha	_____
_____ Gross Beta	_____
_____	_____
_____	_____

Date Received 3-2-87 FB Date Reported _____
 Date Extracted 3/4/87 FB Date Analyzed GC/MS 5-8-87 V.P. GC/MS 5-5-87 B.D.
 Reported By _____ Lab Number 700535

Purpose: Enforcement and compliance with the N. C. Solid and Hazardous Waste Management Rules.

Preparation A sample analyses request form (DHS 3191) must be completed for each type of evaluation requested (e.g., inorganic, organic, microbiology, radiochemistry). For sampling conditions which require more than one (1) container (i.e., ground or surface water from landfills) a sample label must be affixed to one of the containers. The collector must then write the **site** and **sample** number on the duplicate.

Do not submit an analysis request sheet with no parameters indicated.

Equivalent measurements:

$$\begin{aligned} \text{ppm} &= \mu\text{g}/\text{ml} = \text{mg}/1 = \mu\text{g}/\text{g} = \text{mg}/\text{kg} \\ \text{ppb} &= \mu\text{g}/1 = \mu\text{g}/1000\text{g} = \mu\text{g}/\text{kg} \end{aligned}$$

DEFINITIONS/INSTRUCTIONS

Site Number — A twelve-digit site/location identifier, assigned only by the district field representative.

Field Sample Number — A six-digit sample identifier which is pre-printed on the sample label.

Name of Site — Name of landfill, facility, etc.

Site Location — Address, street number, state road, etc.

Collected By — Name and ID of sample collector.

Date and Time Collected — Self-explanatory.

Environmental — A sample of a naturally occurring substance such as groundwater, surface water or soils which may be contaminated.

Concentrate — A sample of a waste, including but not limited to, sludges, resins, treatment effluents or drummed wastes.

Comments — Lists details regarding sample or sample point, including but limited to, phase separation, and/or odors.

Inorganic Chemistry — Check (✓) the desired parameters to be analyzed. Extractables are only performed on a solid or semi-solid. For routine landfill samples, check all parameters in the second and third columns.

Organic Chemistry — Check (✓) the desired parameter to be analyzed. If not listed, enter the name in the space provided.

Microbiology and Radiochemistry — The Raleigh office should be consulted prior to sampling for either of these.

Distribution: 1. Original to State Laboratory of Public Health

Environmental Sciences Branch
P. O. Box 28047
Raleigh, NC 27611

2. Lab sends copy to Solid and Hazardous Waste Management Branch.

3. Solid and Hazardous Waste Management Branch sends copy to field person.

Disposition: This form may be destroyed in accordance with the Environmental Health, Solid and Hazardous Waste Section of the *Records Disposition Schedule* as published by the North Carolina Division of Archives and History.

Additional forms may be ordered from:

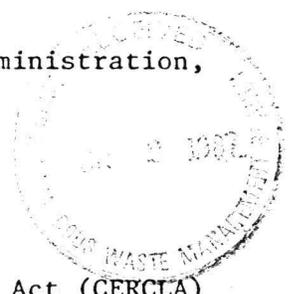
Solid and Hazardous Waste Management Branch
Division of Health Services
P. O. Box 2091
Raleigh, NC 27602-2091

N. C. DEPARTMENT OF HUMAN RESOURCES
 DIVISION OF HEALTH SERVICES
 SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

Receipt for Samples

The samples described below were collected in connection with the administration, enforcement, and documentation of the:

- North Carolina Hazardous Waste Management Rules, 10 NCAC 10F
- North Carolina Solid Waste Management Rules, 10 NCAC 10G
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- Toxic Substances Control Act (TSCA) 15 U.S.C. §2601, et seq., specifically Section 11 of TSCA, 15 U.S.C. § 2610.



Keith D. Parsons Inspector's Name Rt # 279, Hendersonville, N.C. Inspector's Address
Southern Agricultural Insecticides, P.O. Box 420, Hendersonville, N.C. Name of Firm Firm Address
Ed Diem Firm owner, Operator, or Agent Vice President Title Ed Diem

SAMPLE NUMBER	COLLECTED		SAMPLE TYPE			DUPLICATE SAMPLES			SAMPLE LOCATION	
	DATE	TIME	WATER	SOIL	OTHER	OFFERED	ACCEPTED	REJECTED	ON-SITE	OFF-SITE
000053	2/23/89	11:15 AM		✓		✓	✓		✓	
000054	2/23/89	11:20 AM		✓		✓	✓		✓	
1										
2										

Receipt for the sample(s) described above is hereby acknowledged:

Receipt/rejection of duplicate or split samples is hereby acknowledged:

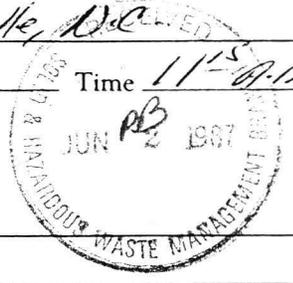
Keith D. Parsons
 Signature of Inspector
Charles Mgt. Spec
 Title

Ed Diem
 Signature of Firm Owner, Operator, or Agent
VP/SEC
 Title

COMMENTS _____

SAMPLE ANALYSES REQUEST

Site Number 45000001100X Field Sample Number 000053
 Name of Site Southern Agricultural Insecticides Site Location Hendersonville, N.C.
 Collected By Mastens ID# 01 Date Collected 2-26-87 Time 11:40



Type of Sample:

Environmental	Concentrate	<u>Sample #1</u>	Comments
<input type="checkbox"/> Groundwater (1)	<input type="checkbox"/> Solid (5)		
<input checked="" type="checkbox"/> Surface Water (2)	<input type="checkbox"/> Liquid (6)		
<input type="checkbox"/> Soil (3)	<input type="checkbox"/> Sludge (7)		
<input type="checkbox"/> Other (4)	<input type="checkbox"/> Other (8)		

INORGANIC CHEMISTRY

Extractables		Total			
Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
<input type="checkbox"/> Arsenic	_____	<input type="checkbox"/> Arsenic	_____	<input type="checkbox"/> Silver	_____
<input type="checkbox"/> Barium	_____	<input type="checkbox"/> Barium	_____	<input type="checkbox"/> Sulfates	_____
<input type="checkbox"/> Cadmium	_____	<input type="checkbox"/> Cadmium	_____	<input type="checkbox"/> Zinc	_____
<input type="checkbox"/> Chromium	_____	<input type="checkbox"/> Chloride	_____	<input type="checkbox"/> Ph	_____
<input type="checkbox"/> Lead	_____	<input type="checkbox"/> Chromium	_____	<input type="checkbox"/> Conductivity	_____
<input type="checkbox"/> Mercury	_____	<input type="checkbox"/> Copper	_____	<input type="checkbox"/> TDS	_____
<input type="checkbox"/> Selenium	_____	<input type="checkbox"/> Fluoride	_____	<input type="checkbox"/> TOC	_____
<input type="checkbox"/> Silver	_____	<input type="checkbox"/> Iron	_____		
		<input type="checkbox"/> Lead	_____		
		<input type="checkbox"/> Manganese	_____		
		<input type="checkbox"/> Mercury	_____		
		<input type="checkbox"/> Nitrate	_____		
		<input type="checkbox"/> Selenium	_____		

ORGANIC CHEMISTRY

Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
<input type="checkbox"/> P&T:GC/MS	_____	<input type="checkbox"/> EDB	_____	<input checked="" type="checkbox"/> Methoxychlor	<u>< 0.10 ppm</u>
<input type="checkbox"/> Acid:B/N Ext.	_____	<input type="checkbox"/> PCB's	_____	<input type="checkbox"/> Toxaphene	_____
<input type="checkbox"/> TOX	_____	<input type="checkbox"/> Petroleum	_____	<input type="checkbox"/> 2,4-D	_____
		<input type="checkbox"/> Endrin	_____	<input checked="" type="checkbox"/> 2,4,5-TP (silvex)	<u>0.13 ppm</u>
		<input type="checkbox"/> Lindane	_____	<input type="checkbox"/> ENDOSULFAN I	<u>0.08 ppm</u>
				<input type="checkbox"/> ENDOSULFAN II	<u>0.08 ppm</u>

MICROBIOLOGY

RADIOCHEMISTRY

Parameter	Parameter	Results PCi/1
<input type="checkbox"/> (MF) Coliform Colonies/100mls	<input type="checkbox"/> Gross Alpha	_____
<input type="checkbox"/> (MPN) Coliform Colonies/100mls	<input type="checkbox"/> Gross Beta	_____

Date Received 3-2-87 PB Date Reported 5-21-87
 Date Extracted 3/4/87 PB Date Analyzed 5-1-87 V.P., GC/MS 5-4-87 B.D.
 Reported By John P. Neal Lab Number 700501

Purpose: Enforcement and compliance with the N. C. Solid and Hazardous Waste Management Rules.

Preparation A sample analyses request form (DHS 3191) must be completed for each type of evaluation requested (e.g., inorganic, organic, microbiology, radiochemistry). For sampling conditions which require more than one (1) container (i.e., ground or surface water from landfills) a sample label must be affixed to one of the containers. The collector must then write the **site** and **sample** number on the duplicate.

Do not submit an analysis request sheet with no parameters indicated.

Equivalent measurements:

$$\begin{aligned} \text{ppm} &= \mu\text{g}/\text{ml} = \text{mg}/\text{l} = \mu\text{g}/\text{g} = \text{mg}/\text{kg} \\ \text{ppb} &= \mu\text{g}/\text{l} = \mu\text{g}/1000\text{g} = \mu\text{g}/\text{kg} \end{aligned}$$

DEFINITIONS/INSTRUCTIONS

Site Number — A twelve-digit site/location identifier, assigned only by the district field representative.

Field Sample Number — A six-digit sample identifier which is pre-printed on the sample label.

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Site Location — Address, street number, state road, etc.

Collected By — Name and ID of sample collector.

Date and Time Collected — Self-explanatory.

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Comments — Lists details regarding sample or sample point, including but limited to, phase separation, and/or odors.

Inorganic Chemistry — Check (✓) the desired parameters to be analyzed. Extractables are only performed on a solid or semi-solid. For routine landfill samples, check all parameters in the second and third columns.

Organic Chemistry — Check (✓) the desired parameter to be analyzed. If not listed, enter the name in the space provided.

Microbiology and Radiochemistry — The Raleigh office should be consulted prior to sampling for either of these.

Distribution: 1. Original to State Laboratory of Public Health

Environmental Sciences Branch
P. O. Box 28047
Raleigh, NC 27611

2. Lab sends copy to Solid and Hazardous Waste Management Branch.

3. Solid and Hazardous Waste Management Branch sends copy to field person.

Disposition: This form may be destroyed in accordance with the Environmental Health, Solid and Hazardous Waste Section of the *Records Disposition Schedule* as published by the North Carolina Division of Archives and History.

Additional forms may be ordered from:

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

SAMPLE ANALYSES REQUEST

Site Number 4500000100X Field Sample Number 000054

Name of Site Southern Agricultural Insecticide Site Location Henrieville, N.C.

Collected By M. Jones ID# 01 Date Collected 2-23-87 Time 11:20

Type of Sample:

- | | |
|--|-------------------------------------|
| Environmental | Concentrate |
| <input type="checkbox"/> Groundwater (1) | <input type="checkbox"/> Solid (5) |
| <input type="checkbox"/> Surface Water (2) | <input type="checkbox"/> Liquid (6) |
| <input checked="" type="checkbox"/> Soil (3) | <input type="checkbox"/> Sludge (7) |
| <input type="checkbox"/> Other (4) | <input type="checkbox"/> Other (8) |

Comments Sample # 2 PB

INORGANIC CHEMISTRY

Extractables		Total			
Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
<input type="checkbox"/> Arsenic	_____	<input type="checkbox"/> Arsenic	_____	<input type="checkbox"/> Silver	_____
<input type="checkbox"/> Barium	_____	<input type="checkbox"/> Barium	_____	<input type="checkbox"/> Sulfates	_____
<input type="checkbox"/> Cadmium	_____	<input type="checkbox"/> Cadmium	_____	<input type="checkbox"/> Zinc	_____
<input type="checkbox"/> Chromium	_____	<input type="checkbox"/> Chloride	_____	<input type="checkbox"/> Ph	_____
<input type="checkbox"/> Lead	_____	<input type="checkbox"/> Chromium	_____	<input type="checkbox"/> Conductivity	_____
<input type="checkbox"/> Mercury	_____	<input type="checkbox"/> Copper	_____	<input type="checkbox"/> TDS	_____
<input type="checkbox"/> Selenium	_____	<input type="checkbox"/> Fluoride	_____	<input type="checkbox"/> TOC	_____
<input type="checkbox"/> Silver	_____	<input type="checkbox"/> Iron	_____		
		<input type="checkbox"/> Lead	_____		
		<input type="checkbox"/> Manganese	_____		
		<input type="checkbox"/> Mercury	_____		
		<input type="checkbox"/> Nitrate	_____		
		<input type="checkbox"/> Selenium	_____		

ORGANIC CHEMISTRY

Parameter	Results mg/1	Parameter	Results mg/1	Parameter	Results mg/1
<input type="checkbox"/> P&T:GC/MS	_____	<input type="checkbox"/> EDB	_____	<input checked="" type="checkbox"/> Methoxychlor	<u>0.54 ppm</u>
<input type="checkbox"/> Acid:B/N Ext.	_____	<input type="checkbox"/> PCB's	_____	<input type="checkbox"/> Toxaphene	_____
<input type="checkbox"/> TOX	_____	<input type="checkbox"/> Petroleum	_____	<input type="checkbox"/> 2,4-D	_____
		<input type="checkbox"/> Endrin	_____	<input checked="" type="checkbox"/> 2,4,5-TP (silvex)	<u>3.53 ppm</u>
		<input type="checkbox"/> Lindane	_____	<input checked="" type="checkbox"/> Endosulfan II	<u>1.76 ppm</u>
				<input type="checkbox"/> Dieldrin	<u>0.19 ppm</u>

MICROBIOLOGY

RADIOCHEMISTRY

Parameter	Parameter	Results PCi/1
<input type="checkbox"/> (MF) Coliform Colonies/100mls	<input type="checkbox"/> Gross Alpha	_____
<input type="checkbox"/> (MPN) Coliform Colonies/100mls	<input type="checkbox"/> Gross Beta	_____

Date Received 3-2-87 FB Date Reported _____
 Date Extracted 3/4/87 FB Date Analyzed GC/MS 5-8-87 GC/MS 5-5-87
 Reported By _____ Lab Number 700535

Purpose: Enforcement and compliance with the N. C. Solid and Hazardous Waste Management Rules.

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Equivalent measurements:

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P. O. Box 28047
Raleigh, NC 27611

2. Lab sends copy to Solid and Hazardous Waste Management Branch.

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Additional forms may be ordered from:

Solid and Hazardous Waste Management Branch
Division of Health Services
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Raleigh, NC 27602-2091

N. C. DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES
SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH



Chain of Custody Record

Hazardous Waste Materials

Location of Sampling: Generator Transporter Treatment Facility

Storage Facility Disposal Facility Landfill

Other: Wash/Waste Pit - outside of Pit.

Company's Name Southern Agricultural Products Telephone (704) 692-2233

Address PO Box 429 Hendersonville, N.C. 28793

Collector's Name Keith D. Martin Telephone (704) 688-4237
signature

Date Sampled Feb 23, 1987 Time Sampled 11¹⁵ AM.

Type of Process Generating Waste Mfg. of Pesticides

Field Information

Soil Samples Taken Outside of Closed Wash/Waste Pit.

Field Sample No. _____

Chain of Possession:

1. Keith D. Martin Waste Mgt. Spec. 2-23-87 - 2-26-87
signature title inclusive dates
2. R. Douglas Hylford Field Inspection Supervisor 2-26-87 / 3-2-87
signature title inclusive dates
3. Norma J. Huse Chemical Analyst 3-02-87
signature title inclusive dates

Results reported

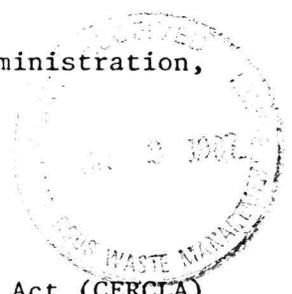
signature title date

Instructions: Complete all applicable information including signatures, and submit with analysis request forms.

N. C. DEPARTMENT OF HUMAN RESOURCES
 DIVISION OF HEALTH SERVICES
 SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

Receipt for Samples

The samples described below were collected in connection with the administration, enforcement, and documentation of the:



- North Carolina Hazardous Waste Management Rules, 10 NCAC 10F
- North Carolina Solid Waste Management Rules, 10 NCAC 10G
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- Toxic Substances Control Act (TSCA) 15 U.S.C. §2601, et seq., specifically Section 11 of TSCA, 15 U.S.C. § 2610.

Keith D. Parsons Inspector's Name Rt #1 Box 279, Hickensville, N.C. Inspector's Address
Southern Agricultural Insecticides, P.O. Box 420, Hickensville, N.C. Name of Firm Firm Address
Ed Diem Firm owner, Operator, or Agent Vice President Title Same Address

SAMPLE NUMBER	COLLECTED		SAMPLE TYPE			DUPLICATE SAMPLES			SAMPLE LOCATION	
	DATE	TIME	WATER	SOIL	OTHER	OFFERED	ACCEPTED	REJECTED	ON-SITE	OFF-SITE
000053	2/23/89	11:15 AM		✓		✓	✓		✓	
000054	2/23/89	11:20 AM		✓		✓	✓		✓	

Receipt for the sample(s) described above is hereby acknowledged:

Receipt/rejection of duplicate or split samples is hereby acknowledged:

Keith D. Parsons
 Signature of Inspector
William M. Spec
 Title

Ed Diem
 Signature of Firm Owner, Operator, or Agent
VP/SEC
 Title

COMMENTS _____

Southern Agricultural Insecticides.

to Enic Petitt - 2.3.87

had helped to

Black Henderson - Oct. 86

from the Desk of
KEITH LAWSON

Emil,

Please note any
of this information
you need for your
records and then
return to me.

Thanks

Run copy for
PROV. so.
file

Call
Ed Diem (Diem)

Arrange for Billings

1-800-438-4426

In N.C. then. 2-15-87

DYE, SCOTT & DEITRICH, P.A.

ATTORNEYS AT LAW

1111 THIRD AVENUE WEST

P.O. DRAWER 9480

BRADENTON, FLORIDA 33506

PHONE (813) 748-4411

DEWEY A. DYE (1898-1969)

DEWEY A. DYE, JR.
ROBERT L. SCOTT
DAVID K. DEITRICH
PHILIP E. PERREY
C. ROBERT PICKETT
PATRICIA A. PETRUFF
JOHN V. QUINLAN
ALAN M. ORAVEC
STEPHEN R. DYE
T. HARRISON DUKE

June 14, 1985



Mr. Keith Lawson
North Carolina Department of
Human Resources
Division of Health Services
P.O. Box 2091
Raleigh, N.C. 27602

Re: Southern Agricultural Insecticides, Inc.

Dear Mr. Lawson:

In conformance with your letter dated May 23, 1985, Southern Agricultural Insecticides, Inc. is in the process of taking soil samples to demonstrate that there has been no soil contamination. A total of eight (8) samples will be taken, two on each side of the tank. One sample will be taken at a depth of 8 inches and the other will be taken at a depth of 18 inches. The four samples of each depth will then be combined and one analysis completed on each for a total of two analyses. The samples will be analyzed for endosulfan and methoxychlor.

I have advised Southern Agricultural Insecticides, Inc. that if soil contamination is discovered additional testing will be required. The sampling program will commence the week of June 24, 1985. If you have any problems with the program as proposed, please contact me immediately.

Sincerely,

Patricia A. Petruff
Patricia A. Petruff

PAP/lrb
cc: Robert Diem
Ed Diem

SOUTHERN AGRICULTURAL INSECTICIDES, INC.

HENDERSONVILLE FACILITY

CLOSURE PLAN

(40 CFR 265 SUBPART G)

I. APPLICABILITY, 40 CFR 265.110

A. INTRODUCTION

40 CFR 265.111 through 40 CFR 265.115 applies to the owners and operators of all hazardous waste management facilities. It has been determined by the North Carolina Department of Human Resources that a concrete tank located at the Southern Agricultural Insecticides, Inc.'s Hendersonville plant premises contains a small quantity of endosulfan and methoxychlor. At the time of analysis, this tank contained 3400 gallons of water. The concentration of endosulfan is 11.6 milligrams per liter and the concentration of methoxychlor is 27 milligrams per liter. Pursuant to 40 CFR 261.24, a solid waste which contains methoxychlor and exhibits the characteristics of EP toxicity at a level of ten milligrams per liter is considered a hazardous waste when it is discarded. Pursuant to 40 CFR 261.33, any commercial chemical product containing any level of endosulfan is considered to be a hazardous waste when it is discarded or is intended to be discarded.

The containment structure constitutes a tank not a surface impoundment as indicated in North Carolina's March 25, 1985 letter. Both of these terms are defined in 40 CFR 260.10. As defined, tanks are constructed primarily of non-earthen material such as concrete while surface impoundments are constructed primarily of earthen materials. Attached as Exhibit 1 is a plan view of the tank. Both the sides and the bottom are solid concrete. Attached as Exhibits 2 and 3 are photographs of the tank.

Southern Agricultural Insecticides, Inc. has been requested to provide the North Carolina Department of Human Resources a plan to dispose of this material. The following plan assumes that the material qualifies as a hazardous waste. The plan complies with 40 CFR 265, Subpart G.

II. CLOSURE PLAN; AMENDMENT OF PLAN 40 CFR 265.112

A. PLAN REQUIRED

The following constitutes the written closure plan required by 40 CFR 265.112(a). A copy of this plan and all revisions is kept at the facility. A copy has also been submitted to the North Carolina Department of Human Resources, Division of Health Services, P.O. Box 2091, Raleigh, North Carolina 27602-2091.

1. DESCRIPTION OF HOW AND WHEN THE FACILITY WILL BE PARTIALLY CLOSED, IF APPLICABLE, AND FINALLY CLOSED.

The tank located at the Southern Agricultural Insecticides, Inc.'s Hendersonville plant will be closed in accordance with

applicable rules and regulations within ninety (90) days of approval of this plan. The estimated final closure date is July 27, 1985.

During the next ninety (90) days, Southern Agricultural Insecticides, Inc., in conformance with the Hazardous and Solid Waste Amendments of 1984, will make every reasonable effort to minimize the volume of this waste. The material in the tank will be aereated to promote evaporation. The tank is also protected from rain by a domed cover constructed of polyethylene (visqueen). This cover concentrates the heat, speeding the evaporation process. An evaporation rate of up to 1/4 inch per day is anticipated. At present, the tank contains seventeen (17) inches of water of which two (2) inches is estimated to be solid waste. Daily inspections to check the rate of evaporation will be conducted. All information will be placed in a log.

Following evaporation, it is estimated that two (2) inches of solid waste will remain in the tank. This waste will be removed by shovel, placed in 55 gallon drums, and transported to a licensed hazardous waste disposal facility such as SCA which is located in South Carolina. The total volume of remaining solid waste is estimated to be 1.3 tons. This will require approximately six 55 gallon drums. All drums will be marked in accordance with applicable regulations and manifest requirements will be followed.

To insure that closure is complete by day ninety, the contents

of the tank will be removed regardless of whether the water in the tank is fully evaporated. All material will be placed in drums and transported to a licensed hazardous waste disposal facility.

Absorbant material such as vermiculite will be used if necessary.

Workers transferring the material from the tank to the drums will be provided with protective clothing such as gloves, rubber boots and dust masks. Following removal of the material, the tank and all equipment will be wiped clean with rags. These rags will be placed in the drums.

The tank will remain in place for future use by the facility. The tank will not be used to store hazardous waste.

(a) COMPLIANCE WITH 40 CFR 265.111; CLOSURE
PERFORMANCE STANDARD.

The plan as described above will eliminate the need for any further maintenance because all hazardous waste will be transported and disposed of off site. The plan eliminates any potential threat to human health and the environment because it will minimize the volume of hazardous waste through evaporation. There is no potential for escape of hazardous waste, hazardous waste constituents, leachates, contaminated rainfall or waste decomposition products to the groundwater, surface water or to the atmosphere from the tank.

(b) COMPLIANCE WITH 40 CFR 265.113; CLOSURE, TIME ALLOWED FOR CLOSURE

No additional methoxychlor, endosulfan, or liquid is being placed in the tank. All existing waste will be removed within ninety (90) days from the date of approval of this closure plan. If necessary, Southern Agricultural Insecticides, Inc. will remove the contents of the tank in its liquid form transferring same to 55 gallon drums. Absorbant material will then be added and the waste transported and disposed of at a licensed hazardous waste disposal facility. If an amendment of the time for closure is required, Southern Agricultural Insecticides, Inc. will request an extension by making the demonstration set forth in 40 CFR 265.113.

(c) COMPLIANCE WITH 40 CFR 265.114; DISPOSAL OR DECONTAMINATION OF EQUIPMENT

The closure of this tank will not result in contamination of any equipment or structures. The waste will not react with any equipment used to handle or transfer it. If necessary, upon completion of closure, all equipment such as shovels which comes into contact with the waste will be wiped clean with rags. These rags will be disposed of by an approved method.

(d) COMPLIANCE WITH 40 CFR 265.115; CERTIFICATION OF CLOSURE

At the completion of closure, the owner will submit to the North Carolina Department of Human Resources a certification by both the

owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. Said certification will be provided on agency approved forms if such forms are available.

(e) COMPLIANCE WITH 40 CFR 265.178; CLOSURE FOR CONTAINERS

Not applicable

(f) COMPLIANCE WITH 40 CFR 265.197; CLOSURE FOR TANKS

All hazardous waste and residues will be removed from the tank at closure. The concrete sides of the tank will not react with either endosulfan or methoxychlor. The sides and floor of the tank will be wiped clean with rags to insure that there will be no residues remaining on the walls or floor of the tank.

(g) COMPLIANCE WITH 40 CFR 265.228; CLOSURE AND POST CLOSURE CARE FOR SURFACE IMPOUNDMENTS

Not applicable

(h) COMPLIANCE WITH 40 CFR 265.258; CLOSURE AND POST CLOSURE CARE FOR WASTE PILES

Not applicable.

(i) COMPLIANCE WITH 40 CFR 265.280; CLOSURE FOR LAND TREATMENT

Not applicable.

(j) COMPLIANCE WITH 40 CFR 265.310; CLOSURE FOR LAND
FILLS

Not applicable.

(k) COMPLIANCE WITH 40 CFR 265.351; CLOSURE FOR
INCINERATORS

Not applicable.

(l) COMPLIANCE WITH 40 CFR 265.381; CLOSURE FOR
THERMAL TREATMENT

Not applicable.

(m) COMPLIANCE WITH 40 CFR 265.404; CLOSURE FOR
CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT

Not applicable.

2. AN ESTIMATE OF THE MAXIMUM INVENTORY OF WASTE IN
STORAGE AND IN TREATMENT ANY TIME DURING THE LIFE OF THE FACILITY.

The estimate of the contents of the tank on April 25, 1985 is
2700 gallons of water and 1.3 tons of solids. No additional waste
is being added to this tank. Attached as Exhibit 4 are the
calculations which demonstrate how these figures were obtained.

3. DESCRIPTION OF THE STEPS TO DECONTAMINATE FACILITY
EQUIPMENT.

Physical contact with the waste will not contaminate equipment.
If necessary, equipment which comes into contact with the waste will
be wiped clean with rags. These rags will be disposed of in
accordance with applicable regulations.

4. ESTIMATE OF THE EXPECTED YEAR OF CLOSURE AND A SCHEDULE FOR FINAL CLOSURE

The estimated year of closure is 1985. The estimated date of final closure is July 27, 1985. During April, May and June of 1985, the liquid in the tank will be aerated to accelerate the evaporation process. On day eighty of the closure time period, removal of the remaining liquid and solid waste will commence. It is estimated that 1.3 tons of solids will need to be removed. This will require approximately six 55 gallon drums. Additional drums may be needed if evaporation at the estimated rate has not occurred. All waste will be removed by day ninety (90). Since the tank is a self contained structure, there is no need to test surrounding soils or groundwater for contamination.

B. AMENDMENT OF CLOSURE PLAN

Not applicable.

C. NOTIFICATION

In accordance with this section, notification is provided to the North Carolina Department of Human Resources that closure at the Hendersonville plant has commenced and will be completed within ninety (90) days of approval of this plan.

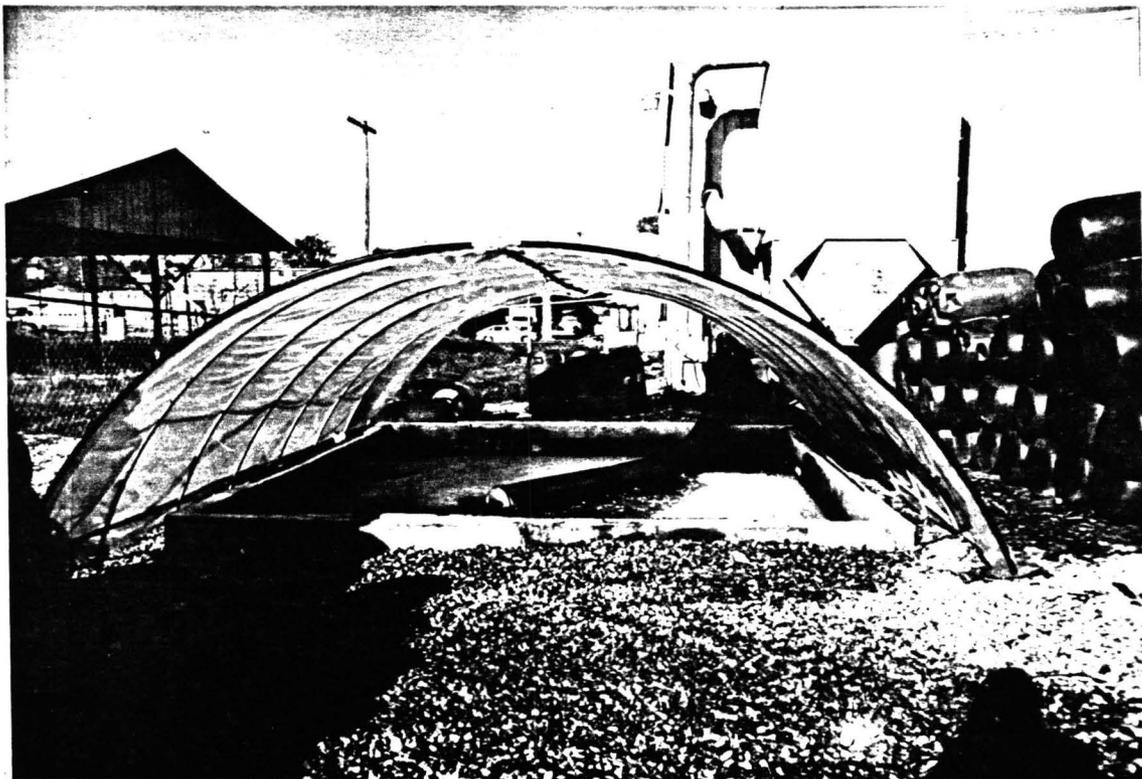
III. CLOSURE: TIME ALLOWED FOR CLOSURE 40 CFR 265.113

IV. NOTICE TO LOCAL LAND AUTHORITY; 40 CFR 265.119

Not applicable because this facility is not a disposal facility.

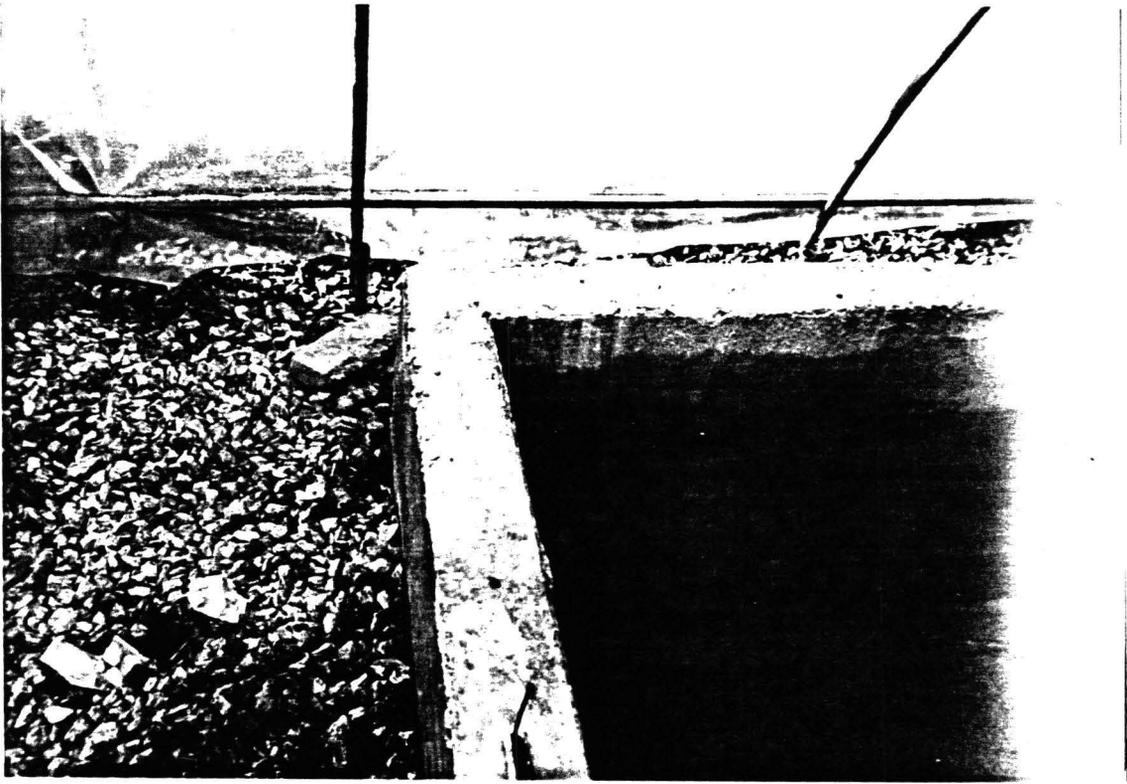
V. NOTICE IN DEED TO PROPERTY; 40 CFR 265.120

Not applicable because this facility is not a disposal facility.



View of tank with cover.

Exhibit 2



Close up view of tank.

Exhibit 3

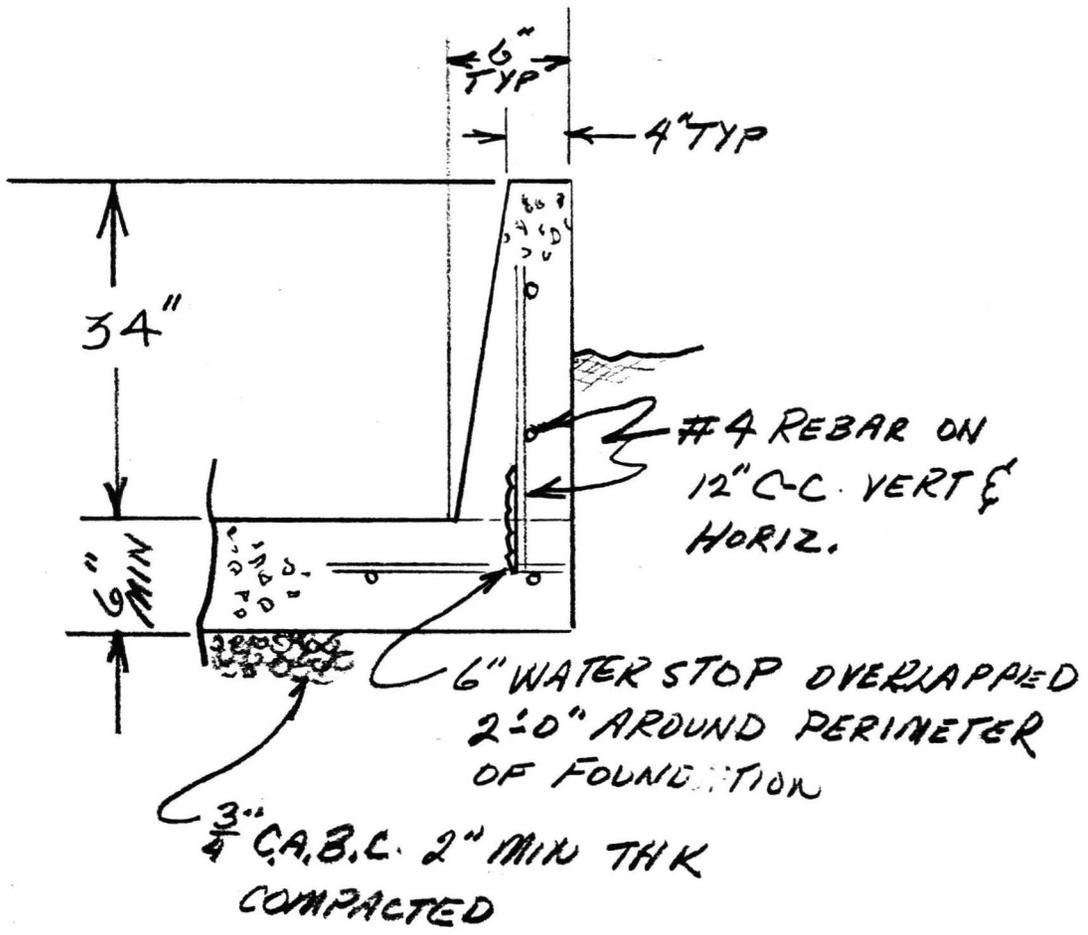
Contents of Tank Calculation

$$\frac{16.5" \times 12 \times 15.5" \times 12 \times 17"}{231 \text{ cubic inches}} = 2700 \text{ gallons}$$

Volume of Solid Calculation

$$\frac{16.5" \times 12 \times 15.5" \times 12 \times 2" \times 8.33 \text{ lbs per gallon}}{231 \text{ cubic inches} \times 2000 \text{ lb per ton}} = 1.3 \text{ tons}$$

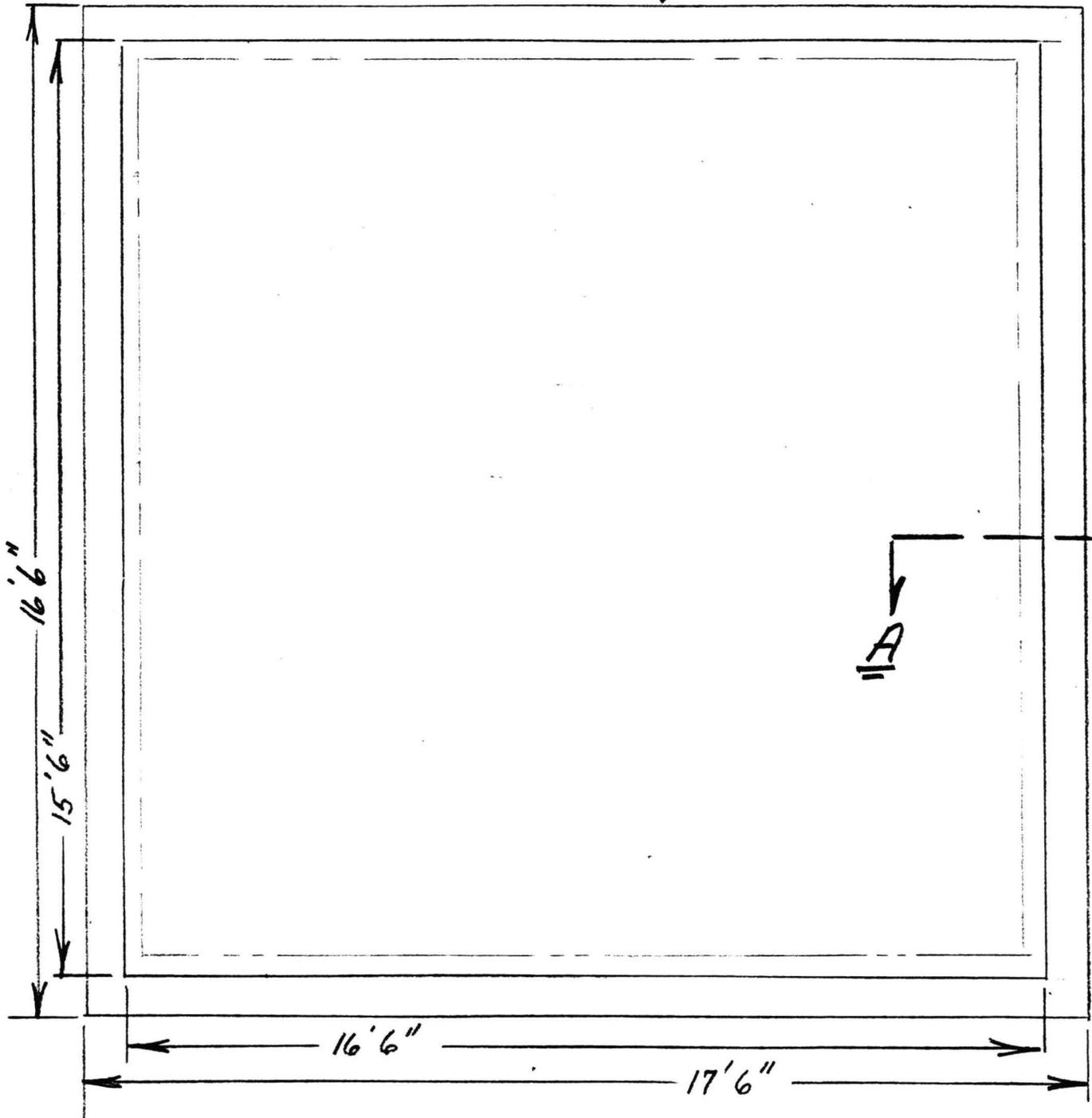
Exhibit 4



SECTION A-A

<h1>EVAPORATION PIT</h1>		
SCALE: NONE	APPROVED BY:	DRAWN BY: <i>PH</i>
DATE:		REVISED
<h2>SOUTHERN AGRICULTURE</h2>		
		DRAWING NUMBER

3000 PSI CONCRETE ↘



DYE, SCOTT & DEITRICH, P.A.

ATTORNEYS AT LAW

1111 THIRD AVENUE WEST

P.O. DRAWER 9480

BRADENTON, FLORIDA 33506

PHONE (813) 748-4411

April 26, 1985

DEWEY A. DYE (1898-1969)

DEWEY A. DYE, JR.
ROBERT L. SCOTT
DAVID K. DEITRICH
PHILIP E. PERREY
C. ROBERT PICKETT
PATRICIA A. PETRUFF
JOHN V. QUINLAN
ALAN M. ORAVEC
STEPHEN R. DYE
T. HARRISON DUKE

Mr. William L. Meyer, Head
Solid and Hazardous Waste Management Branch
Environmental Health Section
North Carolina Department of Human Resources
P.O. Box 2091
Raleigh, North Carolina 27602-2091

Re: Southern Agricultural Insecticides, Inc. Hendersonville
Plant

Dear Mr. Meyer:

This firm represents Southern Agricultural Insecticides, Inc. and has been requested by it to respond to the compliance order and notice of administrative penalty received from your department. Enclosed is check number 006539 in the amount of \$3,000.00 made payable to North Carolina Department of Human Resources as requested in your letter. Also enclosed is a closure plan for the existing tank. By the provision of this plan Southern Agricultural Insecticides, Inc. does not waive any rights which it may have to assert that the material does not constitute a hazardous waste as that term is defined because under certain circumstances the material can be beneficially reused.

Please note that the structure is not a surface impoundment as that term is defined in 40 CFR 260.10; rather, it meets the definition of a tank. A closure plan for a tank has been prepared for your review and approval. Attached to the closure plan is a plan view of the tank. As you can note, the tank is constructed of industrial strength concrete rated at 3000 PSI. During construction, rebar was used for added strength and chemical resistant joiner was used to seal the tank. The floor of the tank is six inches thick and the walls of the tank are four inches thick.

Your letter indicated that evaporation of the liquid in the tank was not an acceptable method of closure. I must respectfully disagree with that statement. The Hazardous and Solid Waste Amendments of 1984 (HSWA) require that all generators, storers and disposers of hazardous waste commence a program to minimize the volume of existing waste. Evaporation is an acceptable method for minimizing volume. In addition, these same amendments direct the EPA to promulgate regulations which will minimize the disposal of containerized liquid hazardous waste in landfills and minimize the presence of free liquids in containerized hazardous waste to be

Mr. William Meyer
April 26, 1985
Page Two.

disposed of in landfills. (Section 201, HSWA of 1984) Use of absorbants is also discouraged. To comply with the intent of these amendments, Southern Agricultural Insecticides, Inc. must be allowed to minimize the amount of hazardous waste by every available method including evaporation. As indicated in the closure plan, Southern Agricultural Insecticides, Inc. is committed to disposing of the entire contents of the tank at a licensed hazardous waste disposal facility within ninety (90) days of approval of this plan.

With regard to the request for groundwater assessment, it appears that this request was tied to the finding that the structure was a surface impoundment and that hazardous waste constituents had the potential to leach into surrounding soil. In this instance the tank is well constructed and well sealed. There is no potential for the contents to leach through the concrete walls or floor. For these reasons, a groundwater assessment plan is not warranted nor is it required by 40 CFR 265. I would be happy to discuss this with you further if you still feel that that is a need for groundwater assessment.

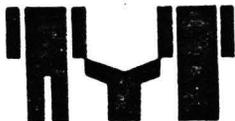
I would appreciate it if you would review this plan in an expeditious fashion so that Southern Agricultural Insecticides, Inc. can close this unit as soon as possible. Representatives of the company will be happy to meet with you to discuss any aspect of the closure plan. In addition, please do not hesitate to contact me if you have any specific questions.

Sincerely,



Patricia A. Petruff

PAP/lrb
enclosure
cc: William E. Diem
John Diem
Robert Diem



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

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

Date: 11/2/84
Inspector: Jerry Rhodes

Section I. General Information

COMPANY NAME: Southern Agriculture Insecticides
Hendersonville (City)
EPA ID No.: _____
INSPECTION/ACTION DATE: 10/31/84
CONTACT: Mr. Ed. Diem
(print)

Section II. RCRA Classification

() Generator; () Transporter; () Interim Status-TSDF; () Final Status-TSDF

Section III. Inspection/Action Classification

() Initial Annual (Gen, Trans.); () Initial Semi-annual (TSDF); () Re-inspection

Section IV. Action Codes

() Compliance Inspection; () Sampling Inspection; () Compliance Order Inspection; () Non-notifier Inspection; () Overview Inspection;
() Complaint Inspection; () Record Review; () Comprehensive Groundwater Evaluation; () Negotiation Meeting; () Informal Settlement Agreement;
() State Order - (Consent, Administrative, etc.); () Hearing; () Penalty Assessed; () Penalty Collected; () Civil Action; () Criminal Action

Section V. Compliance Status

() In Compliance; () In Violation; () All Previous Violation Existing;
() Previous Violations Corrected - But New Ones Exist; () Previous Violation Existing Along With Additional Ones.

Section VI. Letter Action

() NOV; () CO; () In Compliance; () Penalty; () None

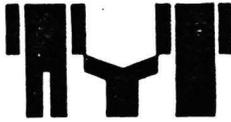
Section VII. Compliance Date

mo/day/yr

FOR RALEIGH OFFICE USE ONLY:

I. () I II. Compliance Order Date
() G
() F
() C
_____ mo/day/yr

DHS 3218 Rev. 10/84
Solid & Hazardous Waste



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

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

November 9, 1984

MEMORANDUM

TO: O. W. Strickland
FROM: Jerry Rhodes *JAR*
SUBJECT: Southern Agriculture Insecticides
P.O. Box 429
Hendersonville, NC 28739

On October 31, 1984 Jim Moore and myself visited Southern Agriculture on a complaint call from pesticides and to see what progress had occurred on cleaning the evaporation pond reported by Jim in the attached memo of February 14, 1984. Jim and I met with Mr. Ed Diem, Plant Manager.

The pond likely contains Endosulfan (P050) and methoxychlor (D014) at low concentrations. However, no analysis had been done. We were told last spring that this pond would be tested. Mr. Diem told us that the pond was to be cleaned very soon with wastewater shipped to the Dupont waste treatment facility in New Jersey. However, when he called on October 30, 1984 to see if they were ready to take the water, he was told the Dupont bacteria were killed when exposed to the pond wastewater. Mr. Diem then called Chem Bac and arranged to ship a sample of pond water and solids for testing for Endosulfan, methoxychlor, and oil and grease. These results should be available in one week. The endosulfan and methoxychlor are the only RCRA wastes expected to be in the pond.

I told Mr. Diem that a report had recently come to us that wastes had been buried on plant property. His statement was that nothing had been buried. We saw no evidence of any burial.

JR:lp

cc: Mr. Jim Moore



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

February 14, 1984

TO: Julian Foscoe
Western Area Supervisor

FROM: Jim Moore
Waste Mgt. Specialist

RE: Investigation of Waste Practices at
Southern Agriculture Insecticides,
Hendersonville, NC

*call fully made 27 Feb
2/24/84*

(704) 692-2233

At your request, I visited Southern Agriculture Insecticides on February 9, 1984 to determine whether or not their waste practices are in compliance with RCRA.

Business started 1980

Ed Diem, Plant Manager, provided me with the enclosed list of chemicals which his plant has used in mixing and/or packaging. The items with slash marks have at one time been used, but are no longer used.

When these chemicals are added to mixers a ventilation system collects the airborne dust and pulls it into sock filters. These sock filters are emptied into a concrete basin, 18'x20'x3'. Mr. Diem estimated approximately 200 pounds/year of these various dusts are collected in the basin which is primarily filled with water which is used to rinse the mixers between batches. There was approximately 45,000 lbs. of water with these various chemicals in the basin on February 9th. The basin was covered with a plastic roof and its walls extended above ground so that overflow seemed very improbable.

*Basin used for 1 yr. - 2 yrs.
Septic Tanks used in past*

It appears that this facility is an unpermitted generator and storer and possibly treater as caustic is added to the basin in an attempt to render the waste inert.

Mr. Diem expressed willingness to take the necessary steps to comply with RCRA.

JWM/dgh

Enclosure

*call from Insecticides 10/25/84
anonymous call that waste is being buried at SE corner of new bldg.
JHR*

Acute Hazardous WASTES

170

1. Cygon - Dimethoate # P044
Cygon SC-9, Technical Cygon - Am. Cyanamid
SA Cygon 2E: Dimethoate Systemic Insecticide
2. Thiodan - Endosulfan # P050
SA Thiodan 4 Dust
SA Thiodan 50 Wettable Powder
SA H. #9. Vegetable Dust
Thiodan 150 - FMC, Landia
3. ~~Lannate - Methomyl # P066~~
~~SA 27% Methomyl Insecticide Dust~~
~~LANNATE 90 S.P. - DuPont~~
~~Nudrin 90 S.P. - Shell~~

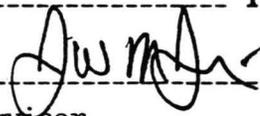
Toxic wastes

1. 2,4-D # U240
SA 2,4-D Amine Weed Killer
SA Brush Killer
SA Lawn Weed Killer
FORMULA 40r - Dow
Brush Buster - Velsicol
Dacamine 2D - Diamond
2. Chlordane # U036
SA Chlordane 4 E.C.
SA 73% Chlordane
Chlordane Technical - Velsicol
3. Lindane # U129
SA Lindane Spray Concentrate
Lanco Lindane 1E - Landia

DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES
ENVIRONMENTAL HEALTH SECTION

Hazardous Waste Disposal at
Southern Agricultural Insecticides

REPORT OF INVESTIGATION OR INSPECTION OF _____

Place visited Southern Agricultural Insecticides Date June 29 1981
Address Hendersonville, NC Time spent 4 hours
By whom J. W. Moore, Jr., District Sanitarian 
Persons contacted Donald Brewer, Production Supervisor
(Owner, agent, tenant, manager, other)
Reason for visit To investigate disposal of drums and hazardous waste by S.A.I.

Copies to:

REPORT:

I talked with Donald Brewer who told me that Moreland, Inc. collected all poisonous drums for recycling until 1 - 1-1/2 years ago. Now these drums have accumulated on the plant property and have not been disposed of. Mr. Brewer indicated that empty drums which had contained such things as kerosene, ziolene, and triton are reused.

Mr. Brewer indicated that no pesticides are disposed of. He stated that routine waste plus dust collected from the atmosphere within the plant is taken to the Henderson County Landfill. He said that this dust amounts to approximately 100 pounds every two-three months.

I suggested that Mr. Brewer inform the plant manager who was ill and not working on the 29th that he should contact our Raleigh office to insure compliance with Division of Health Services "Hazardous Waste Management Rules."

/dgh

RECORD OF COMMUNICATION

PHONE CALL DISCUSSION FIELD TRIP CONFERENCE

OTHER (SPECIFY) Information

(Record of item checked above)

TO: Residuals Management

FROM: *Bill Pfister*
Pesticides Branch
(Pfister)

DATE: 3/18/81
TIME:

SUBJECT: Disposal data pesticide (North Carolina)
From State DA Producer establishment inspection reports

SUMMARY OF COMMUNICATION

The following reports reviewed today showed following data re pesticide and/or pesticide container disposal data for the subject establishments:

<u>Firm & Est No.</u>	<u>Inspected</u>	<u>Disposal data from report</u>
Mineral Research & Development, Concord, N.C. (10465-N C-1) <i>NC D098467427 G, TSD, T</i>	1-7-81 <i>OK</i>	"At this time, Mr. Davis stated that he has 64/55 gallon drums on hand for Disposal, which is a by-product of CCA (copper, chromic acid, and arsenic). Since the last PEI, Mr. Davis has disposed of eight 40,000 lb truck loads of this product. This was about 40,000 containers that has been disposed of".
Southern Agricultural Insecticides, Hendersonville, NC(829-NC-1) <i>no notification needed</i>	12-10-80	"Containers on hand for disposal 61/55 gallon drums metal "containers disposed since last EV 650, paper container. 0 Metal bbls "pesticides disposed since last EV 650 lb floor sweepings"

BACKGROUND

- (1). Mineral Research imports arsenic trioxide powder in drums; manufactures chromated copper-arsenical wood preservatives (CCA types) from chromic acid/copper/AS₂O₃. Last previous PEI 4-5-79. 4-5-79 PEI indicates disposal at S.C.A. in S.C. No triple-rinsing or other environmental pollution data other than above in Pesticide files.
- (2). SAI is a formulator producing a wide variety (low to high toxicity) of about 75 agricultural fungicides, insecticides, herbicides in mostly dry (dust and granular) and some liquid form. Last previous PEI 3-19-80; when 126 metal containers on hand for disposal, per PEI. Other disposal data about like above: paper con-

CONCLUSIONS, ACTION TAKEN OR REQUIRED

tainers (technical bags) & floorsweepings. No triple-rinsing data in files; no environmental pollution report data in files.

For your information. If you do not wish this type information, please advise.

what has SAI been doing with waste pesticides and containers.

INFORMATION COPIES

TO: Original Residuals; Copy "Disposal" file; copy Co. files



Henderson
JFK

STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES

Division of Health Services

JAMES B. HUNT, JR.
GOVERNOR

JACOB KOOMEN, M.D., M.P.H.
DIRECTOR

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

P. O. Box 2091

Raleigh 27602

January 28, 1977

Southern Agricultural Insecticides
P. O. Box 429
Hendersonville, N. C. 28739

Dear Sir:

The management of residual industrial wastes which may be hazardous, potentially hazardous, or hard to handle, such as sludges, semi-solids, liquids, etc., has become a major problem in North Carolina.

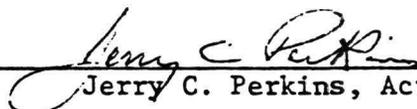
Your assistance is needed to provide the Solid Waste & Vector Control Branch, Division of Health Services, with information on the present status of the management, volume, and composition of these type wastes in North Carolina. This information is needed to develop an orderly and reasonable implementation schedule for Public Law 94-580. The 94th Congress enacted Public Law 94-580 on October 21, 1976. Subtitle C of this Public Law is related to the management of hazardous wastes.

In cooperation with the Environmental Protection Agency, this agency is making a statistical survey of industries in North Carolina to obtain the necessary data for program planning and management of these wastes. A copy of the data collection form is enclosed. It is requested that someone familiar with industrial wastes generated by your facility review the form. The Solid Waste & Vector Control Branch representative that serves your area will contact your company by telephone in the near future to schedule an appointment with your representative so that the data forms may be completed.

If there are questions with reference to this survey, your calls or correspondence should be addressed to:

O. W. Strickland, Program Supervisor
Solid Waste & Vector Control Branch
Division of Health Services
P. O. Box 2091
Raleigh, North Carolina 27602
Telephone: (919)733-2178

Your cooperation is appreciated.


Jerry C. Perkins, Acting Head

Enclosures

cc: Mr. J. W. Moore, Jr.

William



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

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

Ronald H. Levine, M.D., M.P.H.
State Health Director
919/733-3446

March 25, 1985

COMPLIANCE ORDER AND NOTICE OF
ADMINISTRATIVE PENALTY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Diem
Southern Agricultural Insecticides, Inc.
P.O. Box 429
Hendersonville, N.C. 28739

RE: Evaporation Pond at your Hendersonville Plant

Dear Mr. Diem:

This letter and compliance order have to do with the evaporation pond on your Hendersonville plant premises. The pond contains endosulfan and methoxychlor, which are listed as hazardous wastes P05J and D014, respectively under 40 CFR 261, codified at 10 NCAC 10F .0029. It is thus a hazardous waste surface impoundment under the definitions of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Solid Waste Management Act and rules. This pond is not a permitted hazardous waste storage facility, nor does it have interim status under the provisions of the act so that your storage of wastewater containing these pesticides is in violation of the Act and applicable regulations. Specifically, Southern Agricultural Insecticides, Inc. is in violation of 40 CFR 270.1(b) (10 NCAC 10F .0032(a), which states that "any person who treats, stores or disposes of hazardous waste shall do so in conformity with the standards set forth in this rule, and only after having received a permit from the Department as required by 10 NCAC 10F .0034(b)(1) or having received interim status according to 10 NCAC 10F .0034(b)(3)".

Personnel from this Branch have discussed your handling of this wastewater with you on two occasions. Messrs. Moore and Rhodes visited your company on October 31, 1984 in response to a complaint from the Pesticide Section, North Carolina Department of Agriculture. On February 11, 1985 Mr. William Paige wrote to you commenting on your proposed method of closing out your pond. He noted that your plan for evaporating the liquid in it was not acceptable, but agreed that this liquid could be used as a pesticide provided the use was in accordance with recommendations for the use of these two chemicals. He also advised you that your plan for disposal of the soil and sludge was acceptable. However, your proposal did not address the issue of underground water assessment.

Mr. Ed Diem
Page 2
March 25, 1985

To the best of our knowledge, no action has been taken since Mr. Paige wrote to you. Approximately 4½ months have passed since your violation of regulations was called to your attention. Therefore, the Solid and Hazardous Waste Management Branch assess an administrative penalty and issues a compliance order as follows:

Penalty:

An administrative penalty of three thousand dollars (\$3,000.00) is hereby assessed against Southern Agricultural Insecticides, Inc.

This penalty was determined after taking into account the following factors: the possibility that operation of this surface impoundment may have caused contamination of ground water; the fact that failure to comply with regulations may have given your company an unfair economic advantage over companies which complied with regulations; and that compliance was easy to achieve.

Order:

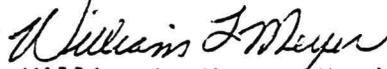
1. Pay the penalty
2. Southern Agricultural Insecticides, Inc. is prohibited from storage, treatment or disposal of this or any other hazardous waste without a hazardous waste permit. (There is no way your company may achieve interim status).
3. Southern Agricultural Insecticides, Inc. is ordered to prepare a closure plan for its impoundment as outlined in 40 CFR 265.228. This plan must be complete and must provide for testing as in 40 CFR 265.228(b) and for ground water assessment. Such plan is to be submitted to this Branch on or before April 27, 1985.
4. Southern Agricultural Insecticides, Inc. shall fully implement the submitted closure plan as finally approved by this Branch. Closure shall be completed within 3 months from the date of final approval.

You may appeal this administrative order within (30) days after you receive this notification by requesting an administrative hearing concerning this matter. The request must be submitted in writing to Mr. William L. Meyer, Head, Solid and Hazardous Waste Management Branch, Division of Health Services, P.O. Box 2091, Raleigh, North Carolina 27602 and it must state the legal and factual issues in dispute including any reason why you contend that the order is in error, the requirements are unreasonable, or both. When a hearing is requested, it shall be in accordance with the rules contained in 10 NCAC 1b .0200, a copy of which is enclosed.

Mr. Ed Diem
Page 3
March 25, 1985

Please call or write either Mr. William Paige or Mr. Keith Lawson
if you have any questions or need additional information.

Very truly yours,



William L. Meyer, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

WLM:nlp

cc: Mr. William Paige
Prentiss Anne Allen
Mr. Keith Lawson
Mr. Jim Moore
Mr. Jerry Rhodes
Mr. Julian Foscue

Enclosure

Jerry



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

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

Ronald H. Levine, M.D., M.P.H.
State Health Director
919/733-3446

March 25, 1985

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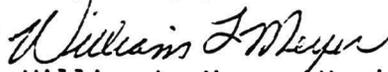
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Mr. Ed Diem
Page 3
March 25, 1985

Please call or write either Mr. William Paige or Mr. Keith Lawson if you have any questions or need additional information.

Very truly yours,



William L. Meyer, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

WLM:nlp

cc: Mr. William Paige
Prentiss Anne Allen
Mr. Keith Lawson
Mr. Jim Moore
Mr. Jerry Rhodes
Mr. Julian Foscue

Enclosure

PENALTY COMPUTATION WORKSHEET
(Use Separate Sheet for Each Violation)

Company Name: Southern Agricultural Insecticides, Inc.
40 CFR 270.1(b): Operating a hazardous waste surface
Regulation Violated: impoundment without a permit or interim status

Part I. Degree or Extent of Harm (actual or potential)

1. Quantity of waste involved 28,000 lbs. at a concentration of 41.4 ppm
High
2. Toxicity of waste involved (from: material data safety sheet
NIOSH X
Toxicologist evaluation
3. Is human life or health potentially threatened? yes no X
Distance to residences est. 1/4 mile
Number of people involved N/A (industrial area)
Media for exposure:
air groundwater surface water direct contact X
4. Are other organisms potentially threatened? yes no X
Media for exposure:
air groundwater surface water direct contact
5. Are any environmental media potentially threatened?
air groundwater X surface water soil yes X no

Harm Cell: Major Moderate Minor X

Part II. Deviation from Regulations

1. Violator is substantially somewhat X not at all in compliance with overall regulations.

Deviation cell: Major X Moderate Minor

MATRIX CELL RANGE:

\$4,000.00 - \$1,500.00

Penalty amount chosen:
Justification for initial
penalty amount chosen:

\$3,000.00

near upper limit because
company was in almost total
violation of regulations.

Per-day assessment:

N/A

PENALTY COMPUTATION WORKSHEET
PAGE TWO

Part III. Penalty Adjustments (optional)

	<u>Percentage change</u>	<u>Dollar Amount</u>
1. Good faith efforts to comply/lack of good faith:	_____	_____
2. Degree of willfulness/neglect:	_____	_____
3. History of noncompliance/compliance:	_____	_____
4. Other unique factors:	_____	_____
5. Justification for adjustments:	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____
6. Adjusted initial penalty (amount from page one +/- adjustments)		_____
7. Adjusted per-day penalty (amount from page one +/- adjustments)		_____
8. Number of days of Violation		_____
9. Multi-day penalty (line 7 x line 8)		_____
10. Economic benefit of noncompliance (attach separate worksheet)		_____
11. Total (lines 6 + 9 + 10)		_____
12. Ability to pay adjustment Justification:	_____	_____
	_____	_____
	_____	_____
13. Total Penalty Amount: (may not exceed \$10,000 per day of violation)		_____



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

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

Ronald H. Levine, M.D., M.P.H.
State Health Director
919/733-3446

January 30, 1985

MEMORANDUM

TO: John Hunter

FROM: William Paige 

Attached please find a copy of the information concerning Southern Agriculture Insecticides (Hendersonville). I would like to know application rate, frequency, etc. for re-use of the wastewater if you have no objection.

If the water can be re-used, my Agency will require proper disposal of the sludge and ground water assessment.

WP:lp

Enclosure



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

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

November 9, 1984

MEMORANDUM

TO: O. W. Strickland
FROM: Jerry Rhodes *JHR*
SUBJECT: Southern Agriculture Insecticides
P.O. Box 429
Hendersonville, NC 28739

On October 31, 1984 Jim Moore and myself visited Southern Agriculture on a complaint call from pesticides and to see what progress had occurred on cleaning the evaporation pond reported by Jim in the attached memo of February 14, 1984. Jim and I met with Mr. Ed Diem, Plant Manager.

The pond likely contains Endosulfan (P050) and methoxychlor (D014) at low concentrations. However, no analysis had been done. We were told last spring that this pond would be tested. Mr. Diem told us that the pond was to be cleaned very soon with wastewater shipped to the Dupont waste treatment facility in New Jersey. However, when he called on October 30, 1984 to see if they were ready to take the water, he was told the Dupont bacteria were killed when exposed to the pond wastewater. Mr. Diem then called Chem Bac and arranged to ship a sample of pond water and solids for testing for Endosulfan, methoxychlor, and oil and grease. These results should be available in one week. The endosulfan and methoxychlor are the only RCRA wastes expected to be in the pond.

I told Mr. Diem that a report had recently come to us that wastes had been buried on plant property. His statement was that nothing had been buried. We saw no evidence of any burial.

JR:lp

cc: Mr. Jim Moore

Southern Agricultural Insecticides, Inc.

BOONE, N. C. 28607

POST OFFICE BOX 429
HENDERSONVILLE, N. C. 28739
TELEPHONE 704/692-2233

PALMETTO, FLORIDA 33561

SA-50 BRAND

Trade Mark Registered

December 18, 1984



Jerry H. Rhodes
Environmental Chemist
N.C. Department of Human Resources
P.O. Box 2091
Raleigh, NC 27602-2091

Dear Mr. Rhodes:

You will find attached a copy of the analysis of our evaporation pool. Please consider the actual amount of chemical.

$15 \text{ ft.} \times 15 \text{ ft.} = 450 \text{ ft.}^3 \times 62.4 \text{ lb./ft.}^3 = 28,080 \text{ lbs. water}$

$\text{Endosulfan} = 14.4 \text{ ppm} \times \frac{28,080 \text{ lbs.}}{1,000,000 \text{ lbs.}} = .4 \text{ lb. active}$

$\text{Methoxychlor} = 27.0 \text{ ppm} \times \frac{28,080 \text{ lbs.}}{1,000,000 \text{ lbs.}} = .76 \text{ lb. active}$

In agricultural terms, there would be enough Endosulfan to treat .1 acre of apples and enough Methoxychlor to treat 12 cows.

We do not feel that the water in the pool creates an environmental hazard.

We would like to propose the following plan. Evaporate the water in the pool until it reaches the point of being solid waste. We would then drum the material and send it to the SCA facility in South Carolina.

We are in the process of finding a farmer to spray our wash water from the mixes containing these compounds.

Thank you for your cooperation.

Yours truly,

William W. Diem
Vice-President/Manager

SOUTHERN AGRICULTURAL INSECTICIDES, INC.

CHEM-BAC *Laboratories, Inc.*

• P. O. BOX 19198, CHARLOTTE, N. C. 28219
TEL. 394-6382

November 20, 1984

REF: 1452

Analyses of Wastewater

MADE FOR: Southern Agricultural Insectides
P.O. BOX 429
Hendersonville, N.C. 28739

MARKED: Sample received at Chem-Bac Labs, Inc. on
11/02/84

ANALYSIS: Endosulfan I ----- 2.80 ug/gm(ppm)
Endosulfan II ----- 11.60 ug/gm(ppm)
Methoxychlor ----- 27.0 ug/gm(ppm)

Respectfully submitted,
CHEM-BAC LABORATORIES, INC.

J.C. Hubbell
Supervising Chemist



NORTH CAROLINA
DEPARTMENT OF HUMAN RESOURCES
INTER OFFICE MEMORANDUM

DATE 1-10-85

TO Bob

FROM Wm

Wells

1-up

2-down

Please look over this and then
see me. I need some g.w.
assistance.*

My questions center around
the following issues:

- * (1) g.w. Contamination(?)
- (2) beneficial re-use letter
required for ~~water~~ desired
usage of w. water, if allowed
- (3) Pond closure / remedial
Plan needed of some type.
- (4) need to send a
letter requiring that
this activity cease.
- (5) etc.

William



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

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

Ronald H. Levine, M.D., M.P.H.
State Health Director
919/733-3446

February 11, 1985

Mr. Ed Diem
Southern Agricultural Insecticides, Inc.
P.O. Box 429
Hendersonville, N.C. 28739

RE: Evaporation Pond
(Hendersonville)

Dear Mr. Diem:

On October 31, 1984 Messrs. Jim Moore and Jerry Rhodes of this office visited the above referenced site in response to a complaint. The complaint alleged that waste was buried on plant property. According to you, no disposal had occurred.

During the complaint investigation, it was learned that the evaporation ponds' wastewater was unacceptable for treatment at Dupont's facility located in New Jersey. In a December 18, 1984 letter to Mr. Rhodes, you proposed to evaporate the wastewater and then dispose of the sludge and contaminated soil at GSX (formally SCA, South Carolina). Your proposal to evaporate the wastewater is unacceptable; however, the intended sludge and soil disposal is acceptable. This Agency will; however, approve the re-use of the wastewater if the only chemicals in it is endosulfan and methoxychlor and it is used for one of its initially intended purposes. According to the North Carolina Department of Agriculture, these chemicals are commonly applied to broccoli, cabbage, cucumbers, squash, melons, peaches, tomatoes, and similar crops. The re-use must be in accordance with the suggested application rate, etc. as described on the label.

I request that you notify this office by March 1, 1985 of your intent. During this period, you should also contact Mr. Gary Babb, Geologist, of this office concerning the location of ground water monitoring wells which are required of all impoundments containing hazardous waste.

If you have any questions concerning this matter, please let me know.

Sincerely,

William Paige, Environmental Engineer
Solid & Hazardous Waste Management Branch
Environmental Health Section



State of North Carolina
Department of Agriculture
Raleigh

JAMES A. GRAHAM
COMMISSIONER
WILLIAM G. PARHAM, JR.
DEPUTY COMMISSIONER

27611

February 5, 1985

FOOD AND DRUG PROTECTION
DIVISION
L. F. BLANTON
DIRECTOR
R. L. GORDON
DEPUTY DIRECTOR



Mr. William Paige
Solid and Hazardous Waste Branch
Bath Building
Raleigh, North Carolina 27602

Re: So. Ag. Insecticides
Hendersonville

Dear Mr. Paige:

We have received your request for application rates for the endosulfan and methoxychlor in the wastewater of Southern Agricultural Insecticides evaporation pond. We have endorsed copies of registered labels which may be used to determine proper uses and rates for the pesticides as analyzed by Chem-Bac Laboratories, Inc.

These labels indicate registered uses for the two pesticides but do not include any other pesticides which may be in the water solution.

If you have any questions or need labels for other pesticides in the solution, please contact this office.

Sincerely,

John E. Hunter, III
Assistant Pesticide Administrator

JEH:1jj

Enclosures

Southern Agricultural Insecticides, Inc.

SA-50 BRAND® PESTICIDES

PALMETTO, FLORIDA 33561
P. O. BOX 218
TELEPHONE 813/722-3285

HENDERSONVILLE, N. C.
TELEPHONE 704/692-2233

BOONE, N. C.
TELEPHONE 704/264-8843

SA-50® BRAND

THIODAN® 50 WETTABLE POWDER

ACTIVE INGREDIENTS:
 * Endosulfan (6,7,8,9,10-hexachloro-1,5,5a,6,9,9a-hexahydro-6,9-methano-2,4,3-benzodioxathiepin-3-oxide) 50%
 INERT INGREDIENTS 50%
 * U. S. Patent No. 2,799,685 100%

FOR USE ON THE FOLLOWING CROPS

Unless otherwise indicated, dosages are given in pounds per acre. Apply with enough water to obtain thorough coverage.
Broccoli and Cabbage for the control of cabbage aphids, cabbage looper, flea beetle, harlequin bug and stink bug. Apply to foliage at weekly intervals beginning when true leaves appear, using 1½ to 2 lbs. per acre. Do not apply within 7 days of harvest.
Cucumbers, Squash, Melons, and Pumpkins for the control of aphids and cucumber beetles. Apply to foliage as needed using 1 to 2 lbs. per acre. Watermelon for the control of cabbage looper. Apply as needed using 2 lbs. per acre. There is no time limitation between last application and harvest for cucumber, squash, pumpkin and watermelons.

Chrysanthemums to control aphids. Apply as needed to obtain thorough coverage using 1 lb. per 100 gals. Apply before blooms begin to open. Commercial Growers should check varietal tolerance before using Thiodan on any particular variety.

Peaches for the control of peach tree borer and lesser peach tree borer in Southern States. Spray all bark from ground to scaffold limbs, using 1½ lbs. per 100 gallons, immediately after harvest. Repeat application in 3 to 4 weeks. If lesser borer is a problem, spray main branches as well and make first application when adults appear. Repeat application as indicated for peach tree borer. Do not apply more than twice during the fruiting period. Do not allow animals to graze in treated orchards. Do not apply within 30 days of harvest.

Tobacco (plant beds) for the control of aphids and budworms. Apply as soon as insects appear. Use 1 lb. per 100 gallons of water and apply at a rate of 3 gallons of finished spray per 100 sq. yards.
Tobacco (in field) for control of aphids, budworm and hornworm. Apply to foliage as needed using 1 to 2 lbs. per acre. Workers entering treated area within 24 hours of treatment should wear protective clothing. Do not apply within 5 days of harvest.

Tomatoes and Eggplant for the control of aphids, blister beetle, Colorado potato beetle, flea beetle and green stink bug. Apply 1 lb. per acre, when insects appear and repeat as needed. For tomato fruit worm control on tomato only, apply 2 lbs. per acre when fruit begins to set and repeat at 7 day intervals. Do not exceed 1 lb. per acre on eggplant or 2 lbs. per acre on tomato. Do not apply within 1 day of harvest.

KEEP OUT OF REACH OF CHILDREN

WARNING: Hazardous if swallowed, inhaled, or absorbed through skin. Do not breathe spray mist. Do not get in eyes, on skin or on clothing. In case of contact, immediately remove contaminated clothing and flush skin or eyes with plenty of water; for eyes, get medical attention. Wash thoroughly with soap and water after handling and before eating or smoking; wear clean clothing. During commercial or prolonged exposure in spray-mixing and loading operations, wear clean synthetic rubber gloves and a mask or respirator of a type approved by the U. S. Bureau of Mines for Thiodan protection. Workers entering treated areas on the day of application should wear protective clothing.

Not for use or storage in or around the home.
 This product is toxic to fish and wildlife. Birds feeding on treated areas may be killed. Keep out of any body of water. Do not apply when weather conditions favor drift from area treated. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning of equipment, or disposal of wastes. Apply this product only as specified on this label. This product is toxic to bees and should not be applied when bees are actively visiting the area.

Timing and method of applications, weather conditions, mixtures with other chemicals, and other influencing factors are beyond control of the seller. Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with the directions and precautions given herewith.

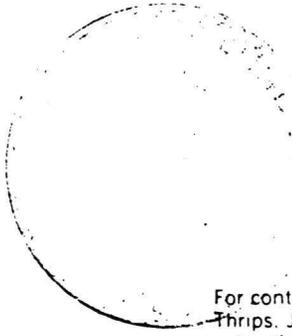
EPA EST 829-F1-1 (3); 829-NC-1 (4); 829-NC-2 (5) Number following Est. No. Corresponds to first digit in Lot No. on bottom of bag.

Southern Agricultural Insecticides, Inc.

Palmetto, Fla. Boone, N. C. Hendersonville, N. C.
 EPA Reg. No. 829-154 Net Weight: 4 lbs.

Revised 1978 JWB

New 1982
7/16/82
kg



MARLATE[®] 50

INSECTICIDE

WETTABLE POWDER

For Dairy And Beef Cattle & Certain Other Livestock

Crops • Buildings • Ornamentals

ACTIVE INGREDIENT:

*Methoxychlor, Technical	50%
INERT INGREDIENTS	50%

*Methoxychlor, Technical is equivalent to 44% 2,2-bis (p-methoxyphenyl) 1,1,1-trichloroethane and 6% other isomers and reaction products.

CAUTION: Keep out of reach of children.

Wash thoroughly after handling.

IMPORTANT—This product is toxic to bees and should not be applied when bees are actively visiting the area. Do not re-use bag; bury when empty. This product is toxic to fish. Keep out of lakes, streams or ponds. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment, or disposal of wastes.



NET 50 LBS.

REG NO 41014 2

EPA EST. 42761 MS 1

KINCAID ENTERPRISES, INC.

P.O. BOX 671, NITRO, WEST VIRGINIA 25143

FLOWERS, ORNAMENTALS

For control of Blister Beetles, Cankerworms, Cucumber Beetles, Thrips, Japanese Beetle, Leafhoppers, Rose Chafer, Rose Slugs. Use 2 to 3 lbs. per 100 gals. of water, or 2 tablespoonfuls per gal.; spray thoroughly when insects first appear and repeat at 7 to 14-day intervals or as needed.

SHADE TREES AND SHRUBS

For control of Tent Caterpillars, Cankerworms, Japanese Beetle. Use 2 to 3 lbs. per 100 gallonfuls per gal.; spray thoroughly to runoff. Begin application at first sign of infestation and repeat at 7 to 14-day intervals as needed.

LIVESTOCK

DAIRY CATTLE—Direct Dusting for Control of Hornflies on animal. Sprinkle on poll, neck (top and sides), and back and powder beneath the hair. Repeat treatment every 3 weeks as needed.

BEEF CATTLE; SHEEP; SWINE; NON-LACTATING GOATS—For control of Hornflies. Use 2 to 3 lbs. per 100 gallons as needed; may be used on young dairy animals up to 1 year of age.

Spray or Dip—Use 2 lbs. in 25 gals. of water. As a spray wet tail louse of cattle, use 4 to 6 lbs. in 25 gals. of water and apply to tail and dock. Do not dip calves under one month of age.

Direct Dusting—Dust animal thoroughly; rub in lightly to facilitate dust penetration on sheep, following shearing, gives temporary relief from itching.

AGRICULTURAL CROPS

Apply "Marlate" 50 at recommended rates as a spray with equipment to thoroughly cover foliage and fruit. Mix "Marlate" 50 in water using equipment to be used (for example, 5 to 20 gals. per acre for backpack sprayers and greater amounts for high volume sprayers). Control the material in suspension. For small areas, use 2 tablespoonfuls per gallon and apply as a thorough coverage spray.

Note: "Marlate" 50 may also be used as a dust by diluting with water or pyrophyllite. Use equivalent rates of "Marlate" 50 per acre.

Begin application at first sign of infestation (for fruits, begin application at 7 to 14-day intervals or as needed. Do not apply to crops within the harvest period or grazing as shown by PHL (preharvest limitation).

FORAGE AND FIELD CROPS

ALFALFA, CLOVER, COWPEA, FORAGE GRASS—Control Alfalfa Weevil (larvae), Clover Leaf Weevil, Blister Beetles, Leafhopper, Beetles, Webworms, Armyworm, Fall Armyworm, Cowpea Curculionid, Pea Weevil, Spittlebugs, Velvet Bean Caterpillar: 2 to 6 lbs. per acre. PHL: 7 days.

PEANUT, SOYBEAN—Velvet Bean Caterpillar, Mexican Bean Beetle, Garden Webworm, Alfalfa Webworm, Cowpea Curculionid: 6 lbs. per acre. PHL: 7 days.

FRUITS

APPLE, PEAR, QUINCE—Apple Maggot, Codling Moth, Tent Caterpillars: 7 1/2 to 15 lbs. per acre, or 2 to 3 lbs. per 100 gal. of water. PHL: 7 days.

APRICOT, CHERRY, NECTARINE, PEACH, PLUM—Cherry Fruitflies, Japanese Beetle, Plum Curculionid, Rose Chafer: 2 to 3 lbs. per 100 gal. of water at 350 to 400 gals. per acre. PHL: 21 days for apricots, nectarines, peaches.

Southern Agricultural Insecticides, Inc.

BOONE, N. C. 28607

POST OFFICE BOX 429
HENDERSONVILLE, N. C. 28739
TELEPHONE 704/692-2233

PALMETTO, FLORIDA 33561

SA-50 BRAND

Trade Mark Registered

Feb. 27, 1985

Mr. William Paige
Environmental Engineer
N.C Dept. of Human Resources
Division of Health Services
P. O. Box 2091
Raleigh, NC 27602-2091



Dear Mr. Paige:

In response to your letter of February 11, I am enclosing the drawings of our evaporation structure and the new blower system which we have installed at our Hendersonville facility.

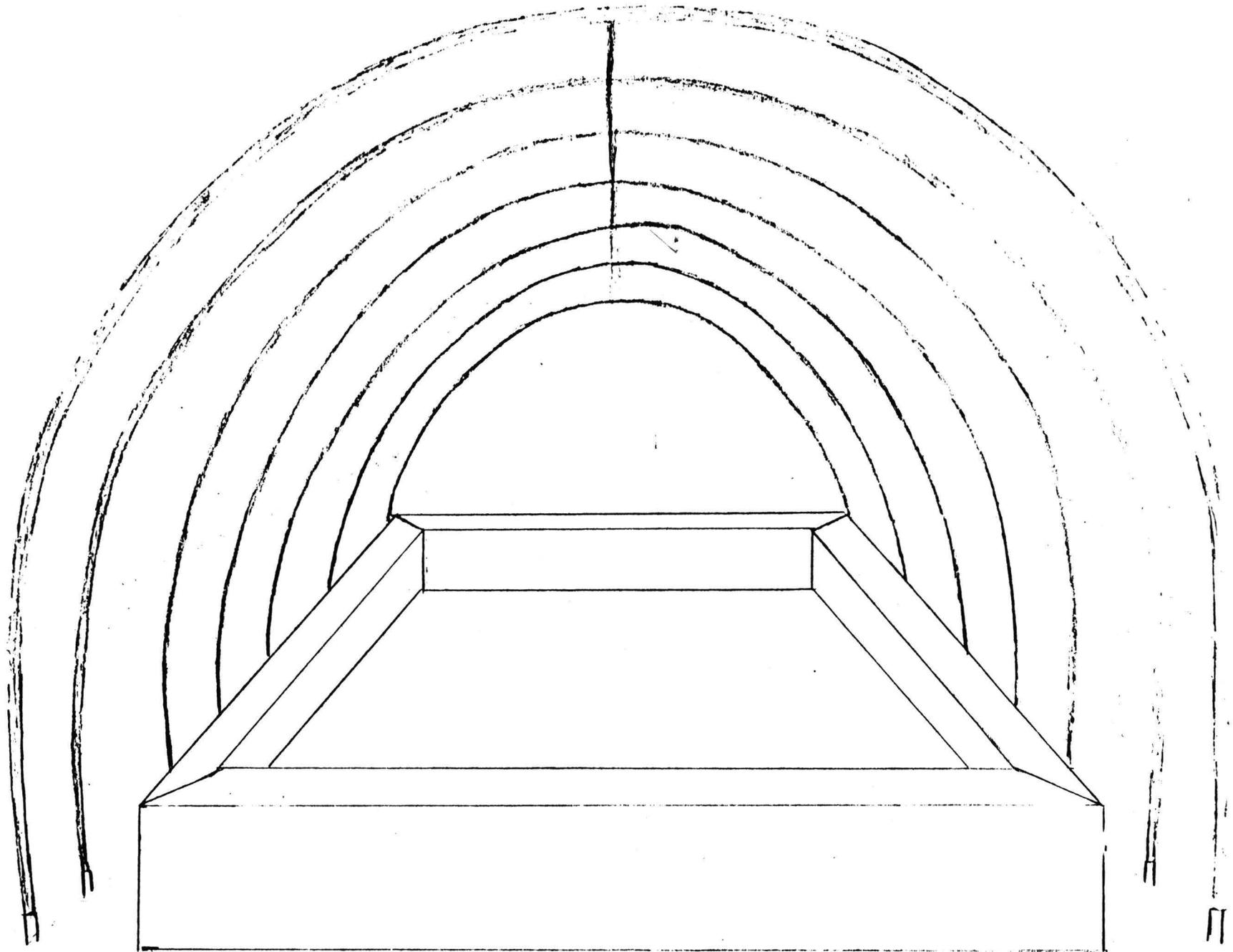
This new blower system will speed up the evaporation process of the liquid waste allowing us to drum up the material much sooner and more efficiently for disposal at the SCA facility in South Carolina.

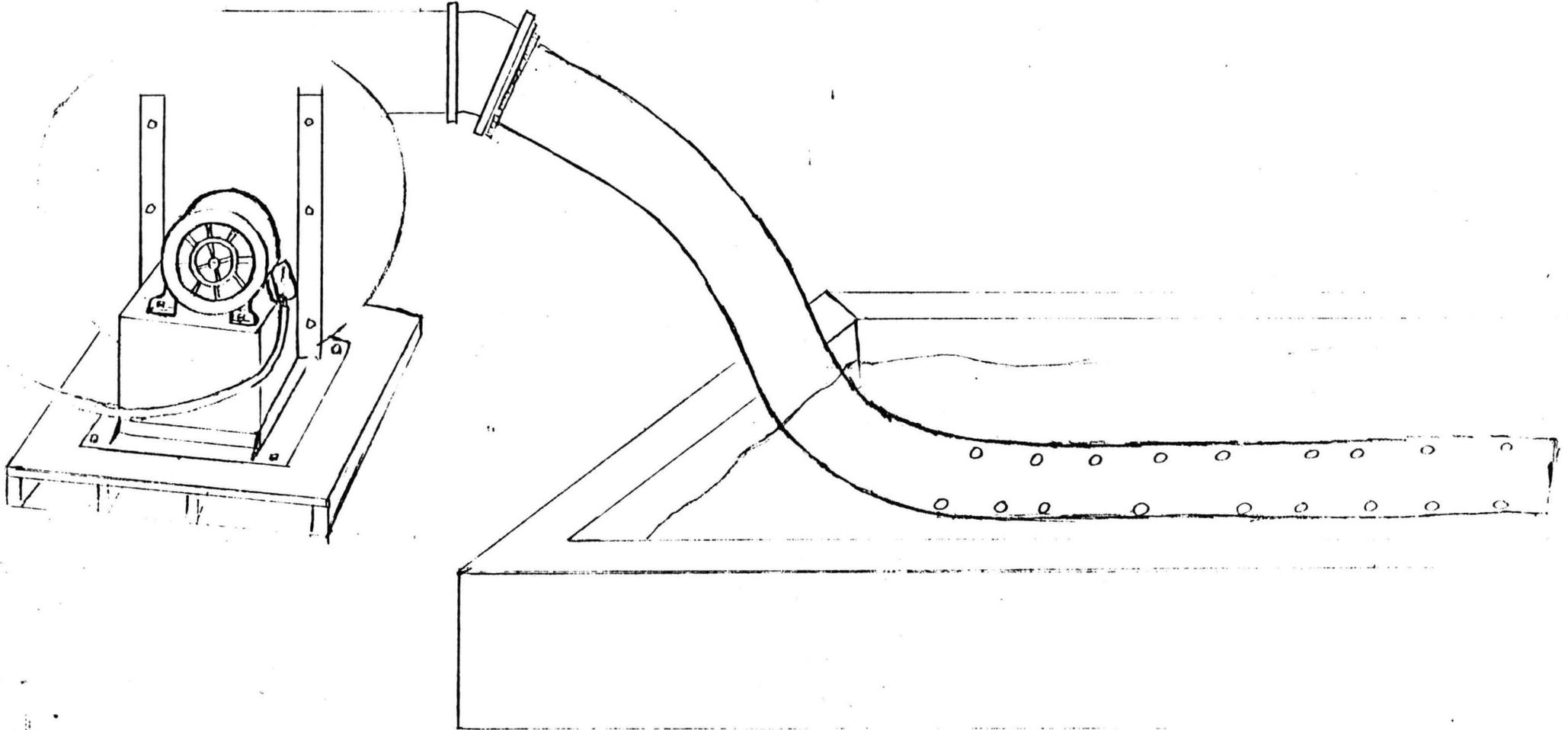
Sincerely,

A handwritten signature in cursive script that reads "William E. Diem".

William E. Diem
Vice-President/Manager

SOUTHERN AGRICULTURAL INSECTICIDES, INC.





Southern Agricultural Insecticides, Inc.

BOONE, N. C. 28607

POST OFFICE BOX 429
HENDERSONVILLE, N. C. 28739
TELEPHONE 704/692-2233

PALMETTO, FLORIDA 33561

SA-50 BRAND

Trade Mark Registered

Feb. 28, 1985

Mr. William Paige
Environmental Engineer
N.C. Dept. of Human Resources
Division of Health Services
P. O. Box 2091
Raleigh, NC 27602-2091



Dear Mr. Paige:

Please find enclosed the material data safety sheet on the Blazon Blue Spray Pattern (dye) which we use in some of our formulations. I am sending this information per your request and conversation with Mr. John Diem.

Thank you for your cooperation and let us know if there is anything further we need to submit to you.

Sincerely,

William E. Diem (CF)

William E. Diem

W.E.

SOUTHERN AGRICULTURAL INSECTICIDES

MILLIKEN CHEMICAL
DIVISION OF MILLIKEN & COMPANY
P.O. BOX 817 INMAN SC 29349

ACCEPTED BY OSHA AS ESSENTIALLY
SIMILAR TO OSHA FORM 20

FORM: B12
MATERIAL SAFETY DATA SHEET

SUPERSEDES PREVIOUS
MSDS DATED: / /

EMERGENCY PHONE: 803-472-9041

CHEMTREC 1-800-424-9300

CHEMICAL NAME:

NFPA CODE:

CHEMICAL FAMILY: TRIPHENYLMETHANE

FIRE

TRADE NAME: BLAZON SPRAY PATTERN
INDICATOR - BLUE

HEALTH < 0 X 0 > REACTIVITY

SYNONYMS:

SPECIAL

FORMULA: POLYMERIC DYESTUFF

HAZARD RATING

DOT CLASS: NON-HAZARDOUS

4- EXTREME 1- SLIGHT
3- HIGH 0- INSIGNIFICANT
2- MODERATE
*- CHRONIC HEALTH HAZARD

EPA HAZARD CODE:

I. PHYSICAL DATA

BOILING POINT(760 MM HG) (°F)	215 °F
SPECIFIC GRAVITY (WATER - 1)	1.116
VAPOR DENSITY (AIR - 1)	1
VAPOR PRESSURE (AT 20 °C), (MM HG)	APPROX 18
SOLUBILITY IN WATER (% BY WEIGHT AT 20 °C)	COMPLETE
EVAPORATION RATE (WATER - 1)	APPROX 1
PERCENT VOLATILES (BY VOLUME AT 70°F)	60 %
MOLECULAR WEIGHT:	2080 GAW

APPEARANCE AND ODOR: DARK BLUE AQUEOUS LIQUID

II. HAZARDOUS INGREDIENTS

MATERIAL	%	TLV (UNITS)
N/A		

III. FIRE & EXPLOSION HAZARD DATA

FLASH POINT / TEST METHOD: > 500 °F (> 260 °C)

AUTOIGNITION TEMPERATURE : N/A

FLAMMABLE LIMITS IN AIR, % BY VOLUME : UPPER- N/A
 LOWER- N/A

EXTINGUISHING MEDIA	N/A
----------------------------	-----

SPECIAL FIRE FIGHTING PROCEDURES	N/A
---	-----

UNUSUAL FIRE OR EXPLOSION HAZARDS	N/A
--	-----

IV. PHYSIOLOGICAL & HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE : ACUTE LD 50 FOR RATS > 5000 MG/KG

EFFECT OF EXPOSURE

ACUTE:

EYES:

SKIN: REPEATED SKIN CONTACT IS MINIMALLY IRRITATING.

RESPIRATORY: INHALATION SHOULD NOT BE A PROBLEM.

CHRONIC:

SENSITIZATION PROPERTIES:

SKIN: YES NO UNKNOWN

RESPIRATORY: YES NO UNKNOWN

MEDIAN LETHAL DOSAGE: LD50, LC50 (SPECIES)

ORAL: > 5000 MG/KG (RATS)

INHALATION:

DERMAL:

OTHER:

IRRITATION INDEX; ESTIMATION OF IRRITATION (SPECIES)

SKIN:*

EYES:*

SYMPTOMS OF EXPOSURE:

***DRAIZE SCALE INDEX**

 ***** V. EMERGENCY & FIRST AID DATA *****

FIRST AID:

EYES: FLUSH IMMEDIATELY WITH WATER. GET MEDICAL ATTENTION.

SKIN: FLUSH WITH WATER.

INGESTION:

INHALATION:

OTHER INSTRUCTIONS:

VI. REACTIVITY DATA

STABILITY: UNSTABLE STABLE XXXX

CONDITIONS TO AVOID: NONE

**INCOMPATIBILITY:
 (MATERIALS TO BE AVOIDED)**

STRONG AKALINES OR BASES.

**HAZARDOUS DECOMPOSITION
 PRODUCTS:**

NONE

HAZARDOUS POLYMERIZATION

MAY OCCUR

WILL NOT OCCUR XXXX

CONDITIONS TO AVOID: NONE

VII. SPILL OR LEAK PROCEDURE

STEPS TO BE TAKEN IN CASE OF RELEASE OR SPILL

SMALL SPILL: SMALL SPILLS CAN BE WASHED AWAY WITH WATER.

LARGE SPILL: CONTAIN SPILL AND PUMP INTO SALVAGE CONTAINER.

RECOMMENDED WASTE DISPOSAL METHOD(S): INCINERATE IN FURNANCE. ALL DISPOSAL MUST COMPLY WITH LOCAL, STATE AND FEDERAL REGULATIONS.

VIII. SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: NONE REQUIRED.

VENTILATION:

LOCAL EXHAUST:

MECHANICAL: N/A

SPECIAL:

OTHER: N/A

PROTECTIVE GLOVES: N/A

EYE PROTECTION: GOGGLES

OTHER PROTECTIVE EQUIPMENT: N/A

IX. SPECIAL PRECAUTIONS

DATE PREPARED: 3/7/83

CODE: B12

APPROVAL:

THE MANUFACTURER IS NOT RESPONSIBLE FOR ANY RESULTS ARISING FROM MISUSE OF THIS PRODUCT. IF NOTED ABOVE THAT THIS PRODUCT CONTAINS HAZARDOUS INGREDIENTS AND/OR IS SUBJECT TO HAZARD BY FIRE OR EXPLOSION, THEN WE URGE YOU TO FULLY DISCLOSE THIS HAZARDOUS POTENTIAL AND SUGGESTED HANDLING PROCEDURES AND PRECAUTIONS TO ALL THOSE WHO MAY USE, HANDLE, COME IN CONTACT WITH, OR MAY BE OTHERWISE EXPOSED TO THIS PRODUCT, EITHER IN THE PROCESSING, MANUFACTURING, STORAGE, DISTRIBUTION OR CONSUMPTION OF THIS PRODUCT.

THE INFORMATION CONTAINED HEREIN IS PROVIDED FOR THE PURPOSE OF DISCLOSING PRODUCT HAZARDS AND DOES NOT CONSTITUTE PRODUCT SPECIFICATIONS REGARDING WHICH ANY WARRANTIES ARE EXPRESSED OR IMPLIED.

REFERENCES AND EXPLANATIONS:



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

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

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

May 23, 1985

Ms. Patricia A. Petruff
Dye, Scott and Deitrich, P. A.
111 Third Avenue West
PO Box Drawer 9480
Bradenton, Florida 33506

Dear Ms. Petruff:

Thank you for your letter, of April 26, 1985 to Mr. William Meyer, with the check and closure plan for Southern Agricultural Insecticide's tank at Hendersonville, NC.

Our personnel agree that the construction of this tank is such that extensive leakage is probably unlikely. However, Mr. Jerry Rhodes of our office observed on one occasion that water seemed to be flowing out of it, therefore we are hereby asking Southern Agricultural Insecticide's to supply our office with analyses of soil samples from representative points around this tank, taken at several depths, to demonstrate that there has been no soil contamination.

In other respects we agree that your closure plan is adequate and Southern Agricultural Insecticide's may proceed to implement it.

You should advise them, of course, that discovery of soil contamination will result in a need for more extensive testing and for removal of affected soil.

Please call our office at (919) 733-2178 if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Keith Lawson".

Keith Lawson

KL/tca/2733A



Jim Moore

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

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

Ronald H. Levine, M.D., M.P.H.
State Health Director
919/733-3446

March 25, 1985

COMPLIANCE ORDER AND NOTICE OF
ADMINISTRATIVE PENALTY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Diem
Southern Agricultural Insecticides, Inc.
P.O. Box 429
Hendersonville, N.C. 28739

RE: Evaporation Pond at your Hendersonville Plant

Dear Mr. Diem:

This letter and compliance order have to do with the evaporation pond on your Hendersonville plant premises. The pond contains endosulfan and methoxychlor, which are listed as hazardous wastes P050 and D014, respectively under 40 CFR 261, codified at 10 NCAC 10F .0029. It is thus a hazardous waste surface impoundment under the definitions of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Solid Waste Management Act and rules. This pond is not a permitted hazardous waste storage facility, nor does it have interim status under the provisions of the act so that your storage of wastewater containing these pesticides is in violation of the Act and applicable regulations. Specifically, Southern Agricultural Insecticides, Inc. is in violation of 40 CFR 270.1(b) (10 NCAC 10F .0032(a), which states that "any person who treats, stores or disposes of hazardous waste shall do so in conformity with the standards set forth in this rule, and only after having received a permit from the Department as required by 10 NCAC 10F .0034(b)(1) or having received interim status according to 10 NCAC 10F .0034(b)(3)".

Personnel from this Branch have discussed your handling of this wastewater with you on two occasions. Messrs. Moore and Rhodes visited your company on October 31, 1984 in response to a complaint from the Pesticide Section, North Carolina Department of Agriculture. On February 11, 1985 Mr. William Paige wrote to you commenting on your proposed method of closing out your pond. He noted that your plan for evaporating the liquid in it was not acceptable, but agreed that this liquid could be used as a pesticide provided the use was in accordance with recommendations for the use of these two chemicals. He also advised you that your plan for disposal of the soil and sludge was acceptable. However, your proposal did not address the issue of underground water assessment.

Mr. Ed Diem
Page 2
March 25, 1985

To the best of our knowledge, no action has been taken since Mr. Paige wrote to you. Approximately 4½ months have passed since your violation of regulations was called to your attention. Therefore, the Solid and Hazardous Waste Management Branch assess an administrative penalty and issues a compliance order as follows:

Penalty:

An administrative penalty of three thousand dollars (\$3,000.00) is hereby assessed against Southern Agricultural Insecticides, Inc.

This penalty was determined after taking into account the following factors: the possibility that operation of this surface impoundment may have caused contamination of ground water; the fact that failure to comply with regulations may have given your company an unfair economic advantage over companies which complied with regulations; and that compliance was easy to achieve.

Order:

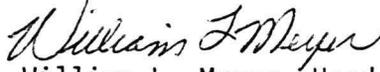
1. Pay the penalty
2. Southern Agricultural Insecticides, Inc. is prohibited from storage, treatment or disposal of this or any other hazardous waste without a hazardous waste permit. (There is no way your company may achieve interim status).
3. Southern Agricultural Insecticides, Inc. is ordered to prepare a closure plan for its impoundment as outlined in 40 CFR 265.228. This plan must be complete and must provide for testing as in 40 CFR 265.228(b) and for ground water assessment. Such plan is to be submitted to this Branch on or before April 27, 1985.
4. Southern Agricultural Insecticides, Inc. shall fully implement the submitted closure plan as finally approved by this Branch. Closure shall be completed within 3 months from the date of final approval.

You may appeal this administrative order within (30) days after you receive this notification by requesting an administrative hearing concerning this matter. The request must be submitted in writing to Mr. William L. Meyer, Head, Solid and Hazardous Waste Management Branch, Division of Health Services, P.O. Box 2091, Raleigh, North Carolina 27602 and it must state the legal and factual issues in dispute including any reason why you contend that the order is in error, the requirements are unreasonable, or both. When a hearing is requested, it shall be in accordance with the rules contained in 10 NCAC 1b .0200, a copy of which is enclosed.

Mr. Ed Diem
Page 3
March 25, 1985

Please call or write either Mr. William Paige or Mr. Keith Lawson
if you have any questions or need additional information.

Very truly yours,



William L. Meyer, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

WLM:nlp

cc: Mr. William Paige
Prentiss Anne Allen
Mr. Keith Lawson
Mr. Jim Moore
Mr. Jerry Rhodes
Mr. Julian Foscue

Enclosure