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Your Name: Jenny Patterson

Document Category: Facility

Document Group: General

Document Type: Other (O)

EPA ID: NCD982157067

Facility Name/Subject: Fortress Wood Products

Document Date: 09/07/2016

Description:

2016 RCRA Drip Pad Inspection/Certification for Fortress Wood Products

Author: Michael L. Walker, The EI Group, Inc.

Branch/Unit:

Facility/Site Address: 899 Foreman Bundy Road

Facility/Site City: Elizabeth City

Facility/Site State: North Carolina

Facility/Site Zipcode: 27906

Facility/Site County: Pasquotank

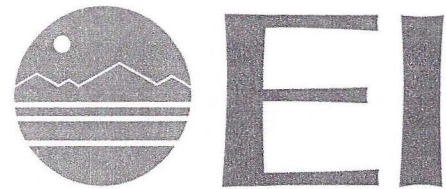
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September 7, 2016



Jeremy Gingrich
Fortress Wood Products
899 Foreman Bundy Road
Elizabeth City, NC 27906

RE: RCRA Drip Pad Inspection
Fortress Wood Products, Elizabeth City, NC
EI Project No. ENMO160117.00



Dear Mr. Gingrich:

The EI Group, Inc. (EI) has been contracted to conduct the RCRA-required assessment of the RCRA drip pad at Fortress Wood Product's Elizabeth City, North Carolina wood treatment facility. This assessment was conducted to satisfy the requirements of 40 CFR 265.441. Based on the information available and the conditions present during the field inspection, the drip pad at the Elizabeth City facility met the applicable requirements of Subpart W.

The annual inspection of the drip pad was conducted by Michael L. Walker, P.E. of EI on Tuesday, August 16, 2016. The treatment facility was operating during the inspection. Additionally, Fortress Wood Products has discontinued use of CCA at the Elizabeth City facility in favor of treating wood using Copper Azole (CA-C) and Micronized Copper Azole (MCA).

The unlined pad is enclosed within the treatment building. The pad is constructed of concrete and is sloped toward the tank pit near the treatment cylinder. There is a curb around the entire perimeter of the pad. (40 CFR 265.443(a))

At the time of the inspection, the pad appeared to be generally in good condition, free of unrepaired cracks, gaps, corrosion, or other deterioration that could cause drippage to be released from the drip pad. (40 CFR 265.443(c)) The slope of the pad directs drippage toward the collection pit; the pad elevation drops one foot from each of the four corners of the building to the pit. The entire perimeter of each pad is bermed, thereby preventing the runoff of material (40 CFR 265.443(d)). The run-on of rain or other precipitation from the surrounding yard is prevented by the berms and the building (40 CFR 265.443(e)). Since the drip pad is within the building, the pad drainage system, which ultimately returns drippage to the batch chemical make-up tank, will not be required to contain a 24-hour, 25-year storm event (40 CFR 265.443(f)).

Employees appear to manage operations effectively. Any collected liquid is returned for reuse as it is collected thus preventing overflow (40 CFR 265.443(h)). Residues are cleaned from the pad surfaces promptly and all cleaning activities are documented on a Record of Clean-up form (40 CFR 265.443(i)). The facility is generally operated to minimize tracking of material from the pad (40 CFR 265.443(j)). The Drip Pad Log shows that each charge of wood is held on the pads for an adequate duration (generally one to two days) so that drippage ceases before the material is moved. (40 CFR 265.443(k)) Since the pad is within the building no stormwater is collected on the pad.

Mr. Jeremy Gingrich
Fortress Wood Products
September 7, 2016
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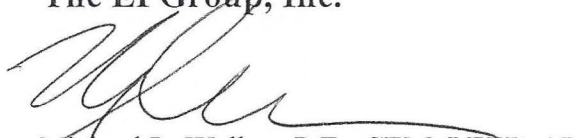
Any water contained is returned to the process and the pit is emptied as material is collected, therefore water is properly managed to prevent overflows or releases (40 CFR 265.443(l)). Regular inspections monitor conditions to prevent leaks from the pad (40 CFR 265.443(m)).

Finally, regular inspections are conducted as required and records are in good condition (40 CFR 265.443(n) and 254.444(b)). The Drip Pad Log records the time each charge is held on the pad after treatment. The Storage Yard Drillage Contingency Plan/Record of Clean-up provides a record for pad cleaning activities. The Hazardous Waste Weekly Inspection Log records the conditions associated with the waste drums and storage area. Also, the operating log that records process activities is maintained.

In summary, the RCRA pad appears to in good general condition and good housekeeping is practiced regarding the maintenance of the drip pad and associated operations. Plant personnel have generally maintained the concrete seams in good condition.

EI appreciates the opportunity to provide this assessment and serve the needs of Fortress Wood Products. Please feel free to contact me at your convenience with any questions or comments.

Sincerely,
The EI Group, Inc.

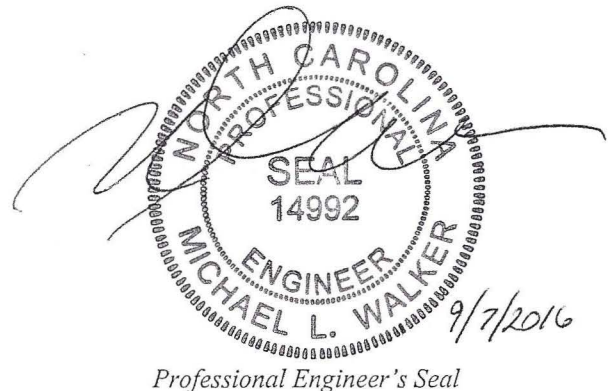


Michael L. Walker, P.E., CEM, LEED-AP
Vice President, Energy & Environment

MLW/

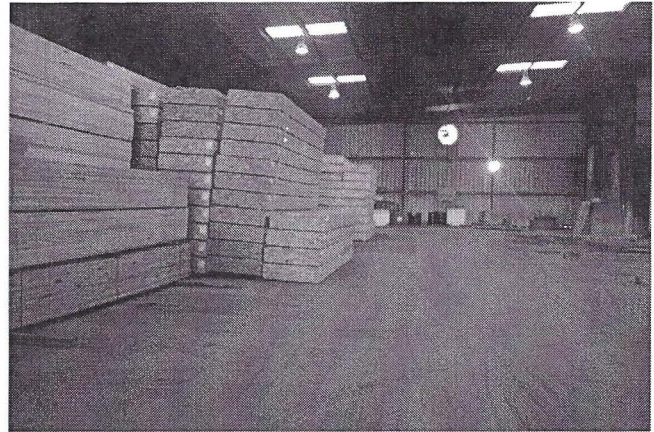
cc: Scott Fulcher, Fortress Wood Products

Jenny Patterson
Eastern Region Supervisor
NCDENR, Division of Waste Management
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Raleigh, NC 27699-1646

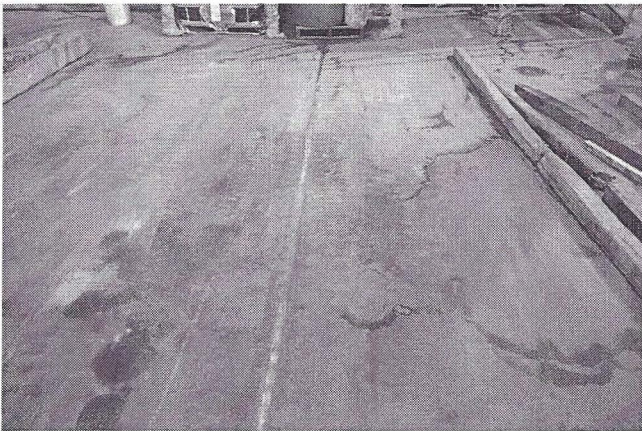




Drip pad building and charge cart



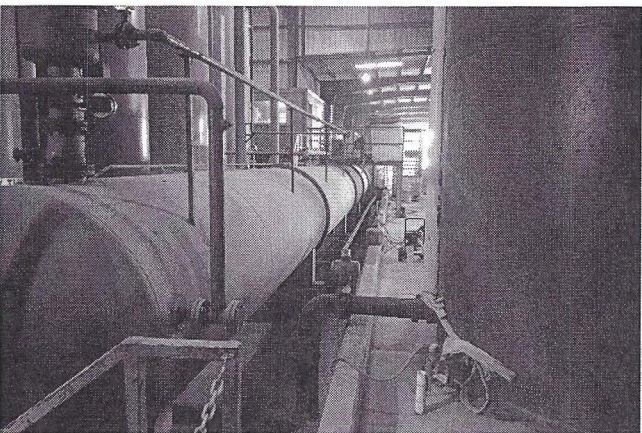
Treated material on pad



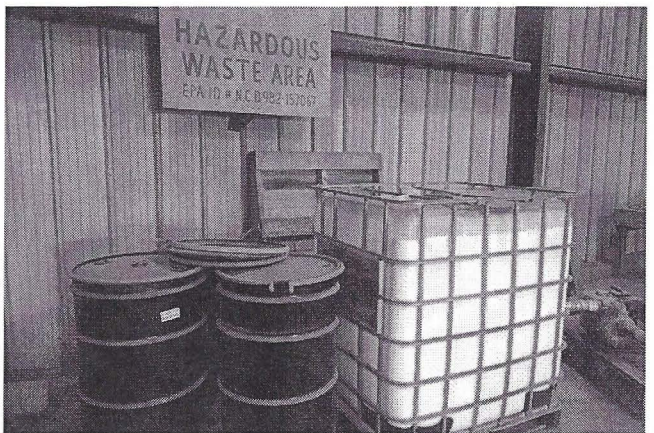
Sealed concrete expansion joint



Resealed (repaired) expansion joint



Treatment cylinder



Hazardous waste drums for cleanup materials