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Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY

State of North Carolina
Department of Environment
and Natural Resources
Winston-Salem Regional Office

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary



**DIVISION OF WATER QUALITY
GROUNDWATER SECTION**

January 12, 1998

Engineered Controls International, Inc.
Attn: Chester Johnson
1239 Rock Creek Dairy Rd.
Whitsett, NC 27377

Subject: Underground Storage Tank Closure, Engineered Controls International, 1239 Rock
Creek Dairy Rd., Whitsett, Guilford County, NC
Incident # 17781

Dear Mr. Johnson:

On November 14, 1997, we received the soil sample results and closure assessment from the release at the subject location. After careful review of your report we have determined that no further action is warranted. However, this does not absolve you of any responsibility for contamination that may not have been detected or noted during the site assessment.

If you have any questions, please feel free to contact Kelly C. Gage at (336) 373-3771.

Sincerely,

Sherri V. Knight
Groundwater Section Supervisor

cc: WSRO files
Guilford County Health Dept.

State of North Carolina
Department of Environment,
Health and Natural Resources
Winston-Salem Regional Office

James B. Hunt, Jr., Governor



**NOTICE OF VIOLATION OF THE OIL POLLUTION AND
HAZARDOUS SUBSTANCES CONTROL ACT**

September 16, 1997

RETURN RECEIPT REQUESTED
CERTIFIED MAIL NUMBER P 422 763 401

Engineered Controls International, Inc.
Attn: Mr. Chester Johnson, Plant Manager
1239 Rock Creek Dairy Road
Whitsett, NC 27377

Subject: Cutting Oil Release, 1239 Rock Creek Dairy Road,
Whitsett, Guilford County, NC
Facility ID: N/A
Groundwater Incident Number: Pending
Site Priority Ranking: Pending

Dear Mr. Johnson:

Chapter 143, North Carolina General Statutes, authorizes and directs the Environmental Management Commission of the Department of Environment, Health, and Natural Resources to protect and preserve the water and air resources of the State. This letter is standard notice explaining the actions you must take as a result of the release in accordance with North Carolina laws. The Division of Water Quality (DWQ), administers the Oil Pollution and Hazardous Substances Control Act of 1978 which requires cleanup of petroleum and hazardous substance releases.

Information received by this office on September 8, 1997 and a staff site visit on September 9, 1997 confirm a product release associated with the subject property. Stained soils covered by new gravel were observed along the east wall of the plant building and continuing down slope to a paved parking area.

Such a discharge is in violation of G.S. 143-215.75 et. seq. Oil Pollution and Hazardous Substances Control Act of 1978. Please reference the following excerpts from the Act:

585 Waughtown Street
Winston-Salem, North Carolina 27107-2241
Voice 910-771-4600



FAX 910-771-4632
An Equal Opportunity/Affirmative Action Employer
50% recycled/10% post-consumer paper

*** 143-215.83. Discharges.**

(a) Unlawful Discharges.--It shall be unlawful, except as otherwise provided in this Part, for any person to discharge, or cause to be discharged, oil or other hazardous substances into or upon any waters, tidal flats, beaches, or lands within this State, or into any sewer, surface water drain or other waters that drain into the waters of this State, regardless of the fault of the person having control over the oil or other hazardous substances, or regardless of whether the discharge was the result of intentional or negligent conduct, accident or other cause.

*** 143-215.84. Removal of prohibited discharges.**

(a) Person Discharging.--Any person having control over oil or other hazardous substances discharged in violation of this Article shall immediately undertake to collect and remove the discharge and to restore the area affected by the discharge as nearly as may be to the condition existing prior to the discharge. If it is not feasible to collect and remove the discharge, the person responsible shall take all practicable actions to contain, treat and disperse the discharge; but no chemicals or other dispersants or treatment materials which will be detrimental to the environment or natural resources shall be used for such purposes unless they shall have been previously approved by the Environmental Management Commission.

It is our understanding that you and/or your firm are responsible for violation of the Oil Pollution and Hazardous Substances Control Act. Therefore, you are required to immediately undertake clean-up of contamination and restoration of the affected area. Please conduct the following:

1. Submit a site assessment report which describes the full vertical and horizontal extent of contamination. An adequate report must be received by this by November 14, 1997.
2. If investigations indicate that a corrective action plan (remedial action plan) is required, the plan must be submitted and approved. This plan must be implemented until such time that you can demonstrate that continuation of the plan would not result in any significant reduction in the concentration of contaminants. If a corrective action plan is required, than public notice of the plan must be provided as described in the 15A NCAC 2L rules (Title 15A NCAC 2L .0114). Should a corrective action plan be warranted it must be received by this office within 150 days from receipt of this notice.

If requested, the Winston-Salem Regional Office may allow an alternate compliance schedule, or may allow certain reports to be combined. In order for such an alternate compliance schedule to be considered, you must contact Melanie Wells immediately at (910) 373-3771 and

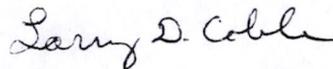
follow-up in writing with a proposed schedule.

Your prompt attention to the items described herein is required. Failure to comply with the State's rules may result in the assessment of civil penalties and/or the use of other enforcement mechanisms available to the State. Each day that a violation continues may be considered a separate violation.

If you believe you are not the responsible party, notify the Groundwater Section (include documentation of your position in your response) within fifteen (15) days of receipt of this notice.

For a detailed description of your requirements please refer to the Groundwater Section Guidelines for the Remediation of Soils and Groundwater", and 15A NCAC 2L "Classifications and Water Quality Standards Applicable To The Groundwaters of North Carolina". If you have any questions regarding the actions that must be taken or the rules mentioned in this letter, please contact Melanie Wells at (910) 373-3771 or Guilford County Environmental Health, 301 N. Eugene Street, Greensboro, NC 27401.

Sincerely,



Larry D. Coble
Regional Supervisor

LDC/mlw

cc: Incident Management Unit
Winston-Salem Regional Office Files
Guilford County Health Department

Revised 1/9/98

POLLUTION INCIDENT/U.S.T. LEAK REPORTING FORM

Department of Environment, Health, Natural Resources
 Division of Environmental Management
 GROUNDWATER SECTION

Chronic GW Contamination (Y/N)	N	Incident #	17781
Minor Soil Contamination (Y/N)	N		
Minor Soil Contamination (Y/N)	Y	OCB Incident Corrected or Lack Detected	9/8/97

INCIDENT DESCRIPTION

Incident Location/Name: Engineered Controls International

Address: 1239 Rock Creek Dairy Road

City/Town: Whitsett | County: Guilford | Region: WSRO

Energy Describe Incident: Plant stores cutting oil in tanks inside bldg. Oil is leaking through expansion joint at bldg wall to exterior environment. Stained soil and gravel are visible at east wall of plant and continue down slope to paved parking lot. Oil Spill NOV 9/16/97

POTENTIAL SOURCE OWNER-OPERATOR

Potential Source Owner-Operator: Engineered Controls International, Inc | Telephone: (910) 449-7706

Company ATTN: Mr Chester Johnson | Street Address: 1239 Rock Creek Dairy Road
Plant Manager

City: Whitsett | County: Guilford | State: NC | Zip Code: 27377

OWNERSHIP

0. N/A 1. Municipal 2. Military 3. Unknown 4. Private 5. Federal 6. County 7. State

OPERATION TYPE

0. N/A 1. Public Service 2. Agriculture 3. Residential 4. Educational/Relig. 5. Industrial 6. Commercial 7. Mining

POLLUTANTS INVOLVED

MATERIALS INVOLVED	AMOUNT LOST	AMOUNT RECOVERED
<u>Cutting oil lubricant</u>	<u>?</u>	<u>?</u>

SOURCE OF POLLUTION

PRIMARY SOURCE OF POLLUTION (Select one)	PRIMARY POLLUTANT TYPE (Select one)	LOCATION	SETTING
1. Intentional dump	1. Pesticide/herbicide	1. <u>Facility</u>	1. Residential
2. Pt. pond, lagoon	2. Recreative water	2. Railroad	2. <u>Industrial</u>
3. Leak-underground	3. Gasoline/diesel	3. Waterway	3. Urban
4. Spray irrigation	4. Heating oil	4. Pipeline	4. Rural
5. Litter collection	5. <u>Other petroleum prod.</u>	5. Dumpsite	
6. Animal faeces	6. Sewage/sanitary	6. Highway	
7. Source unknown	7. Fertilizer	7. Residence	
8. Septic tank	8. Sludge	8. Other	
9. Sewer line	9. Solid waste leachate		
10. Storage	10. Mercur		
11. Landfill	11. Other inorganic		
12. Soil leachate	12. Other organic		

Site Priority Ranking B-050

IMPACT ON DRINKING WATER SUPPLIES

WELLS AFFECTED

1. YES

2. NO

NUMBER OF WELLS AFFECTED _____

Well(s) Contaminated (If any Name)

1.

2.

3.

4.

5.

Cite Appropriate Responses

Lab Samples Taken By:

1. DEM

2. DHS

3. Responsible Party

4. Other

5. None

Samples Taken Include:

1. Groundwater

2. Soil

LOCATION OF INCIDENT

7 1/2 Min. Quad Name

Lat : Deg : Min : Sec :

5 Min. Quad Number

Long : Deg : Min : Sec :

Draw Sketch of Area or Attach Aerial Photo Map

Incident Name: Engineered Controls INT

Region/County: WSRO / Guilford

Groundwater Incident File #: _____

Ranking Performed by: M. Wells

Date: 9/9/97

NORTH CAROLINA
 GROUNDWATER CONTAMINATION INCIDENT MANAGEMENT
 SITE PRIORITY RANKING SYSTEM
 (To be completed by Regional Office)

IMMINENT HAZARD ASSESSMENT

Points Awarded

- A. Vapor Hazard - free product in confined areas or vapor phase contamination detected at or above 20% of the lower explosive limit or at health concern levels; award 50 points total _____
- B. Fire - free product subject to ignition in exposed areas such as surface water impoundments, streams, excavations, etc.; award 50 points total _____

EXPOSURE ASSESSMENT

- A. Contaminated Drinking Water Supplies
 - 1. Private, domestic water supply well containing substances in concentrations exceeding 15A NCAC 2L groundwater quality standards; award 10 points per well _____
 - 2. Public or institutional water supply well containing substances in concentrations exceeding 15A NCAC 2L groundwater quality standards; award 20 points per well _____
 - 3. Exceedances of Class WS- 1 surface water quality standards as a result of groundwater discharge; award 20 points per surface water body impacted _____
 - 4. Any water supply well identified in Items II. A. 1 and II. A. 2 that cannot be replaced by connecting to an existing public water supply source; award additional 10 points per irreplaceable well _____
- B. Threat to Uncontaminated Drinking Water Supplies
 - 1. Private, domestic water supply well located within 1500 feet down gradient of the discharge, release or known extent of contaminant; award 10 points per well 10
 - 2. Public or institutional water supply well located within 1500 feet down gradient of the discharge, release or known extent of contaminant; award 15 points per well _____
 - 3. Raw surface water intake for public water supply located within 1/2 mile down gradient of the discharge, release or known extent of contaminant; award 5 points per water supply system _____
 - 4. Any well identified in Items II. B. 1 and II. B. 2 or an intake in Item II. B. 3, are located within 250 feet of the discharge, release or known extent of contaminant; award additional 20 points total (not per well or intake) _____
- C. Vapor Phase Exposure
 - 1. Contaminant vapors detected in inhabitable building(s) but levels are below 20% of the lower explosive limit and health concern levels; award 30 points total _____
 - 2. Contaminant vapors detected in other confined areas (uninhabitable buildings, sewer lines, utility vaults, etc.) but levels are below 20% of the lower explosive limit; award 10 points total _____

II. SOURCE ASSESSMENT

- A. Uncontrolled or Unabated Contaminant Source (including dumpsites, stockpiles, lagoons, contaminant soil, land applications, septic tanks, landfills, underground and aboveground storage tanks, etc.)
 - 1. Suspected or confirmed primary source remains in active use and continues to receive raw product, wastewater or solid waste; award 30 points per source 30

Points Awarded

- 2. Active use of suspected or confirmed primary source has been discontinued or source was caused by a one-time release of product or waste, however, primary or secondary source continues to release product or contaminants into the environment; award 10 points per source

IV. ENVIRONMENTAL VULNERABILITY ASSESSMENT

- A. Vertical Contaminant Migration - Literature or well logs indicate that no confining layer is present above bedrock or within twenty feet of land surface; award 10 points total
- B. Horizontal Contaminant Migration - Data or observations indicate that no discharge points or aquifer discontinuities exist between the discharge, release or known extent of contamination and the nearest down gradient drinking water supply; award 10 points total
- C. Existing Groundwater Quality - The worst case monitor or supply well contains contaminant levels:
 - 1. At less than 10 times the 2L groundwater standards; award 5 points
 - 2. Between 10 and 100 times the 2L groundwater standards; award 20 points
 - 3. Greater than 100 times the 2L groundwater standards; award 40 points

10

V. REGIONAL OFFICE RESPONSE (LETTER RANK)
(Put an X on the line next to all conditions that apply)

CATEGORY A (one or more of the following conditions are present)

- 1. One or more water supply well(s) are contaminated and the persons using the wells are not served by an existing public water supply.
- 2. Petroleum vapors present in confined areas at levels that pose a human health concern or an explosion hazard.
- 3. A treated surface water supply is in violation of the drinking water standards set out in rules adopted by the Commission for Health Services under G.S. 130A-315.

CATEGORY B (one or more of the following conditions are present)

- 1. One or more water supply wells are contaminated but the persons using the wells are served by an existing public water supply.
- 2. One or more water supply well(s) are in use within 1500 feet of discharge, release or known extent of contamination, the wells are not contaminated, and the persons using the wells are not served by an existing public water supply.
- 3. Petroleum vapors present in confined areas but do not currently pose a threat to human health or an explosion hazard.

CATEGORY C (both of the following conditions are present)

- 1. One or more water supply well(s) are present at a distance greater than 1500 feet of the discharge, release or known extent of contamination, and the persons using the wells are not served by an existing public water supply.
- 2. None of the identified water supply wells are contaminated.

CATEGORY D (both of the following conditions are present)

- 1. One or more water supply well(s) are present within 1500 feet of the discharge, release or known extent of contamination, and the persons using the wells are served by an existing public water supply.
- 2. None of the identified water supply wells are contaminated.

CATEGORY E (both of the following conditions are present)

- 1. Water supply well(s) are not present within 1500 feet of the discharge, release or known extent of contamination, and no known water supply well(s) are contaminated.
- 2. All persons within 1500 feet of the discharge, release or known extent of contamination are served by an existing public water supply.

TOTAL POINTS AWARDED

E 40

B050

=/letter



1390



State of North Carolina
Department of Environment, Health, and Natural Resources
Winston-Salem Regional Office

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

Margaret Plemmons Foster
Regional Manager

DIVISION OF ENVIRONMENTAL MANAGEMENT

March 12, 1991

Mr. John Ham
Engineered Controls International, Inc.
P.O. Box 247
Elon College, NC 27244

Dear Mr. Ham:

**Subject: Air Permit No. 6824R
Engineered Controls International, Inc.
Whitsett, North Carolina
Guilford County**

In accordance with your completed application received February 1, 1991, we are forwarding herewith Permit No. 6824R to Engineered Controls International, Inc., Whitsett, North Carolina for the construction and operation of air emission sources or air cleaning devices and appurtenances.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you may request modification of your air permit pursuant to General Statute 150B-22, through which the permit may be modified by the Director. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which modification is being sought. Unless such a request is made within thirty (30) days following the receipt of this permit, this permit shall become final and binding.

In the alternative, you have the right to request a formal adjudicatory hearing within thirty (30) days following receipt of this permit, identifying the specific issues to be contended. This hearing request must be in the form of a written petition, conforming to General Statute 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Hearings, Post Office Drawer 27447, Raleigh, North Carolina 27611-7447. Unless a request is made for either an informal modification pursuant to G.S. 150B-22 or a formal adjudicatory hearing pursuant to G.S. 150B-23, this air permit shall be final and binding.

Mr. John Ham
Page 2
March 12, 1991

All new construction of air pollution sources, air cleaning devices, or modifications to the sources contained in this permit must obtain, as required, a permit from this Division prior to construction. Failure to do so is a violation of General Statute 143-215.108 and may subject the permittee to civil or criminal penalties contained in General Statute 143-215.114

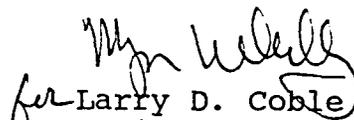
The North Carolina General Assembly in 1987 authorized the North Carolina Environmental Management Commission (EMC) to adopt regulations which charge annual fees for permit administration and compliance monitoring. After public hearings, the EMC adopted regulation 15A North Carolina Administrative Code 2H .0609 which set the annual fees for air permits issued, renewed, revised, or modified on or after August 1, 1988.

Annual fees are not charged for a farmer whose permit is for farming operations, for minor sources who emit less than three tons per year of each air pollutant, and for sources not expected to operate during the annual billing period.

The range of annual fees is from \$250.00 to \$1,375.00 depending on the source type category. If the Permittee has not received any notices of violation or non-compliance for the previous calendar year, then the annual fee is reduced by 25%. Within sixty days you will receive an invoice for either annual fee payment or certification that no fee is required. If a fee is required and timely payment is not received the Division will initiate steps to revoke the permit.

This permit shall be effective from March 12, 1991, until June 1, 1995, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Sincerely,


for Larry D. Coble
Regional Supervisor

Enclosures

cc: Lee Daniel
Guilford County Division of Emergency Management ✓

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION
DEPARTMENT OF ENVIRONMENT, HEALTH, AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL MANAGEMENT

A I R P E R M I T N O . 6824R

1390A.

Issue Date: March 12, 1991

Effective Date: March 12, 1991

Expiration Date: June 1, 1995

Replaces Permit: 6824

To construct and operate air emission source(s) or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere. In accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and other applicable Laws, Rules and Regulations,

Engineered Controls International, Inc.
1239 Rock Creek Dairy Road
Whitsett, Guilford County, North Carolina

is hereby authorized to construct and operate air emission sources or air cleaning devices and appurtenances consisting of:

one vapor degreaser equipped with chiller coils,

in accordance with the completed application (APP 012751) received February 1, 1991, including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environment, Health, and Natural Resources and are incorporated as part of this Permit.

This Permit is subject to the following specified conditions and limitations including any TESTING, REPORTING, OR MONITORING REQUIREMENTS:

A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources or control devices authorized above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including 15A NCAC 2D .0518 (e), .0522, and .0535.
2. The following requirements must be met for the conveyORIZED degreaser in accordance with NCAC 2D .0930 (f):
 - A) all solvent carry out from the degreaser must be minimized to the fullest extent possible,

- B) the following safety switches must be operational: a condenser flow switch, and a spray safety switch or device to prevent low vapor levels,
 - C) a vapor level control thermostat must be operational,
 - D) water must not be visually detectable in solvent exiting the water separator of the degreaser, and
 - E) downtime covers for closing off the degreaser during shutdown hours must be used.
3. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, when volatile organic compounds or odorous emissions exceed Environmental Management Regulations for more than four hours the Regional Supervisor, Division of Environmental Management, Winston-Salem Region, (919) 761-2351, shall be notified as promptly as possible but in no case later than 24 hours of becoming aware of the occurrence. Such notice shall specify the facility name and location, the nature and cause of the excess emissions, the time when first observed, the expected duration, and the estimated rate of emissions. This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.
4. After May 1, 1991, and at such at time when the Division of Environmental Management requests it , demonstration shall be made that emissions of trichloroethylene from the facility do not cause or contribute to any significant ambient air concentration that may adversely affect human health, in accordance with 15A NCAC 2D .1104 (b).
5. The Permittee must comply with any applicable Federal, State, or local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Solid Waste Management.

B. GENERAL CONDITIONS AND LIMITATIONS

1. REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, AND REQUESTS FOR RENEWAL shall be submitted to the:
- Regional Supervisor
North Carolina Division of Environmental Management
Suite 100, 8025 North Point Boulevard
Winston-Salem, North Carolina 27106-3203
2. PERMIT RENEWAL REQUIREMENT - The Permittee, at least ninety (90) days prior to the expiration of this Permit, shall request its extension by letter. The letter should include the permit number, the appropriate renewal fee, description of any

modifications, and should be sent to the Regional Supervisor, Division of Environmental Management.

3. ANNUAL FEE PAYMENT - The Permittee must pay the annual administering and compliance fee or submit a certification for exemption within 30 days after being billed by the Division. Failure to timely pay the fee or submit a certification for exemption in accordance with 15A NCAC 2H .0609(m) will cause the Division to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - A new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - Any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, Division of Environmental Management:
 - (a) changes in the information submitted in the application regarding facility emissions,
 - (b) changes that modify equipment or processes of existing permitted facilities, or
 - (c) changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the Division of Environmental Management to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.

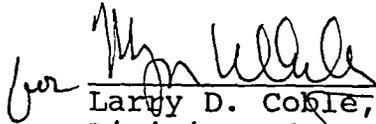
6. This Permit is subject to revocation or modification by this Division upon a determination that information contained in the application or presented in support thereof is incorrect, conditions under which this Permit was granted have changed, or violations of conditions contained in this Permit have occurred. The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no air emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. This Permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the Division of Environmental Management.
8. This Permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
9. Reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, Division of Environmental Management at such intervals and in such form

and detail as may be required by the Division. Information required in such reports may include, but is not limited to process weight rates, firing rates, hours of operation, and preventive maintenance schedules.

10. A violation of any term or condition of this Permit shall subject the Permittee to enforcement pursuant to North Carolina General Statute 143-215.114, including assessment of civil penalties.
11. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the Division of Environmental Management who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

Permit issued this the 12th day of March, 1991.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION



Larry D. Coble, Regional Supervisor
Division of Environmental Management
By Authority of the Environmental Management Commission

Air Permit No. 6824R



1020



State of North Carolina
Department of Environment, Health, and Natural Resources
Winston-Salem Regional Office

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

Margaret Plemmons Foster
Regional Manager

DIVISION OF ENVIRONMENTAL MANAGEMENT

October 23, 1990

CERTIFIED MAIL NUMBER P-536 304 033
RETURN RECEIPT REQUESTED

Mr. John E. Ham
Engineered Controls International, Inc
P. O. Box 247
Elon College, NC 27244

Dear Mr. Ham:

Subject: Notice of Violation
Engineered Controls International, Inc.
Whitsett, North Carolina
Guilford County
4-41-00731 B

On October 17, 1990 this office received the quarterly report of the volatile organic compound (VOC) emissions of trichloroethylene, a photochemically reactive solvent, from the vapor degreaser located at 1239 Rock Creek Dairy, Whitsett, NC. This report showed average daily VOC emissions of 74.4 pounds per day for this period, which is in excess of the 40 pounds per calendar day limit. Your facility is therefore operating in violation of 15A NCAC 2D .0518(d) and Permit No. 6824.

You are advised to take the necessary steps to reduce these VOC emissions, so that they do not exceed 40 pounds per calendar day. Please keep this office notified in writing of the actions being taken. Your quick action toward finding a solution to this violation is appreciated.

This violation is subject to enforcement action, including injunctive relief, pursuant to G.S. 143-215.114, or permit revocation as authorized by G.S. 143-215.108 (b)(3).

Please contact Brent Rockett, Myron Whitley or me if you have any questions.

Sincerely,

Larry D. Coble

Larry D. Coble
Regional Supervisor

LDC/BSR

cc: Lee Daniel
Guilford County Div. of Emergency Management