

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: Sean Morris

Facility ID Number: NCD057927857

Facility Name: Industrial Electroplating Company, Inc.

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County (if not on report): Gaston

NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH

RCRA INSPECTION REPORT

1. **Facility Information:** Industrial Electroplating Company, Inc.
307 South Linwood Road
Gastonia, N.C. 28052
NCD 057 927 857

Mailing Address: P.O. Box 1537
Gastonia, NC 28053-1537
2. **Facility Contact:** Mr. Walter Prescott, CEO
704-616-5281
3. **Inspectors:** Mr. Sean Morris, NC HWS-Environmental Senior Specialist
Mr. Mark Burnette, NC HWS-Environmental Senior Specialist
4. **Survey Participants:** Mr. Scott Curtis, Industrial Chemist
5. **Date/Time of Inspection:** January 20, 2016 – Arrived: 10:40am Departed: 1:45pm

Date of Report: April 25, 2016 – Prepared By: Sean Morris
6. **Purpose of Inspection:** To determine compliance with NC Hazardous Waste Rules & Regulations
7. **Report:**

On January 20, 2016 Mr. Mark Burnette and I conducted a compliance evaluation inspection at Industrial Electroplating Company, Inc. (IEP). We met with Mr. Scott Curtis through the duration of the inspection.

The IEP facility is located near downtown Gastonia, NC and has been in operation at the current location since 1971. The facility includes several buildings totaling 70,000 square feet and currently has 48 permanent & 38 temporary employees working two shifts, five days a week. The facility is supplied with municipal water and sewer service. There are no known water supply wells on the property and it is unknown if any wells are located on bordering properties. The facility includes several buildings, which total approximately 70,000 square feet in size. IEP also operates a 15,000 square foot warehouse, used for shipping and receiving, and is located three blocks from the main facility at 1401 Gaston Avenue. There is one residence located approximately one block to the southwest of the facility.

IEP's primary operation is metal coating, metal plating & e-coat/powder rack coating of metal parts such as nuts, bolts, mounting brackets and fasteners used in the truck manufacturing industry. Processes include zinc rack-plating and zinc barrel-plating as well as chromate conversion coating. IEP also offers specialty plating services for various types of specialty & precision parts. The facility operates metal part cleaning lines, using both acid and alkali cleaners, performs acid zinc/alkali zinc plating and performs chromate coating. The facility also performs powder coating of metal parts and began operation of an e-coating line in April 2015. Mr. Curtis explained that the facility is has removed their nickel plating line and two zinc plating lines over the past two years.

The facility primarily generates F006 hazardous wastewater treatment (WWT) sludge, generated from one onsite wastewater treatment unit. Hazardous waste can also be generated from tank clean-outs of caustic and acid cleaners and from off-specification plating chemicals. The facility currently generates approximately 4000-7000-pounds of F006 hazardous waste on a monthly basis and was operating as a large quantity generator (LQG) at the time of the inspection.

8. Waste Type:

- F006, hazardous waste solid
- D002/F006, waste corrosive liquid (sodium hydroxide)
- D002/D006/D007/D008, waste corrosive liquid (potassium hydroxide)
- D002/D004/D006/D007/F006, waste corrosive liquid (chrome, muriatic acid)
- D004/D006/D007/F006, waste toxic solids (chrome, muriatic acid)

9. Areas of Inspection:Manifests:

Hazardous waste manifests from 2014 to present were reviewed at the time of the inspection. The manifests reviewed were in good order and documented approved transporters and TSD facilities. Land Disposal Restriction forms were available.

Transporters: Envirite of Ohio, Inc. – OHD 980 568 992
 Shamrock Env. Corp. – NC0 000 942 144
 Vickery Env., Inc. – OHD 020 273 819
 DART – NCD121700777

TSDs: Envirite of Ohio, Inc. – OHD 980 568 992
 Envirite of Penn., Inc. – PAD 010 154 045

Waste Minimization:

The facility maintains a written waste minimization plan onsite. The plan is dated October 2006 and is reviewed annually. The plan includes an activity log of actions taken to reduce waste and lists the actions by date. The plan also lists goals and strategies. The facility has reduced F006 and D002 waste streams over the past year by using different WWT chemicals and by re-using rinse waters. The removal of the nickel plating line and zinc plating lines will also reduce the amount of F006 WWT sludge generated. Facility personnel should review/revise the waste minimization plan on an annual basis (See Comment Section).

Weekly Inspections:

The facility currently conducts and documents weekly inspections of containers at the Central Hazardous Waste Storage Area and at each of the F006 Filter Press Areas. Inspections are currently being conducted and documented and the inspection log was up to date. The facility also maintains a log of daily sludge generation events and lists hours during the day that F006 is placed in hoppers. Mr. Scott Sherrill conducts most of the inspections with Mr. Scott Curtis designated as back-up.

Emergency Preparedness:

The facility is equipped with a P/A system. The facility is equipped with fire extinguishers, pull stations, alarms, and a sprinkler system in the powder coating area. The local fire department conducts periodic inspections at the facility. The emergency equipment is also inspected on a regular basis. The facility submitted emergency arrangement agreement request letters to local authorities by certified mail in June 2015. The facility's primary emergency coordinator is Mr. Walter Prescott, IES-President and there are four alternates listed. The facility also maintains spill kits at the facility and each of the plating lines is equipped with secondary containment vaults. All managers carry Nextel phones.

Training:

The facility maintains a RCRA training program. The training outline was available for review and Mr. Scott Curtis attended the NC LQG Generator Workshop in May 2015. The training outline includes facility specific waste types and identification, container management procedures, emergency procedures, contingency plan topics and universal waste topics. Mr. Scott Curtis and Mr. Curtis Brooks present training to employees. There are currently seven employees trained in hazardous waste management/handling and the last training

dates were documented in October & November 2015. Each of the RCRA trained employees have an individual training record file that includes a RCRA job title and job description and training sign-in completion documents are maintained. The facility has two RCRA job titles and descriptions, "Hazardous Waste Manager/Handler" and "Primary Haz-Waste Emergency Coordinator". Because of the facility's employee structure, hazardous waste handlers may also act as alternate emergency coordinators (See Comment Section).

Biennial Report:

The facility submitted a 2013 biennial report on February 11, 2014. The facility generated 60,827-pounds of F006 hazardous waste and 10,959-pounds of D002 waste sodium hydroxide hazardous waste in 2013.

Contingency Plan:

The facility keeps a contingency plan on-site. The plan was last revised in June 2015 to include operational changes associated with the addition of the facility's E-Coating Line. The current plan lists the primary emergency coordinator as Mr. Walter Prescott and also includes four alternates. The emergency coordinator's home phone numbers and addresses are listed in the current plan. The facility has a P/A system and the plan describes the type, location and capabilities of emergency equipment available at the facility. The plan also lists emergency response procedures, emergency coordinator duties, spill response, and evacuation procedures. The contingency plan includes building diagrams with fire extinguisher, fire alarm, spill kits and hazardous waste storage area locations. The plan lists Shamrock Environmental Corp as their emergency response contractor. The plan includes a description of emergency arrangement agreement requests with local authorities. The current contingency plan was submitted to all required authorities in June 2015 by certified mail.

Satellite Accumulation Areas (SAAs):

There were not any hazardous waste satellite accumulation areas at the facility at the time of the inspection.

Hazardous Waste Storage Areas:

The following storage areas were inspected:

Central Hazardous Waste Storage Area - The storage area is located in the building next to the front office building. The area is labeled with a "Hazardous Waste Storage Area" sign. The area is equipped with a fire extinguisher, spill kit, and air horn. There were two 55-gallon containers of hazardous waste in storage at the time of the inspection. The containers were all properly labeled and dated. The storage area is equipped with an air horn for emergency communication. This area is also used to store product materials.

Filter Press Area #1 - The facility collects F006 sludge from two filter press units located next to the WWT area. Each filter press has a one cubic yard hopper located under the press area, which is used to collect F006 waste filter cake. When a hopper first accumulates F006 waste, the container is dated. It generally takes two pressing events to fill each of the hoppers. The Filter Press Area #1 hopper was properly labeled, dated, and closed. Generally, the waste F006 will not be in the hopper for more than one day before being placed into a cubic yard container. There are also spill kits located nearby.

Filter Press Area #2 - The facility collects F006 sludge from two filter press units located next to the WWT area. Each filter press has a one cubic yard hopper located under the press area, which is used to collect F006 waste filter cake. When a hopper first accumulates F006 waste, the container is dated. It generally takes two pressing events to fill each of the hoppers. The Filter Press Area #2 hopper was empty at the time of the inspection. Generally, the waste F006 will not be in the hopper for more than one day before being placed into a cubic yard container. There are also spill kits located nearby.

F006 Sludge Dryer Area - Once the filter press hoppers are full, the F006 waste is moved to one of two blower units that are used to de-water the sludge with ambient air. Both of the blower units are equipped attached to one cubic yard hopper. F006 waste is transferred from the filter press areas into one of the blower hoppers as needed. Once the F006 is dried the sludge is placed into poly-lined, cubic yard containers and moved to

the Central Hazardous Waste Storage Area. The drying process can take 24-hours to complete. Both of the hoppers was properly closed, labeled, and dated. There are spill kits located nearby.

Used Oil & Universal Waste:

The facility generates used oil from the maintenance of machinery and from oil skimmed from process equipment. The facility only generates a small amount of used oil that is collected for recycling by Envirite of Ohio as needed. There was one 55-gallon container of used oil located in the Cleaning Line Area and the container was properly labeled. The facility also has contracted with a laundering facility for the washing and reuse of oily cloth wipes.

The facility generates used fluorescent lamps. The lamps are managed in boxes and sent to Envirite of Penn. for recycling. Used lamps are stored in the Central Hazardous Waste Storage Area and there were not any containers of universal waste in the area at the time of the inspection. The last collection date for used lamps was on January 19, 2016.

Used Sand Blast Media Disposal Area:

During the inspection a small amount of used sand blast media was discovered on the ground around the Compressor Room, which is located behind the facility. The area was approximately 20'x20' in size and the blast media appeared to be less than one inch in depth. Mr. Curtiss explained that the blast media had been onsite for many years and that the facility no longer conducts any sand blasting. We requested that a representative sample be collected for laboratory analysis.

A sample of the blast media was collected February 24, 2016 by personnel with Shamrock Environmental. On March 1, 2016 Mr. Curtiss emailed a copy of the laboratory analytical results for the sample. The sample was analyzed for RCRA metals using the TCLP method and the results indicated that the blast media is non-hazardous. Mr. Curtiss confirmed that the media was excavated, containerized and sent for off-site disposal.

10. Comments:

- It is a reminder that IEP should review and/or revise the facility's waste minimization plan on an annual basis. The plan should be used to document waste minimization goals and accomplishments.
- It is reminder that the facility's hazardous waste job titles & descriptions should be clearly linked to all personnel who may handle or manage hazardous waste.
- It is recommended that accumulation containers be designated for used batteries and aerosol cans and that the containers remain properly labeled and closed.
- It is recommended that a section be added to the facility's contingency plan that lists the date and reason for each revision made. Facility personnel should also initial all revisions/corrections made when completing hazardous waste manifests.

11. Site Deficiencies:

No deficiencies cited during inspection.

**J. SEAN MORRIS, / DATE
NC HWS-COMPLIANCE BRANCH**

**SENT VIA E-MAIL
FACILITY CONTACT**

cc:
Brent Burch, HWS
Central Office Files
Mr. Scott Curtiss, Industrial Electroplating Company, Inc.

J. Sean Morris – NC Hazardous Waste Section
Home Duty Office: P.O. Box 660, Huntersville, NC 28070-0660
Phone: 704.464.1357 Email: sean.morris@ncdenr.gov
<http://deq.nc.gov/about/divisions/waste-management>



MERITECH, INC.

Environmental Laboratories

Laboratory Certification No. 165

Contact: Chris Freeman

Client: Shamrock Environmental Corp.
6106 Corporate Park Drive
Brown Summit, NC 27455

Report Date: 2/26/2016

Project: Sandblast Media

Sample Received: 2/24/2016

Meritech Work Order # 02241603

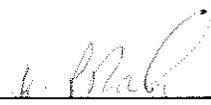
Sample: Sandblast Media (S16103) Grab

1/25/16

TCLP Metals

<u>Parameter</u>	<u>Results</u>	<u>Analysis Date</u>	<u>Reporting Limit</u>	<u>Method</u>
Arsenic	<0.100 mg/L	2/26/16	0.100 mg/L	EPA 200.7
Barium	1.16 mg/L	2/26/16	0.005 mg/L	EPA 200.7
Cadmium	<0.020 mg/L	2/26/16	0.020 mg/L	EPA 200.7
Chromium	2.77 mg/L	2/26/16	0.050 mg/L	EPA 200.7
Lead	0.130 mg/L	2/26/16	0.100 mg/L	EPA 200.7
Mercury	<0.02 mg/L	2/26/16	0.02 mg/L	EPA 245.1
Selenium	<0.100 mg/L	2/26/16	0.100 mg/L	EPA 200.7
Silver	<0.050 mg/L	2/26/16	0.050 mg/L	EPA 200.7

I hereby certify that I have reviewed and approve these data.



Laboratory Representative

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