

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

**Your Name:** Heather Goldman

**Facility ID Number:** NCD981932735 4

**Facility Name:** Iron World Manufacturing

**Document Group:** Inspection/Investigation (I)

**Document Type:** I - Complaint Investigation (CMP)

**File Description/Comments:** Violations pending additional analysis.

**Date of Document:** 2/16/2016

**Author(s) of Document:** Heather Goldman

**Inspector ID #:** NC111

**Suborganization:** Western Region

**County (if not on report):** Iredell

**For Violations:**

**Enforcement Date:** [Click here to enter a date.](#)

**Docket Number:**

**Enforcement Type:**

**How many violations were there?**

**For IANOV or CO:** The facility is

**Outcome Measures for CSE for IANOV or CO:**

| Waste Involved | Volume | Exposure Media (a, gw, sw, s) | Distance to Residences | Number of People involved | Distance to On-site wells | Distance to Off-site wells |
|----------------|--------|-------------------------------|------------------------|---------------------------|---------------------------|----------------------------|
|                |        |                               |                        |                           |                           |                            |

**Violation #1:**

**Date Determined:** [Click here to enter a date.](#)

**Scheduled Return to Compliance:** [Click here to enter a date.](#)

**Actual Return to Compliance:** [Click here to enter a date.](#)

**Regulation Description:**

**Comment:**

**For CSE, Corrections to Violations were:**

**Violation #2:**

**Date Determined:** [Click here to enter a date.](#)

**Scheduled Return to Compliance:** [Click here to enter a date.](#)

**Actual Return to Compliance:** [Click here to enter a date.](#)

**Regulation Description:**

**Comment:**

**For CSE, Corrections to Violations were:**





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sprayed with Chrom NR250, then sprayed with a clear coat, Duratop ACW Clear W-1637A 150% CR Rev #2 by Protech Chemicals, Ltd., for protection, cut to size, and packaged for shipping.

The 5-gallon clear coat spray tank recycles clear coat. Approximately once a week the clear coat tank content is changed out into a 55-gallon container and new clear coat is added to the 5-gallon tank. Then, once the solids have settled out from the clear coat that was put into the 55-gallon container, the usable material is removed from the 55-gallon container and added back into the 5-gallon clear coat spray tank for use. Once the 55-gallon container is full of waste clear coat material and no more usable material can be retrieved, the container is closed and stored on-site. The facility has not shipped any containers of waste clear coat for disposal since operations began. The facility began use of a cutter machine in January 2016. The cutter machine uses cutter oil and lube.

Mr. Galpen, Mr. Sackie, and Mr. Crawford provided the following information: For emergencies, the facility utilizes pull alarms, audible/visible alarms, and an overhead announcement system. The facility maintains fire extinguishers that are inspected annually by a third party vendor. The facility has a direct alarm to the local Fire Department. The facility maintains a map detailing the location of fire extinguishers posted by the facility's main control panel. The facility has not provided hazardous waste training to staff. The facility has not attempted to request emergency arrangements with local authorities. Facility personnel observe the hazardous waste containers weekly, but these activities are not documented. Mr. Sackie and Mr. Crawford were noted as Emergency Coordinators, but this was not documented. The facility does not generate used oil. The facility has not generated any used lamps and has not generated used batteries. Fork lift maintenance is outsourced to another company.

A walkthrough of the facility was conducted. The process line was observed. Spills of liquid materials generated throughout the process were observed on the concrete floor along the process line including the following areas: water/detergent spray; chrom NR250 spray box; clear coat spray box; cutter machine.



Water and detergent spray boxes with spills.



Chrom NR250 and clear coat spray boxes with spills.



Cutter machine with spills.



Pre-packaging line with spills.

Thirteen 55-gallon containers were observed stored on pallets along a wall inside the building. Eight containers were closed with a tightened drum ring. Five of the containers were not closed. All but three of the containers were labeled as “Old Clear Coat”. There were no dates observed on the containers. Mr. Crawford, Mr. Sackie, and Mr. Galpen agreed that if the containers were closed, then



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they were waste material and if they were open, there was still material in the container that could be used. Although the clear coat used in the process contain chromium, the facility was unable to state if the waste material or spilled material contained elevated levels of chromium.



Thirteen 55-gallon containers of clear coat waste and material.

Samples of the material was collected and analyzed for eight RCRA metals TCLP and pH. Analytical results were provided to Ms. Goldman on March 21, 2016. Barium, cadmium, chromium, and selenium were detected; however, only chromium was elevated above hazardous waste limits at 460 mg/L.

On February 18, 2016, March 3, 2016, and March 21, 2016 Ms. Goldman provided, via e-mail, guidance documents and assistive information to Iron World Manufacturing. On March 3 & 21, 2016 Ms. Goldman informed the facility of the potential variance for trivalent chromium if the facility could demonstrate that elevated levels of chromium were trivalent and not hexavalent chromium.

Based on the information provided by the facility and the facility inspection, the waste material appears to be hazardous waste. The facility is conducting additional sampling to determine if a hazardous waste variance for trivalent chromium can be requested from the Hazardous Waste Section. The investigation is ongoing, pending violations.



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Comments/Recommendations:

- If the facility is operating as a Small Quantity Generator of hazardous waste, the facility is responsible for ensuring the facility is in compliance with all applicable regulations. Guidance documents have been provided to the facility and may be found at this Hazardous Waste Section web link: <https://deq.nc.gov/hw-generator-information>.

Site Violations:

- Violations pending.

**Heather Goldman**  
**Environmental Senior Specialist**  
**DWM Hazardous Waste Section**

4/1/2016  
**Date**

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