

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

Your Name: Heather Goldman

Facility ID Number: NCD982137010

Facility Name: Southern Converters, Inc.

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: SQG. No violations noted. Facility operating as CESQG.

Date of Document: 3/22/2016

Author(s) of Document: Heather Goldman

Inspector ID #: NC111

Suborganization: Western Region

County (if not on report): Mecklenburg

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

**SMALL QUANTITY GENERATOR (SQG)
COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

1. FACILITY INFORMATION:

Name:	Southern Converters, Inc.
EPA ID Number:	NCD982137010
Type of Facility:	Small Quantity Generator (SQG)
Facility Location:	1304 Berryhill Road, Charlotte, NC 28208
Facility Address:	1304 Berryhill Road, Charlotte, NC 28208
Telephone Number:	704-393-5941
County:	Mecklenburg

2. AUTHOR OF REPORT: Heather Goldman, Environmental Senior Specialist, NCDEQ
980-224-9858 heather.goldman@ncdenr.gov
Date of Report: April 21, 2016

3. FACILITY CONTACT: Jeffery Whitlow – Press Department Manager
Office: 704-393-5941

4. SURVEY PARTICIPANTS:
Jerry Whitlow – Southern Converters, Inc.; Heather Goldman - ESS NCDEQ

5. DATE OF INSPECTION: March 22, 2016

6. PURPOSE OF EVALUATION:
An evaluation to determine compliance with hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA) which are described at Chapter 40 of the Code of Federal Regulations (40 CFR), Parts 260 – 270, 273, and 279; and Title 15 Chapter 13A Hazardous Waste Management Rules (Rules) of the North Carolina Administrative Code (NCAC).

7. DESCRIPTION OF FACILITY: Southern Converters, Inc. (facility) conducts offset printing of boxes and cartons. The facility uses a blanket wash to remove ink from the process equipment. The facility was notified as a Small Quantity Generator. However, the facility operates as a Conditionally Exempt Small Quantity Generator (CESQG). Information on how to re-notify as a CESQG through an 8700-12 form was provided. No violations noted.

General Information:

- Legal owner of facility: J.R. Cole Industries
- Legal owner of property: Cole J. R. Properties
- Number of Employees/Shifts: 69 Employees/ Three shifts, Monday - Friday
- Water supply (municipal or well): Charlotte Water
- Municipal sewer/septic/on-site treatment facility: Charlotte Water
- Number of on-site wells: 0
- Distance to closest off-site well: Approximately 600 feet
- Closest private residence: Approximately 115 feet

- Site Acreage: Approximately 3.8 acres

8. HAZARDOUS WASTE (HW) GENERATED:

Hazardous Waste Streams and Waste Codes generated on site based on hazardous waste manifest include the following:

Waste Flammable Liquid Aliphatic Hydrocarbons D001

9. AREAS OF REVIEW AND INSPECTION:

- Manifests / Land Disposal Restriction (LDR) Notifications – LDRs were reviewed for all waste streams. Hazardous waste manifest were reviewed and appeared to be in good condition.

<u>Transporters</u>	<u>EPA ID#</u>
Safety-Kleen Systems, Inc.	TXR000081205
Clean Harbors Environmental Services, Inc.	MAD039322250
Robbie D Wood, Inc.	ALD067138891

<u>TSD Facilities</u>	<u>EPA ID#</u>
Safety Kleen	KYD053348108

- Hazardous Waste Containers – There was one 55-gallon container of D001 waste. The container has an open bung hole and was not labeled or grounded. **It is strongly recommended that the facility label all hazardous waste containers in a manner to identify the waste contents with the words “Hazardous Waste” or other identifying words, maintain hazardous waste containers in the closed position, and ground containers with ignitable waste.**
- Used Oil – There were eight 55-gallon containers of used oil on the loading dock of the facility. The facility is reminded to label all used oil containers as “Used Oil” per 40 CFR 279.22.
- Universal Waste – The facility is working to switch to LED lamps. Facility maintenance staff manage used lamps.
- Other waste – The facility generates aerosol cans as part of its daily operations. Used aerosol can management options were discussed.

10. SITE DEFICIENCIES:

- None

11. COMMENTS AND RECOMMENDATIONS:

- It is strongly recommended that the facility label all hazardous waste containers in a manner to identify the waste contents with the words “Hazardous Waste” or other identifying words, maintain hazardous waste containers in the closed position, and ground containers with ignitable waste.
- The facility should refer to the NCDEQ Hazardous Waste Section Technical Assistance Guidance page located at <https://ox.deq.prod.nc.gov/about/divisions/waste-management/waste-management-permit-guidance/hazardous-waste-section-technical-assistance-education-guidance> for more guidance documents, specifically, the Generator Compliance Manual. This document provides examples that will assist as a reference for compliance.

 4/21/2016
INSPECTOR (DATE)

By E-Mail
FACILITY CONTACT

cc: Jeffery Whitlow – Southern Converters, Inc. at jwhitlow@jrcoleinds.com
 Brent Burch, Compliance Branch Head
 Central Office Files