

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

Your Name: Heather Goldman

Facility ID Number: NCR000143107

Facility Name: Pavco Inc.

Document Group: Inspection/Investigation (I) **Document Type:** I - Compliance Evaluation Inspection (CEI)

Description for File (for CARA): LQG. No violations cited.

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Author(s) of Document: Heather Goldman

Inspector ID #: NC111

Suborganization: Western Region

Comments for RCRAInfo:LQG. No violations cited.

County (if not on report): Mecklenburg

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

**LARGE QUANTITY GENERATOR (LQG)
COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

1. FACILITY INFORMATION:

Name: Pavco Inc.
EPA ID Number: NCR000143107
Type of Facility: Large Quantity Generator (LQG)
Facility Location: 1935 John Crosland Jr. Way, Charlotte, NC 28208
Facility Address: 1935 John Crosland Jr. Way, Charlotte, NC 28208
Telephone Number: 704-496-6810
County: Mecklenburg

2. AUTHOR OF REPORT: Heather Goldman, Environmental Senior Specialist, NCDEQ
980-224-9858 heather.goldman@ncdenr.gov
Date of Report: March 16, 2016

3. FACILITY CONTACT: Richard Painter, Research Director
Office: 704-496-6815

4. SURVEY PARTICIPANTS:

Heather Wright – Chemist; Wesley Schmitt – Technical Service Engineer; Lewis Wright – Facility Manager; Heather Goldman - ESS NCDEQ

5. DATE OF INSPECTION: February 25, 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: Pavco, Inc. (facility) focus is metal finishing technologies through research and development. Customers include finishers and manufacturers. The facility includes an Instrumentation Lab, Corrosion Laboratory, Research and Service Laboratory, and a Pilot Technology Center where research, technical service needs, processing customer sample request, and training are conducted. There are approximately 70 tanks in the Pilot Technology Center for plating, including chrome, copper tin, cadmium, zinc, nickel, alloy passivates, alloy plating, trivalent passivates, hexavalent passivates, Nano based organic coatings, and antimicrobial technologies. The facility generates four basic waste streams including alkaline, acids, chromium, and flammable resins. The facility also generates waste from customer samples that are managed as hazardous waste onsite. The facility does not operate a waste water treatment plant. The facility was notified and operating as a LQG at the time of inspection.

General Information:

- Legal owner of facility: Pavco, Inc.33
- Legal owner of property: SCNB Invest B C, LLC
- Number of Employees/Shifts: One Shift Monday – Friday, 30 Employees
- Water supply (municipal or well): Charlotte Water
- Municipal sewer/septic/on-site treatment facility: Charlotte Water

- Number of on-site wells: None
- Distance to closest off-site well: Approximately 0.1 mile
- Closest private residence: Approximately 600 feet
- Site Acreage: Approximately 1.3 acres

8. HAZARDOUS WASTE (HW) GENERATED:

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

Waste Corrosive Liquid Acidic Inorganic	Nitric Acid	D002, D007
Waste Flammable Liquid	Isopropyl Alcohol	D001
Waste Corrosive Liquid Basic Inorganic	Sodium Hydroxide	D002
Waste Flammable Liquid	Methanol	D001, F003
Waste Corrosive Liquid Acidic Inorganic	Sulfuric Acid	D002
Waste Mercury Compound Solid	Mercury Chloride	D009
Waste Corrosive Liquid Toxic	Phytic Acid, Chromic Acid	D001, D002, D006, D007, U147
Waste Amines Liquid Corrosive	Diethanolamine, Dibenzylamine	D002
Waste Cyanide Solution	Zinc Cyanide, Sodium Cyanide	D003, P106, P121
Waste Corrosive Liquid Basic Inorganic	Sodium Sulfide, Barium Sulfide	D002, D003, D005
Waste Solid	Zinc Dimethyldithiocarbamate	P205
Wastewater Reactive Solid, Self-Heating	Zinc Dust, Calcium Lumps	D001, D003, D006
Waste Environmentally Hazardous Substances	Thioacetamide, Thiourea	U218, U219
Waste Flammable Solids Organic	Activated Carbon, Hexamethylenetetramine	D001
Waste Flammable Liquid, Corrosive	Isobutanol-Dimethyl Acid Pyrophosphate	D001, D002, D035, P102
Waste Oxidizing Solid Toxic	Potassium Dichromate, Ammonium Persulfate	D001, D006, D007
Waste Cyanide Solutions Sodium	Cyanide	D001, D003, D006, D038, F005, P098, P106
Waste Toxic Liquid Organic	Benzyl Chloride, 1,2-Dichloroethane	D038, P028, U197, U218, U328
Waste Toxic Liquid Organic	Cadmium Chloride, Lead Acetate	D005, D006, D007, D010, D011, D030, P075, U197, U226

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>
Chemtron Corp	OHD066060609
<u>TSD Facilities</u>	<u>EPA ID#</u>
Chemtron Corp	OHD066060609

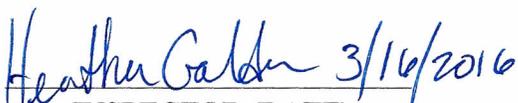
- Weekly Inspections (HW Storage Area) – The facility implemented weekly inspections of the hazardous waste storage (HWSA) area in December 2015. Inspections are conducted weekly (at least every seven days).
- Waste Minimization Plan – The facility maintains a written waste minimization plan that was revised on January 25, 2016.
- Biennial Report – The facility submitted their 2015 biennial report on 2/19/2016.
- Emergency Preparedness – The facility is maintained in a manner to minimize the risk of fire. The facility utilizes Fire Protection Incorporated to conduct annual fire extinguisher inspections and maintenance. The facility mailed out request for emergency arrangements with local authorities on January 5, 2016 and December 9, 2015, including Carolina HealthCare System, Charlotte Mecklenburg Emergency Management, and Charlotte Fire Department. Lewis Wright is the Primary Emergency Coordinator and Wes Schmitt is the Secondary Emergency Coordinator.
- Contingency Plan – The facility maintains a Contingency Plan that was developed on December 1, 2015 and most

recently revised on February 25, 2016.

- Training – External hazardous waste training, conducted by Chemtron Corporation, was attended by Lewis Wright, Wesley Schmitt, and Richard Painter on July 9, 2015. The facility provided hazardous waste training, including Contingency Plan review for each employee managing hazardous waste on January 28, 2016. The facility provided job titles and job descriptions for all employees managing hazardous waste.
- Satellite Accumulation Areas (SAAs) – One 5-gallon container of waste aerosol cans was accumulated in the Mezzanine Sample Storage area. The container was closed and labeled.
- Hazardous Waste Storage Areas (HWSA) – The facility maintains the Pilot Technology Center (Pilot Line area). At the time of inspection there were three 55-gallon containers of hazardous waste stored in the area. The oldest date observed was 2/3/2016. The floor was demarcated to ensure aisle space is maintained. All containers were labeled, dated, and closed. Each container was on a spill cart. Safety equipment, including a fire extinguisher, spill kit, and eye wash were located in the area. An air horn is located in the area to provide immediate access to a communication device.
- Non-Hazardous Waste Streams – Waste determinations must be made at the point of generation and maintain supporting documentation. The facility is in the process of analyzing waste streams to provide supporting documentation for waste determinations.
- Used Oil – The facility does not generate used oil.
- Universal Waste – Used lamps and used batteries are stored in the Mezzanine Sample Storage area. There were two 4-foot boxes of used lamps that were closed, labeled, and dated as 2/15/2016. There were three 1-gallon containers of used batteries that were closed, labeled, and dated as 2/15/2016.

10. SITE DEFICIENCIES: None.

11. COMMENTS AND RECOMMENDATIONS: The facility should refer to the NCDEQ Hazardous Waste Section Technical Assistance Guidance page located at <http://deq.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.

 3/16/2016
INSPECTOR (DATE)

By E-Mail _____
FACILITY CONTACT

cc: Rick Painter – Pavco Inc. via e-mail at rpainter@pavco.com
Brent Burch, Compliance Branch Head
Central Office Files