

LASERFICHE FILE TRANSMITTAL FORM
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

Your Name: Andrew Martin

Document Category: Facility

Document Group: Inspection/Investigation (I)

Document Type: Compliance Evaluation Inspection (CEI)

EPA ID: NCD980845366

Facility Name/Subject: Stabilus, Inc.

Document Date: 03/30/2017

Description: CEI Inspection. Comments and recommendations made. No violations.

Author: Andrew Martin

Branch/Unit: Compliance Branch-Western Region

Facility/Site Address:

Facility/Site City:

Facility/Site State: North Carolina

Facility/Site Zipcode:

Facility/Site County: Gaston

File Room Use Only

	Month	Day	Year
Date Received by File Room:			
Date Scanned:			

Scanner's Initial:

--

**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:** Stabilus, Inc.
1201 Tulip Drive
Gastonia, N.C. 28052
NCD 980 845 366
2. **Facility Contact:** Michael Ellington, Environmental and Facility Engineer
Phone: 704-616-5281 Email: Mellington@us.Stabilus.com
3. **Survey Participants:** Mr. Michael Ellington
Mr. Andrew Martin, Environmental Senior Specialist
Ms. Heather Goldman, Environmental Senior Specialist
4. **Date/Time of Inspection:** March 30, 2017 / Arrived: 10:05 am Departed: 2:30 pm
Date of Report: April 20, 2017 - Prepared By: Andrew Martin
5. **Purpose of Inspection:** To determine compliance with NC Hazardous Waste Management Rules
6. **Report:**

On March 30, 2017 Mr. Andrew Martin and Ms. Heather Goldman conducted an unannounced compliance inspection at Stabilus, Inc. located in Gastonia, NC. The facility has approximately 355-employees, operates on three shifts and is 201,000 square feet in size located on 18 acres. The facility receives potable water from the local municipal water supply and discharges waste water to the local POTW. The closest private residence is approximately a half a mile away. The distance to the closest drinking water well is unknown. The facility manufactures nitrogen gas springs primarily for the automotive industry. The gas springs are used as lift springs for automotive hoods and trunks. The facility also manufactures gas springs for a variety of industrial equipment.

Hazardous waste is primarily generated from painting operations from two electrostatic paint booths. The facility generates spent caustic and acid waste solutions and nickel/cyanide salt waste from the Nitride Operation, which is a heat activated chemical case-hardening process conducting on gas spring housings. The facility is currently in the process of decommissioning and decontaminating the Nislide Process Unit as it is no longer in use.

The facility is currently listed as a large quantity generator (LQG). Based on the facility's hazardous waste manifests, the facility alternates between operating as a small quantity generator (SQG) and LQG throughout the year. The facility appeared to be operating as a LQG at the time of this inspection.

7. **Hazardous Waste Types:**
 - D001/F003/D035, waste paint material
 - D001, waste paint material
 - D002, waste potassium hydroxide
 - P074/D003/F008/D001/D002, waste corrosive liquids (Nislide Waste)
 - D001/U154/U161, waste flammable liquids
 - D003/P074, waste corrosive solids (sodium hydroxide, nickel cyanides)
 - D003/F003/U112, waste paint related material (Acetone, Ethyl-Acetate)

8. **Areas of Inspection:**

Manifests:

All hazardous waste manifests were reviewed for 2017, 2015 & 2016. The manifests reviewed were in good order and documented approved transporters and TSD facilities. Land Disposal Restriction forms were available.

Transporters: Allworth LLC – ALD 094 476 793
US Env, Inc. – PAR 000 524 041
Republic Env Sys, LLC – PAD 982 661 381
Freehold Cartage, Inc. – NJD 054 126 164
Action Resources – ALR 000 007 237
Haz-Mat Environmental Services, LLC – NCD 048 461 370
Chemtron Corporation – OHD 066 060 609

TSDs: Allworth, LLC – ALD 094 476 793
Republic Environmental Systems (PA), LLC – PAD 085 690 592
Chemtron Corporation – OHD 066 060 609

Waste Minimization:

The facility maintains a written waste minimization program as a component of their ISO Management Program. The program lists objectives and targets for the minimization of hazardous waste.

Weekly Inspections:

The facility currently conducts and documents weekly inspections at the Central Hazardous Waste Storage Area. Mr. Randy Costner & Mr. Steve Parris perform the container inspections. **It is a reminder that weekly inspections must be conducted at least every seven (7) days. It is also recommended that the facility document on the weekly inspection form the number of hazardous waste containers stored in the area at the time of inspection.**

Emergency Preparedness:

The facility is equipped with a P/A system, fire extinguishers, pull stations, audible alarms, heat sensors, spill response equipment, and a sprinkler system. The local fire department conducts periodic inspections at the facility. The emergency equipment is also inspected on a regular basis. The facility has made emergency arrangements with local authorities through submittal of their hazardous waste contingency plan and letters sent requesting agreements on November 18, 2014. The facility's emergency coordinator is Mr. Michael Ellington and the alternate coordinator is Mr. Todd Ledford. The facility is operated to minimize the possibility of a release or fire from hazardous waste.

Training:

The facility maintains a RCRA training program. The program is conducted by Mr. Michael Ellington by PowerPoint. Mr. Michael Ellington last attended RCRA training through Safety Compliance Management on March 14, 2016 and is scheduled to take the course again on March 31, 2017. A training outline was available for review and included waste identification and waste management training topics. The training also included universal waste and used oil topics. The training program includes training on the contents and implementation of the facility's contingency plan. Mr. Ellington explained that the facility's RCRA training course is presented to four employees that handle/manage hazardous waste. The last documented training session was on February 28, 2017. Job titles and descriptions were available at the time of the inspection. The facility has posted emergency equipment locations and the names and phone numbers for the emergency coordinators at various locations around the plant including in the hazardous waste storage area. **It is a reminder that Michael Ellington's RCRA job description should include his hazardous waste and Primary Emergency Coordinator job duties . It is also a reminder that training RCRA training is required to be conducted once a year or every 365 days for all hazardous waste handlers and emergency coordinators.**

Biennial Report:

The facility submitted a 2015 Biennial Hazardous Waste Report on February 26, 2016. The report was onsite and available for review.

Contingency Plan:

The facility keeps a contingency plan on-site. The plan was last revised in April 2014 and lists the facility's emergency coordinators home phone numbers and addresses; describes the type and location of emergency equipment available at the facility; lists emergency response procedures, spill response, evacuation procedures, and emergency coordinator job duties; and describes the emergency arrangements with local response agencies. The revised plan was submitted, along with emergency arrangement request letters, to local authorities on November 18, 2014 (See Comment Section). The plan also includes a facility layout that has emergency equipment, fire alarm locations, and evacuation routes. The facility has posted emergency equipment locations and the names and phone numbers for the emergency coordinators. The information is posted at various areas around the facility including the hazardous waste storage area. **It is a reminder that the contingency plan must describe all alarms and announcements used to initiate an evacuation (i.e. what does it sound like). It is also a reminder that the plan must show primary and secondary evacuation routes from the Hazardous waste storage area and show/describe the locations/type of emergency equipment in the area.**

Accumulation Areas:

1. Body Paint Area – There was one 55-gallon container of paint waste located in this area. The container was properly labeled and properly closed at the time of the inspection. The container was also observed to be grounded. **It is a reminder that the label on the container must be visible at all times.**
2. Nislide Area – Nislide treatment unit #2 ceased operation in February 2017 and is currently being decommissioned and decontaminated. Waste will be generated in this area from the cleaning of the pots during decontamination.
3. Maintenance - There was one 55-gallon container of Universal Waste lamps located in this area. The container was properly labeled and closed. The maintenance area also generates empty aerosol containers (see Comment Section). **It is a reminder that universal waste lamps must be stored inside a closed and structurally sound container.**

Hazardous Waste Storage Area:

Central Hazardous Waste Storage Area - The storage area is located in an outside building behind the facility. The building is labeled with a "No Smoking" and a "Hazardous Waste Storage Area" sign. The area is equipped with a spill kit, phone, fire extinguisher and eye wash station. There were five (5) 55-gallon containers of hazardous waste, two (2) 55-gallon containers of non-haz stripper dust, and two (2) 55-gallon containers of oily waste in storage. The containers were all properly labeled, closed, and dated at the time of the inspection. The area is located within a concrete secondary containment structure. Employees carry cell phones while in the area. A 5-gallon container labeled as unknown waste was located in the storage area. Mr. Michael Ellington stated that the container was found on a trailer and that they are in the process of performing a waste determination. **It is reminder that the container must be labeled as "Hazardous Waste" with the recommended words "Pending Analysis" until the waste determination is complete.**

Used Oil:

The facility generates used oil from the maintenance of machinery. The facility maintains one 2000-gallon used oil tank for the collection of used oils. The tank is located in the Scrap Metal Area and was properly labeled as "Used Oil" at the time of the inspection. Non-hazardous/ Non-regulated Used Oil is sent to Haz Mat Environmental, LLC for solidification and recycling. The last documented shipment occurred on September 9, 2016. **It is a reminder that the trench system located inside the oil storage**

room should be kept free of used oil spills and it is recommended that the trench be cleaned and checked for integrity. Spills from leaking pumps and machinery should be cleaned up immediately.

Universal Waste

One (1) box of universal waste lamps was observed in the Central Hazardous Waste Storage Area. The container was closed, labeled and dated March 8, 2017.

9. Site Deficiencies:

- None

10. Comments:

- It is a reminder that when changes are made to the facility's RCRA contingency plan, which require submittal of the revisions to local authorities, revisions must be submitted to local authorities .
- Waste aerosol cans could be listed as a hazardous waste in one of three ways: 1) the can itself due to reactivity [empty can could detonate or explode], 2) the liquids product contained within the can, and 3) the gaseous propellant. Depending on how the cans are managed will determine if they are excluded or subject to the full hazardous waste regulations. A steel aerosol can that does not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)), and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(iv) if it were to be recycled. The can would need to be punctured and drained in order to be subject to the recycling exemption and the liquids/gases from the puncturing process would need to be managed per the appropriate regulations. It is a reminder that the facility ensure that it is properly managing spent or used aerosol cans.
- It is strongly recommended that universal waste management topics be included in the facility's annual RCRA training program.

Andrew Martin 4-20-17

**Andrew Martin, QEP / DATE
NC HWS-COMPLIANCE BRANCH**

**SENT BY E-MAIL
FACILITY CONTACT**

CC:
Sean Morris, Western Area Compliance Supervisor
Central Office Files
Mr. Michael Ellington, Stabilus, Inc.