

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

Your Name: Jenne Walker

Facility ID Number: NCD067427922

Facility Name: Moen Incorporated

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File Description/Comments: LQG operating as SQG, no violations

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County (if not on report): Lee

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

RCRA COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Name: Moen, Inc.
EPA ID Number: NCD 067 427 922
Type of Facility: listed as Large Quantity Generator (LQG)
Operating as Small Quantity Generator (SQG)
County: Lee
Physical Location: 2609 Cox Mill Road
Sanford NC 27330
Mailing address: (same as physical address)

2. FACILITY CONTACT INFORMATION:

John West, Environmental Coordinator – Moen
(919) 258-3341 ext 4318, jwest@moen.com

3. SURVEY PARTICIPANTS:

John West – Moen
Zina Briner – Environmental Coordinator, Moen
Zina.briner@moen.com
Jenne S. Walker- NCDEQ

4. DATE OF SITE VISIT: February 17, 2016

5. PURPOSE OF SITE VISIT:

An un-announced on-site evaluation was conducted to determine the facility's compliance with the hazardous waste management regulations which are collectively known as the Resource Conservation and Recovery Act (RCRA regulations). The RCRA regulations can be found at Title 40 of the Code of Federal Regulations (40 CFR) Parts 260-270, 273 and 279 and at 15A NCAC 13A.

6. FACILITY DESCRIPTION:

The Moen plant in Sanford manufactures various types of plumbing hardware and bath fixtures, such as water faucets. The facility is listed with the Division as a Large Quantity Generator (LQG) of hazardous waste but has been operating as a Small Quantity Generator since May 2015. Since the last inspection, the facility has eliminated the cyanide containing waste stream by process substitution.

General Information:

1. **Legal owner of business and property:** Moen, Inc.
2. **Area of occupied space:** ~ 350,000 square feet
3. **Land area:** ~ 40 acres
4. **Operating shifts:** Three shifts, facility operates 24 hours per day, 6 days per week
5. **Number of employees:** ~ 340

6. **Sanitary Sewer and Potable Water supply:** City of Sanford
7. **Ground water monitoring wells on site:** 20
8. **Distance to closest off-site well:** Unknown
9. **Distance to closest private residence:** ~ ¼ mile
10. **Other:** The facility holds an Industrial User Permit (for pre-treatment of industrial wastewater) with the City of Sanford which allows the facility to discharge treated wastewater to the Big Buffalo WWTP. [NAICS Code # 332913 – Plumbing fixture fitting and trim manufacturing]

7. WASTE STREAMS:

The following waste streams are routinely generated:

Non-hazardous or other types of waste:

Metal hydroxide sludge (non-hazardous per variance, is sent to smelter in Canada)
Used Oil; Universal Waste – used batteries and used fluorescent lamps; E-waste

Hazardous waste (HW):

D001 – waste aerosols
D001, D007, D008 – waste combustible liquid (naphtha, lead)
D001, D005, D007, D008, D035 – waste paint
D002 – waste corrosive liquid, basic, organic (potassium hydroxide)
D002, D005, D007, D008 – HW liquid (waste chromic acid solution -chromium, lead)
D008 – hazardous waste solid (lead)

The following waste streams have been generated since the last inspection but **are no longer generated on-site:**

D003 – waste cyanides, inorganic, solid (copper cyanide)
D003, F007 – waste cyanide solution (potassium cyanide)

8. AREAS OF REVIEW AND INSPECTION:

RECORDS REVIEW

Contingency Plan (CP) – The facility’s contingency was revised on January 20, 2014. The CP was reviewed and found to be satisfactory. Copies of the Contingency Plan were sent to local emergency responders in February 2014 as documented by green cards/Certified Mail. John West is the Primary Emergency Coordinator (EC) and Andrew Tyo is the Alternate EC.

Arrangements with Local Authorities – Letters were sent to local authorities via Certified Mail dated January 20, 2014 to make emergency response arrangements. Copies of letters were on-file and available for review to document the facility’s compliance with this requirement. Letters were sent to the Sanford Police Department, Sanford Fire Department, Lee County Emergency Management, Central Carolina Hospital, and NC DWQ.

Emergency Preparedness – The facility is equipped with fire extinguishers, pull alarms, fire suppression system (sprinklers) and communication equipment is available to staff at all times (facility wide PA system, air horn, cell phones). A landline telephone is located near the 90-day hazardous waste storage area and emergency information was posted near the telephone.

Inspection Records (for all hazardous waste storage areas) – Weekly Inspections are typically conducted and documented by John West. Inspection records were reviewed and found to be complete and in good order.

Biennial Report – The facility’s last Biennial Report was available for review as required.

Manifests & LDRs – Manifests and LDRs generated since the last inspection were reviewed and found to be satisfactory. Hazardous waste was most recently picked up from the facility on 9/28/2015. The following hazardous waste management vendors were utilized:

Transporters: A & D Environmental Services, LLC – SCD 987 598 331 and
NCD 986 232 221

TSD's: Envirite of Ohio, Inc – OHD 980 568 992
Ecoflo, Inc. – NCD 980 842 132
Clean Harbors Deer Park, LLC – TXD 055 141 378

Training Records – Training records were reviewed for employees with hazardous waste related job duties. Annual HazWoper training was provided to facility staff in February 2015; Annual RCRA Training and Contingency Plan Review were provided on 3/15/15. John West attended the annual Lee County EHS Managers RCRA training in March 2015 given by Dan Young/EHS Associates.

Job Descriptions – Job descriptions were on file and reviewed for employees with hazardous waste related job duties. Satisfactory.

PHYSICAL INSPECTION/FACILITY WALK-THROUGH

Hazardous Waste (HW) Satellite Accumulation Areas (SAAs) – At the time of the inspection, SAAs were observed at the following locations:

1. Chemical Storage Room 3 “Waste Paint SAA” - No hazardous waste was observed in storage.
2. Wastewater Storage Area – One 55-gallon drum for collecting un-punctured waste aerosol cans; One empty 5-gallon bucket for accumulating broken fluorescent lamps.

In addition, one cubic yard box of Electronic waste (E-waste) was observed in the Wastewater Storage Area. All containers of hazardous waste observed in satellite accumulation were closed, clean, properly labeled and in good condition.

Note: The Cyanide Pit SAA has been eliminated.

Less than 90 Day Hazardous Waste Storage Area

Chemical Storage Room 3/Main Hazardous Waste Storage Area – No containers of hazardous waste were observed in storage.

Note: The Waste Cyanide Storage Area has been eliminated.

Used Oil – One 1,100-gallon used oil tank was located in the Machining Oil Building; One 300-gallon tote of used oil was located in 'Buffing & Texturing'; and one 55-gallon drum of used oil was located in Molding adjacent to the water-oil separator. The used oil storage tank and all containers were properly labeled "Used Oil" and good housekeeping was noted.

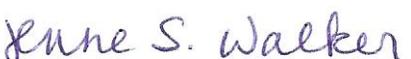
Universal Waste – Used fluorescent lamps and used batteries are generated on-site. Three large (green painted) wooden boxes located outside the chemical storage room are used for storage of universal waste lamps. A log is kept to document shipment dates and on-site storage time. No used batteries were stored on-site at the time of the inspection.

9. WASTE MINIMIZATION

The facility keeps a written waste minimization plan. The facility eliminated the cyanide containing process in 2014 and since then has operated as a Small Quantity Generator.

10. CONCLUSION:

The cooperation and assistance provided by John West and Zina Briner was greatly appreciated during the inspection. Please contact me at 919-707-8224 or jenne.walker@ncdenr.gov if you have questions about this report or maintaining compliance with the hazardous waste management (RCRA) regulations.



Jenne S. Walker
Environmental Senior Specialist, NCDEQ

signed March 11, 2016