

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

Your Name: WILLIAM HUNNEKE

Facility ID Number: NCD980602445

Facility Name: MOEN INCORPORATED

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: Now a SQG. No violations.

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County (if not on report): CRAVEN

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

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY INFORMATION:

Facility Name: **MOEN INCORPORATED**
EPA ID Number: **NCD980602445**
Type of Facility: Small Quantity Generator (SQG)
Facility Location: 101 Industrial Drive, New Bern NC 28562
Craven County
Mailing Address: 101 Industrial Drive, New Bern NC 28562
Telephone Number: 252-638-3300
Property Owner: Stanadyne, Inc.
Property Owner Address: 25300 Al Moen Drive, North Olmsted, OH 44070
Legal Owner of Business: Moen Incorporated - 25300 Al Moen Drive,
North Olmsted, OH 44070

FACILITY CONTACT: Katie Fritzler, Sr. HR Specialist, EHSS
Phone Number: 252-638-3300 ext.6341
Email Address: katie.fritzler@moen.com

PARTICIPANTS:
Representing Moen: Katie Fritzler
Representing NCDEQ: William Hunneke

DATE OF SITE VISIT: **March 9, 2016** onsite: 1330 hrs. offsite: 1440 hrs.

PURPOSE OF SITE VISIT:

Unannounced compliance evaluation inspection to determine compliance with regulations described at 40 CFR 261, 262, 264, 265, 268, 273 and 279. The last CEI was performed on December 12, 2014.

FACILITY DESCRIPTION:

Moen Incorporated is a manufacturer of plumbing fixtures including faucets and trim. The New Bern facility is composed of one building approximately 208,000 square feet in size on a 29 acre site. The facility has a braising operation and a painting operation. The company formerly generated a solid clay-like sludge material consisting of copper hydroxides, zinc hydroxides, cadmium hydroxide and copper sulfate which were recycled, a D008 copper sulfate solution from its bright dipping tanks, and a D008 hazardous waste liquid from its metal treatment process. The company is in the process of completing a reorganizing of its work flow and production floor and as a result, the bright dipping tanks have been removed and the waste streams mentioned above are no longer generated. The plant re-notified as a small quantity generator (SQG) of hazardous waste in December 2015 and appears to presently be operating as such. The facility has approximately nine-hundred and fifty employees (including 350 temporary positions) operating over three shifts. Municipal water and sewer are provided to the plant by The City of

New Bern. There are no known wells onsite. The distance to the nearest off site well is unknown, and the distance to the nearest residence is less than one half mile.

WASTE STREAMS INCLUDE:

Hazardous Waste Streams and Waste Codes:

- | | |
|---|----------------|
| • Waste Paint Related Material | D001/D035 |
| • Waste Flammable Organic Liquid, (used paper wipes: acetone/toluene) | D001/F003/F005 |
| • Waste Combustible Liquid, Petroleum Naphtha Lead | D008 |
| • Waste Aerosols | D001/D035 |
| • Hazardous Waste Lead (from decommissioning hoods & piping) | D006/D007/D008 |

Other Waste Streams:

- Used Oil
- Used Batteries
- Used Lamps
- Scrap Metal

AREAS OF REVIEW AND INSPECTION:

Emergency Preparedness/Arrangements with Local Authorities:

The facility appears to be operated to minimize the possibility of fire or any unplanned sudden or non-sudden release of hazardous waste to the environment. To that end, the facility has numerous spill kits and fire extinguishers placed every seventy-five feet throughout the facility and a system in place to alert and notify facility occupants in case of an emergency. The facility has sent letters to make arrangements with local emergency authorities including, fire, police, and local hospital all of which have been reviewed and observed to be in compliance.

Contingency Plan:

The facility still maintains its contingency plan from when it was a large quantity generator of hazardous waste. The plan is maintained on site and includes a description of the actions personnel will take to respond to emergencies including spills, fires and explosions. The plan was last updated on March 4, 2014 and copies of the plan and were sent to emergency authorities immediately thereafter. The contingency plan includes a list of emergency coordinators (Katherine Fritzler Primary Emergency Coordinator, Paul Faucett Alternate Emergency Coordinator) with their home and work addresses and phone numbers, description of the signal used to begin evacuation of the facility, a physical description of the emergency equipment used at the less than 180-day storage areas in the event of an emergency with the location of the equipment and a brief description of the capabilities of the equipment and a description of the evacuation routes from the less than 180-day storage area are also included. The plan was reviewed and is compliant with LQG rules. The facility also maintains a small quantity generator compliant contingency plan which is posted next to the phone adjacent to the facility's hazardous waste storage area and includes: the name and phone number of emergency coordinator; the location of fire extinguishers, spill control equipment, and fire alarms; and the number to the fire department even though there is a direct alarm

Training Records:

The Company trains a limited number of individuals as hazardous waste handlers and continues to do so on an annual basis. On the day of the inspection, documentation of training for all individuals with hazardous waste duties was observed to be in compliance and completed within the last 364 days. According to Ms. Fritzler, the group is scheduled for training March 17, 2016.

Manifests / LDR:

Hazardous waste manifests were reviewed from December 2014 through the present and observed to be in compliance and complete with Land Disposal Restriction documents.

Transporters:

Companies that transport hazardous waste for the facility include:

- EcoFlo, Inc. NCD980842132
- Envirite of Ohio, Inc. OHD980566992

TSD's:

Facilities that dispose of hazardous waste for the facility:

- A&D Environmental NCD986232221
- Michigan Disposal Waste Treatment Plant MID000724831
- Envirite of Ohio, Inc. OHD980568992
- DART Acquisitions, LLC NCD121700777

Inspection Records (storage):

Weekly inspection records for the less than 180-day hazardous waste storage area were reviewed from December, 2014 through the present and observed to be complete and included checks for container condition and leaks. Satellite accumulation areas are also inspected and the logs reviewed indicated that the inspections had been performed at least every seven days.

Biennial Report:

The facility operated as a large quantity generator for part of calendar year 2015 and as a result submitted a biennial report to the Hazardous Waste Section on February 11, 2016.

Accumulation Areas:

The facility currently has two satellite accumulation areas (SAA) not including numerous small metal step cans used for the temporary accumulation of solvent wipes, swabs and associated PPE. The two SAAs include the pad printing area and an aerosol can puncture station.

Pad Printing Area:

On the day of the inspection, there was one 55-gallon drum of paint waste and one 5-gallon step can containing paper wipes observed in the pad printing area, both properly closed and labeled.

Aerosol Can Puncture Station:

Located in the less than 180-day hazardous waste storage area, referred to as "The Cage", one 20-gallon drum used to accumulate aerosol can waste was observed, properly closed and labeled. Next to the can puncture station was a similar sized step can containing used aerosol cans awaiting puncture which was observed properly labeled and closed

Storage Areas:

The facility's less than 180-day hazardous waste storage area is a fenced area approximately 300 square feet in size that is locked and used to store hazardous waste, universal waste, used oil and as previously mentioned the aerosol can puncture station and spent aerosol cans awaiting puncture. A fire extinguisher and spill kit are located on the outside of the cage, available to all. On the wall immediately outside the caged area is a telephone with the SQG contingency plan posted. On the day of the inspection, the hazardous waste cage storage area contained several 55-gallon drums of rags and paint related waste, the can puncture station, and small container of spent aerosol cans all observed to be properly closed, labeled

and dated. Proper aisle space was observed around all hazardous waste containers. Universal waste lamps and batteries are also stored in the cage and were properly closed and labeled. Also located inside the cage were several 55-gallon drums of non-hazardous waste water and two 55-gallon drums properly labeled "Used Oil".

USED OIL/ UNIVERSAL WASTE:

Stored in the cage and described above.

SOLVENT CONTAMINATED WIPES:

Used paper wipes are currently managed as hazardous waste and may contain any of the following: "Wash-Up" (toluene/acetone); isopropyl alcohol; or paint thinner. The solvent used is dependent upon the task. The facility would like to employ the solvent contaminated wipes exclusion sometime around the end of 2016 if applicable. The facility's solvent contaminated wipes waste stream currently includes cotton swabs and light rubber gloves (PPE). The facility has asked for a clarification as to whether those items would need to be segregated out for the company to be able to employ the solvent contaminated wipes exclusion. Per the definition described in 40 CFR 260.10; "wipe" means 'a woven or non-woven shop towel, rag, pad, or swab made of wood pulp, fabric, cotton, polyester blends, or other material'. Under this definition, PPE such as rubber gloves would have to be removed from the waste stream to begin to look at the exclusion. The solvent contaminated wipe exclusion is not applicable to wipes that contain listed hazardous waste other than solvents, or exhibit the characteristic of toxicity, corrosivity, or reactivity due to contaminants other than solvents (such as metals). The solvent contaminated wipes exclusion can apply to wipes contaminated with trichloroethylene, but these wipes may only be laundered and are prohibited from being landfilled. The solvent contaminated wipes exclusion rules are described at 40 CFR 261.4(b)(18).

WASTE MINIMIZATION:

The facility generates sizable amounts of used cardboard which is compacted and recycled. Small amounts of brass from faucet parts are recovered and recycled. Shrink wrap and associated plastics are also recycled. Information is provided with this report regarding application for tax certification and exemption for solid waste recycling or resource recovery facility or equipment.

External Condition of Facility:

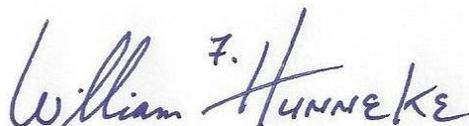
No adverse conditions were observed.

RECOMMENDATIONS/ACTION ITEMS:

No recommendations or action items are offered as a result of the inspection.

SITE DEFICIENCIES:

No site deficiencies were noted or observed during the inspection.



William Hunneke
Environmental Senior Specialist, NCDEQ

March 10, 2016
Date

Copy of report provided to facility contact

Guidance documents provided with report:

Tax certification information for recycling and exemption for solid waste recycling or resource recovery facility or equipment including documents and contacts may be found at the Department of Environmental Quality's website under the Solid Waste Section at the following link:
<http://deq.nc.gov/about/divisions/waste-management/solid-waste-section/tax-certification-program>