

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

Your Name: Phil Orozco

Facility ID Number: NCD986215465

Facility Name: JMC (USA), Inc.

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: LQG - No violations cited. Company has ceased operations.

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Author(s) of Document: Phil Orozco

Inspector ID #: NC018

Suborganization: Eastern Region

County (if not on report): DURHAM

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

COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Name: **JMC (USA), Inc.**
EPA ID Number: **NCD986215465**
Type of Facility: **Large Quantity Generator (LQG)**
Facility Location: One Innovation Drive
RTP, NC 27709
Telephone Number: (919) 549-4150

2. FACILITY CONTACT: Randi Davis rdavis@jmcusa.com

3. SURVEY PARTICIPANTS:

Randi Davis, Environmental Health & Safety Manager
Phillip G. Orozco, Environmental Senior Specialist – NCDEQ (Inspector)

4. DATE OF INSPECTION: March 3, 2016

5. PURPOSE OF INSPECTION:

This was an unannounced audit to determine compliance with regulations described at Chapter 40 of the Code of Federal Regulations, (40 CFR) Parts 260-270, 273, 279; and, Title 15A Chapter 13 of the North Carolina Administrative Code (NCAC). Previous inspections occurred on March 4, 2015, March 27, 2013, and December 21, 2011.

6. FACILITY DESCRIPTION:

JMC manufactures a wide range of chromium metal products to the electronics, super alloy, and welding rod industries as well as specialty products for custom applications. Current uses for high purity products include sputtering targets for LCDs, photo masks, computer hard disks, and vapor deposition sources for semiconductor manufacture.

The company ceased operations in September 2012 due to excess production prior to that time and a reduction of sales since that time. Tanks have been emptied and sludge from the bottom of the tanks has been removed. The company will remain a LQG because one process has not been taken off-line and could possibly be used if a special order came in.

Hazardous waste (HW) was being generated during the manufacture of high purity chromium metals by electrolysis.

GENERAL INFORMATION:

- Legal owner of business: Japan Metals & Chemicals, Ltd.
- Legal owner of property: JMC (USA),INC.
- Square footage of occupied space = 12,080 Sq Ft
- Acreage = 10.78 Acres
- Operating Shifts = 1
- Number of Employees = 2 Full-time; 2 half-time
- Areas Inspected: Facility building, SAAs, HW storage
- Water Supply: Municipal (Durham County)
- Municipal sewer/septic/On-site treatment = On-site waste water treatment facility for treating water from production area, discharged with office area wastewater to the POTW

- Number of on-site water wells = 0
- Ground water monitoring sites on-site: No
- Distance to closest off-site well: Unknown
- Closest private residence (Google earth) = Approx. 2,500 feet

Names & Job Titles of those who are involved in hazardous waste management:

Ken Sakamachi, President

Ultimate responsibility for the facility; Primary Emergency Coordinator

Glenn Dunn, Office Manager (now working 1-2 days/week)

Public Relations, alternate for President and Safety Officer; Alternate Emergency Coordinator

Randi Davis, Safety Officer and Laboratory Tech

Record keeping, reporting, coordinate with governmental agencies

Dorothy McGinty, Administrative Assistant

HW labeling, time management

Harvey McLean, Production Team Leader and Waste Water Treatment System Operator

WWT operation, HW collection, storage, inspection; Alternate Emergency Coordinator

Gordon Hyatt, Waste Water Treatment Assistant

Assists Team Leader and operates WWT under supervision

7. HAZARDOUS WASTE (HW) STREAMS INCLUDE:

Alkaline / lead acid/ and NiMH batteries – Recycled

Lamps – all green tip, will be recycled as needed.

The only waste on site at the time of inspection were the following:

F006, D007 Waste water treatment sludge (filter cake);

F006, D007 PPE;

Waste Water is treated, then discharged to POTW in accordance with permit).

Prior to shut down, the following additional wastes were generated:

D002, D007 Spent acid wash;

D002, D007, D008 Spent caustic (aluminum tank cleanout);

D002, D007, D008 Electrolysis tank electrolyte (liquid or sludge);

D007, D008 Anode cleaning waste.

8. AREAS OF REVIEW AND INSPECTION:

- **Emergency Preparedness and Arrangements with Local Authorities** – In compliance. Parkwood Fire Dept. tours the facility twice per year; a private physician is contracted by the company to assist in all medical needs. In 2010, I provided Dorothy McGinty of JMC with an electronic copy of the Hazardous Waste Section's example letters to emergency responders. These letters were sent out to the appropriate agencies on 5/19/09.
- **Contingency Plan (CP)** –Revisions to the plan are currently waiting for review by Ken Sakamachi. Randy Davis is now the Primary Emergency Coordinator. Harvey McLean is the alternate.
- **Inspection Records** (storage) - JMC maintains a log book stating on a weekly basis that no leaks were observed and stating the condition of containers. Records were complete.
- **Manifests / LDR** – Complete.
- **Training Records** –
Records maintained on site indicate that Hazcom/HW management and contingency plan implementation training was completed by Randi Davis, Harvey McLean, Glenn Dunn and

Ken Sakamachi on 11/27/13, 12/30/14 and 12/21/15. Training exceeded 365 between 2013 and 2014 by 32 days. A citation was not issued due to the fact that operations have ceased and only the clean-out of tanks occurred during that time.

- **Job Descriptions** – Current job descriptions on file for all those individuals in the HW management program were rewritten in July of 2009.
- **Biennial Report** – Not reviewed.
- **Past Transporters included:**
A&D Environmental SCD 987 598 331
Hazmat Transportation and Disposal NCR 000 003 186
Freehold Cartage Inc. NJD 054 126 164
- **Past TSD's included:**
Chemtron Corp. OHD 066 060 609
Ecoflo NCD 980 842 132
- **Satellite Accumulation Areas (SAA):**
Anode Cleaning Tanks – one 55-gallon container, *not in use*;
Anode Bag House – one 55-gallon container, *not in use*;
Wastewater Treatment Filter Press – one 55-gallon container;
Chemical Storage Area – one 55-gallon container containing PPE;
Chromium Bag House - one 55-gallon container (It takes more than a year to fill this container.) *Not in use*;
Laboratory – on trash can type container used for contaminated PPE;
One 30-gallon poly container - used for contaminated PPE.
- **Storage Areas:**
Storage of 55-gallon containers is maintained next to the wastewater treatment system inside the manufacture area. No HW was in storage. The company has ceased operations.
- **External Condition of Facility:** No adverse conditions were observed.

9. **WASTE MINIMIZATION:**
A written plan is in place.

10. **SITE DEFICIENCIES:**
No Deficiencies.


Phillip G. Orozco

Environmental Senior Specialist, NCDEQ

Date: March 4, 2016