

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

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

RCRA COMPLIANCE ASSISTANCE VISIT (CAV) REPORT

1. FACILITY INFORMATION

Name: Coty, US, LLC
EPA ID Number: NCD 990 883 175
Type of Facility: Large Quantity Generator (LQG)
Facility Location: 1400 Broadway Rd
Sanford, NC 27332
Telephone Number: 919-895- 5184
County: Lee

2. FACILITY CONTACT: David Vann, Manager of Regulatory Affairs - Coty
(919) 895-5184 – office telephone; david_vann@cotyinc.com

3. SURVEY PARTICIPANTS: Neil Cutler, WWTP Operator - Coty
Jenne Walker, NC DENR - DWM

4. DATE OF SITE VISIT: February 17, 2016

5. PURPOSE OF SITE VISIT

A site visit was conducted to provide compliance assistance with the hazardous waste management regulations (also known as the Resource Conservation and Recovery Act or RCRA regulations), which are described at Title 40 of the Code of Federal Regulations (40 CFR), Parts 260-270, 273 and 279 and 15A NCAC 13A.

6. FACILITY DESCRIPTION

Coty's Sanford Plant is a cosmetics and fragrance manufacturing facility. The facility operates as a Large Quantity Generator (LQG) of hazardous waste.

General Information:

1. Legal owner of business and property: Coty, US, LLC
2. Area of occupied space: Nail lacquer filling room: 26,000 ft²
3. Operating shifts: Monday – Fridays (3 shifts) and weekends as needed;
4. Number of employees: ~ 600
5. Water supply & Sanitary sewer provided by the City of Sanford
6. Ground water monitoring wells on site: none
7. Distance to closest private residence: < ½ mile

7. WASTE STREAMS:

Hazardous waste (HW):

D001 – waste flammable liquid (isopropanol, 1-butanol, nail enamel lacquer)

D001 – waste flammable solids (contaminated wipes and debris)

D001 – waste flammable liquid (ethyl acetate, isopropanol)

D001 – waste aerosols

D001, F003 – waste flammable liquid (methyl alcohol)

D001, F003 – waste flammable liquid (isopropanol, butyl acetate)

D001, D035, F005 – waste flammable liquid (methyl ethyl ketone)

Other:

Universal Waste – used fluorescent lamps and batteries

Used Oil

Non-regulated waste (clear glass)

8. AREAS OF REVIEW:

The site visit began with a brief entrance interview and facility tour provided by Mr. Culter. The site visit concluded after a records review.

RECORDS REVIEW

The facility's RCRA required records were readily available for review.

- **Contingency Plan** – The facility's LQG RCRA Contingency Plan was last revised on February 3, 2016. The plan appeared to be very thorough and contained all required elements. David Vann is the Primary Emergency Coordinator (EC) and Neal Cutler and Mario Gomez are listed as Alternate ECs.
- **Arrangements with Local Emergency Response Authorities** - Copies of arrangements made with local authorities were reviewed. Arrangements letters were distributed 4/1/2015 by Certified Mail to the following agencies: Lee County Emergency Management, Sanford Fire Department, Sanford Police Department, Central Carolina Hospital, A&D Environmental.
- **Emergency Preparedness** – The facility is equipped with fire extinguishers, pull fire alarms, spill and first aid kits and an intercom/Public Address system to notify employees in case of an emergency (such as required evacuation). Equipment is routinely tested and maintained, as documented by on-site records.
- **Waste Minimization Plan** – Coty's Sanford plant has a written waste minimization plan. The facility utilizes a mobile distillation service each month to recycle acetone. This recycling process has significantly reduced the quantity of hazardous waste generated.
- **Training Records & Job Descriptions** – Annual RCRA Training was attended by Coty's EHS staff on 3/26/15 (provided by Dan Young, EHS Associates). An annual review of the facility's site specific contingency plan was provided to all staff on September 18, 2015 by David Vann. Training records and job descriptions appeared to be satisfactory.

- **Inspection Records**

Weekly inspections are typically conducted and documented (for the facility's hazardous waste storage areas) by Mario Gomez. Inspection records were reviewed and appeared to be complete and in good order.

- **Manifests/LDRs**

Hazardous waste manifests were reviewed from 2014 – January 2016. Manifests and LDRs were neatly organized and appeared complete. The following vendors have been used for hazardous waste management during the specified time frame:

HW Transporters - Heritage Transport LLC – IND 058 484 114

Ecoflo Inc – NCD 980 842 132

Garco, Inc – NCR 000 135 384

Nexeo Solutions – OHR 000 162 800

Shamrock – NC0 000 942 144

Freehold Cartage Inc – NJD 036 275 626

STAT Inc – NCD 980 779 142

Industrial Waste Services – SCR 000 762 245

HW TSDFs - Ecoflo – NCD 980 842 132

Garco, Inc – NCR 000 135 384

Nexeo Solutions – NCD 061 263 315

Giant Resource Recovery – SCD 036 275 626

- **Biennial Report**

The facility's 2013 Biennial Report was on-file and available for review. The next Biennial Report is due to NC DWM on or before March 1, 2016 (for calendar year 2015 data).

PHYSICAL INSPECTION/FACILITY WALK-THROUGH

The following areas were observed during the physical tour of the facility:

Satellite Accumulation Areas:

1. **Industrial Chemistry (IC) Lab** – Two 5-gallon safety cans were observed under a fume hood;
2. **Lacquer Filling Room** – Seven automated nail lacquer filling stations are located in this room. Each station has multiple 5-gallon cans for accumulating acetone contaminated hazardous waste. *Ensure that each container is clearly labeled with either the words 'hazardous waste' or other words to describe the contents.*

Less than 90 Day Hazardous Waste Storage Areas:

1. **"IC" Area** – One 55-gallon drum of waste methanol was observed in a locked flammables cabinet.
2. **Lacquer Storage Building** – Twenty pallets, each containing four 55-gallon drums of hazardous waste were observed in storage.

3. **Waste Handling/Main Storage Area** – Four 55-gallon drums of hazardous waste were observed stored on pallets (on the floor) or on shelving in the open area.
4. **Lacquer Filling Room** – Two separate hazardous waste storage areas are located in the lacquer filling room. Each station is identical and contains the two containers as follows: One 55-gallon drum of waste flammable solids & one 55-gallon drum of waste flammable liquids;
5. **Acetone Storage Trailer** –Thirteen pallets (each pallet contained four 55-gallon drums) of acetone pending distillation were located in the storage trailer located behind the wastewater treatment plant. **Ensure that at least 24 inches of aisle space is maintained in each HW storage area.**

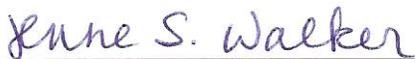
Used Oil Storage: One 55-gallon drum of used oil was observed in the main storage area.

Universal Waste Storage: Three boxes of used fluorescent lamps were observed stored in the facility's main hazardous waste storage area. Each container was closed, in good condition, marked with the words 'universal waste lamps' and marked with an accumulation start date (January 2016).

9. ACTION ITEMS:

1. Be sure the facility maintains adequate aisle space around hazardous waste containers and throughout each of the facility's hazardous waste storage areas. At least 24 inches of aisle space is required.
2. Ensure that all labels and markings on containers of hazardous waste are legible and visible for inspection.

The assistance and cooperation provided by Mr. Neil Cutler was greatly appreciated during the inspection. Please contact Jenne Walker at (919) 707-8224 or jenne.walker@ncdenr.gov if you have any questions about this report or maintaining compliance with the hazardous waste management (RCRA) regulations.



Jenne S. Walker

Environmental Senior Specialist, NCDEQ

Signature date: 3/14/2016