

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

Your Name: Jenne Walker

Facility ID Number: NCR000150284

Facility Name: East Carolina Metal Treating

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**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: **East Carolina Metal Treating, Inc.**
EPA ID Number: **NCR 000 150 284**
Type of Facility: **Large Quantity Generator (LQG)** of hazardous waste
Facility Location: 1117 Capital Blvd
Raleigh, NC 27603

2. FACILITY CONTACT INFORMATION:

James Ramm, President - ECMT
Office telephone: 919-834-2100; e-mail: james@ecmtinc.com

3. SURVEY PARTICIPANTS:

Steve Mooney, Maintenance Supervisor - ECMT
Jenne S. Walker, Environmental Senior Specialist, Hazardous Waste Section,
DWM, NCDEQ

4. DATE OF SITE VISIT: February 4, 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 and Conservation Recovery Act or RCRA regulations) which are described at 40 CFR Parts 261-262, 264, 265, 268, 270, 273 and 279 and 15A NCAC 13A.

6. FACILITY DESCRIPTION:

East Carolina Metal Treating, Inc. performs heat treating to alter the durability and strength of various metal materials to meet customers' needs. The facility uses black oxide, salt austempering and quenching processes.

General Information:

1. **Legal owner of business and property:** East Carolina Metal Treating, Inc.
2. **Land area:** ~2 acres
3. **Operating shifts:** 24 hrs/day, 7 days/week
4. **Number of employees:** ~ 30
5. **Water supply:** City of Raleigh
6. **Sanitary Sewer:** City of Raleigh
7. **Ground water monitoring wells on site:** None on-site
8. **Distance to closest off-site well:** Unknown
9. **Distance to closest private residence:** ~ ¼ mile
10. **Other:** ECMT has been issued an Industrial User Permit (IUP) by the City of Raleigh that allows for pH adjustment of wastewater prior to discharge.

7. WASTE STREAMS:

Waste streams generated onsite include:

Hazardous waste (HW):

- D001 – waste oxidizing solid (sodium nitrite, sodium nitrate)
- D002 – waste corrosive liquid, basic, inorganic (sodium hydroxide)
- D002, D007 – waste caustic alkali
- D001, F003 – waste flammable liquids, toxic (methanol)

Other waste: wastewater, used (green tipped) fluorescent lamps, used oil, salt dust, used filter bags, empty drums

8. AREAS OF REVIEW AND INSPECTION:

PAPERWORK/RECORDS REVIEW:

Contingency Plan (CP) – The facility’s LQG contingency plan (revised 7/15/2015) was reviewed and found to be satisfactory. The plan is reviewed annually and was under review at the time of the inspection. Steve Mooney is the Primary Emergency Coordinator (EC) and Jamie Ramm is the Alternate EC.

Emergency Preparedness –The facility’s contingency plan was sent to authorities in July 2015. In addition, the facility is equipped with fire extinguishers, pull alarms, fire suppression system (sprinklers) and communication equipment is available to staff at all times (cell phones, 2-way radios, facility wide intercom/paging system). All equipment is routinely tested and appeared well-maintained.

Arrangements w/local Emergency Response Authorities – Arrangements letters were sent by Certified Mail/Return Receipt to local emergency responders in July 2015.

Copies of the letters and signed green cards were on-file and available for review (sent to Raleigh Police Dept, Raleigh Fire Dept, Wake Med Hospital).

Inspection Records (hazardous waste storage areas) – The facility’s hazardous waste storage areas are inspected weekly and inspection logs were found to be complete.

Manifests/LDRs – Manifests and LDRs generated since December 2014 were reviewed and found to be complete and well organized.

- HW Transporters:** Safety Kleen Systems, Inc. – TXR 000 050 930
- HW TSDF’s:** Clean Harbors LaPorte LLC – TXD 982 290 140
- Clean Harbors Reidsville, LLC – NCD 000 648 451
- Clean Harbors Deer Park, LLC – TXD 055 141 378
- Safety Kleen Systems, Inc. – KYD 053 348 108

Biennial Report – A copy of the facility’s 2013 biennial report was on-site and available for review during the inspection. *The next biennial report is due to the Division on March 1, 2016 for Calendar Year 2015.*

Training Records – Steve Mooney attended the May 2015 DWM LQG training class in Raleigh, NC. Steve provided annual RCRA training to staff on 5/8/2015. Training records were up to date and well organized.

Job Descriptions – Job descriptions were reviewed and found to be satisfactory.

PHYSICAL INSPECTION/FACILITY WALK-THRU:

Satellite Accumulation Areas (SAAs): One SAA was observed on-site at the following location:

- **Black Oxide Line** – No hazardous waste was observed accumulating at the time of the inspection.

Less than 90-Day Hazardous Waste (HW) Storage Areas (x2): Two HW storage areas are located on-site. The following observations were made during the inspection:

- **Main Chemical & Waste Storage Area** – No containers of hazardous waste were in storage at the time of the inspection.
- **Salt Potassium Line** – One ‘1-cubic yard’ box of sodium nitrate/sodium nitrite was observed in storage. The container was closed, in good condition, properly labeled ‘hazardous waste’ and dated 1/25/16. Appropriate aisle space was maintained, and all requirements appeared to be met.

Used Oil – Three small tanks (~ 300 gallons each) of used oil were stored in the back (southwestern) corner of the facility near the loading dock door. The inspector noted that the area was exceptionally clean and good housekeeping practices appear to be followed on-site.

Universal Waste – Green tipped (low mercury) fluorescent lamps are utilized on-site. However, no used fluorescent lamps have been generated on-site to date, because the facility recently moved into a newly lamped building. Documentation is kept on-file to show that the fluorescent lamps purchased and used on-site contain lower levels of mercury than traditional fluorescent lamps.

Other Areas Inspected (Non-hazardous waste streams):

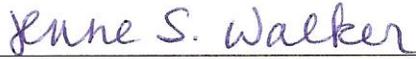
‘Induction’ – Liquid sodium nitrite is generated in the induction area and stored in a 55-gallon drum.

8. WASTE MINIMIZATION:

Good operating practices. The facility has a written waste minimization plan that is reviewed annually.

9. CONCLUSION:

No areas of concern were identified during the compliance inspection. Please contact me 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 regulations.



Jenne S. Walker

Environmental Senior Specialist, NCDEQ

Signed 3/1/16