File ID Number: HWCB2016402

DEQ/DWM/Hazardous Waste Section

NCD/NCR (other) Number: NCD980841951

Facility Name: Special Metals Welding Products Co.

Address: 1401 Burris Rd. City: Newton

County: Catawba

File Date Range: 4/17/08 - 3/29/10

#### Document Type (s)

Inspection Reports

\*NOV (See Comments)

- \* Compliance Orders/Settlement Agreement (See Comments)
  - \*(Provide NOV Type, Docket Number and Date of NOV in Comment Section)
- X Correspondence/Letters
- \_\_\_\_\_ Pictures (Tape to a full sheet of paper)
  - \_\_\_\_\_ \*\* Name Change and Date of Change
    - \*\* (Write Name Change Information in Comment Section)
- \_\_\_\_\_ Sampling Data
- \_\_\_\_\_ Other Information (See Comments)

Comments:



A Division of Huntington Alloys Corporation 1401 Burris Road Newton, NC 28658 USA Phone (828) 465-0352 Fax (828) 465-3447 http://www.specialmetalswelding.com

Dear Sir :

Please find enclosed our updated Integrated Contingency Plan dated 03/29/2010.

Page 15, section 2.1, has been edited to remove and add several Emergency Coordinators. This newest revision supersedes the June 2009 document.

Please contact me if you have any questions.

Thank you.

Hermitt Inigeral

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA <u>hlinyard@smwpc.com</u> 828-695-2755 fax 828-465-3447

Integrated Contingency Plan

### **INTEGRATED CONTINGENCY PLAN**

#### For

## SPECIAL METALS WELDING PRODUCTS CO. NEWTON, NORTH CAROLINA

Guidelines For Emergency Response and Cleanup Measures For Releases of Hazardous and Non-Hazardous Substances Into Air, Soil, Surfacewater, and Public Sewer System

> 1401 Burris Road Newton, North Carolina 28658

> > 828-465-0352

Integrated Contingency Plan

### TABLE OF CONTENTS

## **SECTION I -- PLAN INTRODUCTION ELEMENTS**

- 1. Purpose and Scope of Plan Coverage
- 2. Current Revision Data
- 3. General Facility Information

## **SECTION II -- CORE PLAN ELEMENTS**

- 1. Discovery
- 2. General Response
- 3. Specific Responses for Release Scenarios
- 4. Termination and Follow-Up Actions

## **SECTION III -- ANNEXES**

- 1. Facility and Locality Information
- 2. Notification
  - Emergency Coordinators
  - Plant Personnel
  - State and Local Agencies with Designated Response Roles
  - Local Authority for Evacuation
- 3. Incident Documentation
- 4. Training and Exercises/Drills
- 5. Response Critique and Plan Review and Modification Process
- 6. Prevention
- 7. Emergency Equipment

Integrated Contingency Plan

!

## **SECTION I -- PLAN INTRODUCTION ELEMENTS**

### Purpose and Scope of Plan Coverage

The purpose of this <u>Integrated Contingency Plan (ICP)</u> is to provide written guidelines for responding to various emergency conditions that could occur within or near the Special Metals Welding Products Plant on Burris Road, Newton, North Carolina, involving liquid or solid ingredient chemicals, flammable gases, non-flammable gases, oil, and other chemical substances.

The ICP is focused primarily on the actions to be taken by the Emergency Coordinator, but ALL plant personnel involved in chemical processing, waste handling, or any form of emergency response activity must review, rehearse and understand these guidelines.

As no emergency – by definition – follows an exact script, no two emergency responses will be the same, nor follow the same script, either. Therefore, this document presents *guidelines* for actions to be taken for fore-seeable emergencies and prepares all personnel to respond quickly and safely, report to local authorities, clean up, and get back to normal operations again as soon as possible.

The Plant does not maintain a HazMat Response Team or a Fire Brigade. Therefore, the guidelines herein focus on (1) Making sure all Company personnel are safe, (2)That the size and scope of the emergency is controlled and minimized to the extent it can be done safely, and (3) Utilizing outside resources such as the Fire Department, the Catawba County HazMat team, and/or emergency clean-up contractors as needed.

The intent of this Integrated Contingency Plan is to be broad enough in scope to address the (overlapping) contingency plan requirements of RCRA (Hazardous Waste Treatment, Storage, and Disposal), the EPA's Oil Pollution Prevention Regulations (SPCC), the OSHA (HAZWOPER) regulations, the Clean Air Act (Risk Management Plans), and the requirements of the NC-DEHNR for Stormwater Pollution Prevention and NPDES (waste-water pretreatment) standards.

Note: The ICP applies to emergencies. Spills of most dry chemicals during normal plant processing generally will <u>not</u> be emergencies. The person responsible for making a mess is also responsible for cleaning it up using normal equipment, and for following routine procedures for disposal of waste material.

1

Integrated Contingency Plan

### **Current Revision Data**

This section documents all revisions to this Plan including changes made in this section and will be maintained as a permanent part of the Contingency Plan.

Revised Section	Revision Date	Revisions
Section B	10-1-87	Adding Harold Steven Winnell
Emergency Coordinator Listing		Adding Stephen B. Schooley; Deleting James C. Judd
Section K	10-1-87	3 Revisions
Section B	4-23-96	Update Section B Emergency Coordinators
Emergency Coordinator Listing	7-25-00	Name Change
All	4-27-06	Company name change; coordinator name change; general revisions; add emergency responders.
Entire Document	May, 2008	Conversion of entire document to follow National Response Team's Integrated Contingency Plan Guidance, ref: Federal Register, June 5, 1996
Sections I & III	June, 2009	Delete Alan Jones, add Hewitt Linyard, edit drawing
Section III	March 2010	Delete Tom Dickerson and Jeannie Martin, add Shannon Lail and Willie Logan.

### **General Facility Information**

FACILITY <b>COMPANY</b> NAME:	SPECIAL METALS WELDING PRODUCTS A Subsidiary of Precision Castparts Corporation
OPERATOR:	HUNTINGTON ALLOYS A SPECIAL METALS COMPANY

A SPECIAL METALS COMPANY 3200 Riverside Drive

Integrated Contingency Plan

	Huntington, WV 25705
PHYSICAL ADDRESS:	1401 Burris Road, Newton, Catawba County North Carolina 28658
LATITUDE/LONGITUDE:	35.686581, -81.196861
SIC CODE:	3356 (Roll, Draw, & Extrude Nonferrous)
NAICS CODE: aluminum) rolling, drawing and extra	331491 (Nonferrous metal (except copper and uding)

TYPE OF BUSINESS: Manufacturing flux-coated welding electrodes and bare filler metal for welding. The manufacturing operations include blending, mixing, drying, pressing, extruding and baking various flux compositions; rolling, drawing, cleaning, and annealing stainless steel and high-nickel alloy compositions.

GENERATOR'S US EPA ID No.: NCD98084195

STORMWATER DISCHARGE PERMIT CERTIFICATE OF COVERAGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM STORMWATER GENERAL PERMIT NCG030000: NCG030314

KEY CONTACT FOR PLAN DEVELOPMENT AND MAINTENANCE:	Hewitt Linyard - QA Manager
PHONE NUMBER FOR KEY CONTACT:	828-465-0352 Ext. 255
MAIN TELEPHONE NUMBER:	828-465-0352
FAX NUMBER:	828-465-3447

Integrated Contingency Plan

## **SECTION II -- CORE PLAN ELEMENTS**

#### Discovery

Any person in the plant who observes a release or potential release – whether sudden or non-sudden – of any significant hazardous material or waste is to notify his supervisor who will in turn contact the Environmental Emergency Coordinator or one of the Alternate Environmental Emergency Coordinators.

The decision to implement the Contingency Plan depends upon whether or not an imminent or actual incident could threaten human health or the environment.

The Emergency Coordinator has the duty to make this decision. The Emergency Coordinator is authorized to commit the resources of SMWPC, including emergency purchases, as needed, in implementing the Contingency Plan in response to an accident.

Depending on the degree of seriousness, the following potential emergencies might call for implementation of the Contingency Plan. The purpose of this section is to provide <u>guidance</u> to the Emergency Coordinator by providing decision-making criteria.

## A SPILL or MATERIAL RELEASE will require activation of the Contingency Plan if:

- 1. A hazardous material is spilled in a location where it can not be immediately contained and could contaminate surface or groundwater, soil, or the atmosphere.
- 2. The spill could result in the release of flammable liquids or vapors creating a fire or explosion hazard.
- 3. The spill could result in the release of toxic vapors which endanger human health and/or the environment.

#### A FIRE will require activation of the Contingency Plan if:

- 1. The fire could cause the release of toxic fumes.
- 2. Use of water or water & chemical fire suppressant results in contaminated run-off off-site.
- 3. A fire exists and if the fire spreads, it could ignite materials at other ' locations at the site or cause heat-induced explosions.
- 4. The fire could spread to off-site areas.
- 5. Use of water or water and chemical fire suppressant could result in contaminated run-off.

Integrated Contingency Plan

#### An EXPLOSION will require activation of the Contingency Plan if:

- 1. An imminent danger exists that an explosion could occur, resulting in a safety hazard due to flying fragments or shock waves.
- 2. An imminent danger exists that an explosion could ignite other hazardous waste at the facility.
- 3. An imminent danger exists that an explosion could result in release of toxic material.
- 4. An explosion has occurred.

### General Response

#### Notification

The Emergency Coordinator will assess possible hazards to human health and/or the environment as a result of these releases, fires, and explosions and subsequently, if necessary, notify all affected or potentially affected facility personnel by public address system or by the building evacuation alarm. The nature and extent of the incident will dictate the number, type, and order in which appropriate Federal, State, or local agencies, and off-site emergency response agencies will be notified. See Section III – Annexes, State and Local Agencies with Designated Response Roles

#### **Identification of Hazardous Wastes**

The Emergency Coordinator will immediately identify the character, source, amount and extent of any released materials. The initial identification method will be to utilize visual analysis of the material, the containers, or process machinery, and the Coordinator's knowledge of the location of the release. If, for some reason, the released material cannot be identified, samples may be taken for laboratory analysis.

#### Assessment

The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment. These effects may include toxic, irritating, or asphyxiating gases that are generated, or the effects of hazardous surface water run-off from water or chemical agents used to control fire or heat-induced explosions.

#### **Procedural Guidelines**

In the event of a major emergency involving a hazardous material, the following general procedures are to be used for rapid and safe response and control of the situation.

1. If an employee discovers a leak which cannot be stopped by immediate action (turning off pumps, setting drum upright, etc.) by the employee before it becomes a significant release, he is to immediately report it to his foreman or supervisor.

Integrated Contingency Plan

- 2. The foreman or supervisor will observe the spill and contact the Emergency Coordinator, supplying him with the following information:
  - The name and position of the person reporting the emergency.
  - Identity of the materials included.
  - The approximate quantity spilled.
  - The specific location of the emergency.
  - The potential of fire and/or explosion.

This information will help the Emergency Coordinator to assess the magnitude and potential seriousness of the spill or release. If the accident is determined to lie within the Company's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary in-plant personnel. The initial response to any emergency will be to protect human health and safety, and then the environment. Identification, containment, treatment and disposal assessment will be the secondary response.

If the accident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies, starting with 911. Evacuation of all potentially affected plant areas will be initiated as soon as possible.

During the emergency, the Emergency Coordinator Must:

- Take measures to ensure that the incident does not recur or spread to other hazardous waste at the facility. Stop operations if necessary.
- Monitor equipment for leaks, pressure build-up or other potential problems in operations that are shut down.

#### **Containment and Clean-Up Guidelines**

The following procedures for containment and clean-up are guidelines to be followed in the event of a release of *hazardous material*. Additional or alternate procedures may be used if in the judgment of the coordinator the alternate procedures offer equivalent or better protection of human health and the environment. All clean-up and containment procedures are to be directed by the Emergency Coordinator or his alternate.

#### Solid Materials

- 1. Transfer any material from a leaking drum into an approved drum.
- 2. Shovel and sweep any released material into an approved drum.
- 3. Mop the floor to remove any residue present, and dispose of the mop water along with the solid waste.

#### Liquid Materials

If a drum is leaking:

- 1. Position the drum so that the hole is the highest point of the drum to stop further leaking.
- 2. Place the saturated absorbent in an approved drum.

Integrated Contingency Plan

3. Store this contained material in a safe place and contact disposal firm.

### Specific Responses for Release Scenarios

#### Natural Gas Leak – Outdoors

Key Guideline: Keep the leaking gas outside of the building, if possible, by shutting off supply air fans, and closing all doors near the point of the leak. Do not switch any electrical devices, including ordinary light switches, ON or OFF if you smell gas where the switch is located (a spark could ignite the gas).

#### Natural Gas Leak – Indoors

Immediately turn off the gas cock at the point of the leak, if it is safe to do so. Do not switch any electrical devices, including ordinary light switches, ON or OFF if you smell gas where the switch is located (a spark could ignite the gas).

If electrical power needs to be turned off, go to the circuit breaker or distribution panel for the equipment/area, and turn off the breaker(s).

If there is fire at the point of the leak, retreat to the nearest section control valve, or to the main gas safety shut off valve at Column A-3, and shut off the natural gas supply.

Call 9-1-1 to get the Fire Department on the way just in case the leaking gas ignites.

#### Cooling Water Leak – Underground

Cooling tower water is treated with microbiocide (isothiazolinones in a caustic solution) and scale inhibitor (phosphate/molybdate/tolyltriazole in sodium hydroxide solution) that are environmental concerns. Normal concentration of these chemicals in cooling water is under 100 ppm.

Turn off the cooling tower pumps as soon as possible, to minimize ground water contamination. If the estimated volume lost exceeds 1000 gallons, contact NCDENR, Division of Water Quality. See Section 9.

#### Hydrogen Tank/Line Leak

The hydrogen tank is equipped with a valve that slams shut if there is excessive flow, by sensing the flow of liquid hydrogen at cryogenic temperature, so a broken pipe should result in a very short duration leak.

If the leak is smaller and continuous, first and foremost make sure there are no sources of ignition. Do not switch any electrical devices, including ordinary light switches, ON or OFF near where the leak is located (a spark could ignite the hydrogen).

Trip the Emergency Shut-Off valve with the handle located on the fence beside the hydrogen tank.

Call 9-1-1 to get the Fire Department on the way just in case the leaking gas ignites.

Integrated Contingency Plan

#### LPG Tank or Cylinder Leak

If the leak is small and continuous, first and foremost make sure there are no sources of ignition. Do not switch any electrical devices, including ordinary light switches, ON or OFF near where the leak is located (a spark could ignite the Liquified Petroleum Gas (LPG).

If the leaking cylinder can be moved safely outdoors, do so, to reduce the fire hazard inside the building.

If the cylinder is still on the fork truck, consider the risk of igniting a fire by starting the fork truck engine versus leaving the leaking cylinder where it is found, and keep all the building exhaust fans running.

Call 9-1-1 to get the Fire Department on the way just in case the leaking gas ignites.

#### **Powdered Metal Fire**

Powdered metals may have some or all of these characteristics:

- Putting water on these metallic powders creates heat, and/or causes self-ignition.
- If the chemicals are already involved in a fire, spraying them with water may cause them to burn more intensely, i.e. the water supplies oxygen.
- If fine-mesh particles of the metallic powders become airborne, they may burn rapidly or explode.

If metallic powder chemicals are involved in a fire, use only the Class D fire extinguisher or sand to attempt to put out the fire. DO NOT USE WATER on any container marked with a:  $\mathbf{W}$ 

#### Dry Chemical Spill – General

Because of the low hazard level of most dry chemicals in the Plant, most spills of dry chemicals will not create a hazardous waste clean up situation.

#### Liquid or Dry Chemical Spill Into Sewer – "Slug Spill"

The first person to become aware of a wastewater 'slug' discharge or spill is to take the following actions:

1. In the event of a 'slug' of chemicals – whether an unusually large amount of a chemical normally discharged into the categorical sewer, or any quantity of oil or other chemical – reaching and draining into the sewer system, immediately contact the City Wastewater Treatment Plant at 695-4313, Public Works After-Hours Emergency at 465-7430 or Jim Rumley-Pretreatment Coordinator at 217-4456. Inform them of the location of discharge, time of discharge, type of material, volume and corrective actions taken.

- 2. Prevent further material from entering the sewer if possible.
- 3. Contact the Emergency Coordinator and report the following:

Integrated Contingency Plan

- a) Your name and position.
- b) The material spilled.
- c) The approximate quantity spilled.
- d) The approximate time that the spill occurred.
- e) The specific location of the spill.
- f) Actions taken to report the spill and to contain it and to clean it up.

#### Sodium silicate

Sodium silicate may be cleaned up by shovel and squeegee, and placed into normal trash dumpsters. Floors may be hosed clean with hot water.

#### **Borax pre-coat**

Borax pre-coat is a very low hazard chemical: the dry chemical may be swept up and disposed of in regular trash. When mixed with water, collect in drums or tanks and arrange for disposal with a TSDF as non-hazardous waste.

#### Barium-containing chemicals, sludge

Shovel up spills and place in 55-gallon drums, for routine disposal along with other barium-bearing waste (Baghouse Dust, Liquid Barium (from floor trench or from settling pit), and Solid Barium (from electrode press and from brushing machine baghouse)).

Spills of barium-containing material onto the ground outdoors larger than the Reportable Quantity must be reported to the EPA/NCDENR.

#### Alkaline cleaner

Spills or leaks of alkaline cleaner should be shoveled, scooped, mopped, or vacuumed up, and the collected material placed in the soap cooker outdoors. If any amount of the material is washed into the sewer system, follow the Slug Spill procedures above.

Avoid the use of dry absorbents such as Oil Dri, and use a minimal number of absorbent socks, to reduce the amount of solid waste created. Saturated absorbents may be disposed of in the plant trash dumpster.

#### Spent alkaline cleaner & soap lube

'Spent' alkaline cleaner -- alkaline cleaner that is saturated/loaded with drawing lubricant ('soap') – that has spilled indoors should be collected and placed into the soap cooker outdoors.

i

Integrated Contingency Plan

Material that has spilled outdoors must be absorbed, channeled, ponded/dammed, and collected to prevent it from entering the ditches and/or the catch basin and stormwater drainpipes that lead to the branches of McLin Creek.

#### X-ray chemistry

Not hazardous material in the quantities available on-site at Special Metals. Any collected liquid from a spill or leak may be disposed of in the soap cooker.

#### Etchants - Nitric acid, peroxide

Use proper protective gear, including safety goggles and appropriate gloves when handling any etching chemical.

Use limestone to neutralize acids; use water to dilute hydrogen peroxide

#### Glycol (from chiller)

Cover any floor drain to prevent run-off from reaching the City sewer. Collect the material in drums or tanks, and arrange for disposal.

#### **Oil Drum Punctured/Spilled/Leaking**

Roll or set the drum to stop the leak.

- a) Position the drum so that the hole is the highest point of the drum to stop further leaking.
- b) Place the saturated absorbent in an approved drum.
- c) Store this contained material in a safe place and contact disposal firm.

#### **Compressed Gas Cylinders**

Beware of compressed gas cylinders that have had the valve broken off, or that have been punctured in any way: The will instantaneously become rockets due to the sudden release of high-pressure gas.

If they are involved in a fire, they should be kept cool with a stream of water from a fire hose, to prevent overpressurization from overheating.

#### Hydraulic Oil – Pressurized Spray

Keep far away from the location of the leak, to avoid hypodermic penetration of the liquid stream into arms, hands, etc.

Hit an emergency stop button, or pull the main power switch to the hydraulic pump to shut of all electrical energy to the hydraulic pump.

Integrated Contingency Plan

### Termination and Follow-Up Actions

÷

Following the emergency, the Emergency Coordinator must:

- Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water or other material resulting from the discharge.
- Ensure that clean-up procedures are completed and emergency/clean-up equipment is again ready for use before resuming operations in affected areas. After an emergency event, and before operations are resumed, an inspection of safety equipment will be conducted.
- Complete the "Hazardous Waste Release Form" see Incident Documentation --Annex 4 of this Plan.

<u>Note on Reportable Quantity</u>: As called for in regulations developed under the Comprehensive Environmental Liability and Compensation Act of 1980 (Superfund), determine if the hazardous material released was a quantity equal to or greater than the reportable quantity as designated by the EPA or state authorities and which is listed under the Solid Waste Disposal Act, Clean Air Act, Clean Water Act, or TSCA.

• Perform the "Response Critique and Plan Review and Modification Process" procedures as directed in Annex 6 of this Plan.

Integrated Contingency Plan

## **SECTION III -- ANNEXES**

## 1. Facility and Locality Information

((maps, etc.))

۱

.

ŧ.

Integrated Contingency Plan

#### 2. Notification

#### 2.1 Emergency Coordinators

The primary Environmental Emergency Coordinator is:

Steve Winnell 3641 7<sup>th</sup> St. NE Hickory, NC 28601 (828) 324-1988

The Alternate Environmental Emergency Coordinators are:

1<sup>st</sup> Alternate

Hewitt Linyard 501 Carroll Street Statesville, NC 28677 (704) 873-4137

2<sup>nd</sup> Alternate

Shannon Lail 184 Canoe Lane Taylorsville NC 28681 (828)-612-5892

3<sup>rd</sup> Alternate

Willie Logan 1996 Union Church Road Lincolnton, NC 28092 (704) 530-6915

#### When contacting an Emergency Coordinator:

- Attempt to notify a person who is in the plant first, using the order above.
- If none of the Coordinators are in the plant, contact one of the Coordinators at their home, following the order in the above list
- The Emergency Coordinator or Alternate can deputize other Company employees to assist them in the event of an emergency.
- The Emergency Coordinator or Alternate can commit the Equipment and resources needed to deal with an emergency.

Integrated Contingency Plan

#### 2.2 Plant Personnel

(this tab section reserved for a list of all SMWPC-Newton personnel, with home addresses and telephone numbers)

;

.

.

.

.

Integrated Contingency Plan

#### 2.3 State and Local Agencies with Designated Response Roles

.

9-1-1

City of Newton Fire Marshall Mr. Dale Coffey 116 "A" Street Newton, NC 28658	828-695-4284 (cel) 828-217-2167
Catawba County Emergency Services (HAZMAT Team Mr. David Weldon - Coordinator (alt.: Ms. Shonda Hollis – Adminsitrative Asst. P.O. Box 389 Newton, NC 28658	n, LEPC) 828-465-8233 (cel) 828-302-5139 828-465-8232
<b>City of Newton Police Department</b> Mr. Donald Brown – Chief P.O. Box 550 Newton, NC 28658	828-695-4306
City of Newton Water Treatment Plant (POTW) Mr. James Rumley – Pretreatment Coordinator Alternate Numbers: Public Works After-Hours Emergency Mr. Danny Sigmon Public Works Normal Hours P.O. Box 550 Newton, NC 28658	828-695-4313 828-695-4337 (cel) 828-217-4456 7: 828-465-7430 828-695-4346 828-695-4310
Catawba Memorial Hospital Mr. Dale Greer – Safety Officer 810 Fairgrove Church Road Hickory, NC 28602	828-326-3592
<b>STAT, Inc. – Chemical emergency spill clean-up, trans</b> services and equipment supplier Mr. Gary Sparts P.O. Box 1443 Lenoir, NC 28645	portation and disposal

Integrated Contingency Plan

Mooresville, NC 28115

.

North Carolina Department of Environment and Natural Resources – HazardousWaste Section, Division of Waste ManagementMr. Stephen Barron610 East Center Avenue(cel) 919-270-2186

÷

.

NP-1 Integrated Contingency Plan - March 2010.doc Print Date: 3/29/2010 :

Integrated Contingency Plan

#### 2.4 Local Authority for Evacuation

The Incident Commander is responsible for determining if any level of evacuation is necessary.

The Chief of the City of Newton Fire Department is designated as the Incident Commander for the purposes of this plan. The acting Emergency Coordinator will serve as temporary Incident Commander until arrival of the Fire Department on scene.

1

1

Integrated Contingency Plan

.

### 3. Incident Documentation

#### Hazardous Waste Release Form

Use this form to record data and actions taken when the Contingency Plan is implemented.

Date:		Er	mergency	Coordinator:		
Notifie	d of release by:	_Name_		Position Time:		
At:			<u> </u>			
Releas	sed material(s) (sta	te quantit	ity):			
ASSE	SSMENT OF HAZA	RDS:		······································		
//OOL				Quantity:		
	Contamination of S	Sewer		Quantity:		
	Contamination of S	Soil		Quantity:		
	Other			Quantity:		
	N-UP REPORT					
<u>01</u> .						
2.	Quantity of contan	ninated m	naterial (soi	il or Water):		
3.	How was material	in (2) dis	sposed of?_	·		
4.	What equipment v	vas used	in the clea	n-up?		
5.		nt been c	cleaned, re	paired, and placed back in its j ency Plan?		

Integrated Contingency Plan

i

## 4. Training and Exercises/Drills Records

.

.

.

Integrated Contingency Plan

### 5. Response Critique and Plan Review and Modification Process

Every actual event that requires actuation of this Contingency Plan shall be followed up with a critical examination of the event and whether the Plan was or was not effective. All deficiencies in the plan shall be addressed and the Plan modified as needed and then re-issued to all involved agencies and employees.

Integrated Contingency Plan

### 6. Prevention

Following the axiom that "Prevention is the best medicine", the Plant will operate and maintain the facilities in ways that will help avoid and/or minimize the impact of chemical-based emergencies.

The practices and principles found in a separate document, the Stormwater Pollution Prevention Plan, can be applied broadly to the types of fore-seeable emergencies outlined here as well as to those that relate to stormwater pollution.

Integrated Contingency Plan

### 7. Emergency Equipment

To be prepared for chemical emergencies, an emergency equipment cart is kept in the storage rack next to the Old 6/7 take-up. This cart contains the following items:

- 1. One bung wrench.
- 2. Two 40 pound bags of absorbent.
- 3. One large blade screwdriver.
- 4. One channel-lock pliers.
- 5. One crescent wrench.
- 6. One funnel.
- 7. One paint marker.
- 8. Two pair cloth gloves.
- 9. One square-end short handle shovel.
- 10. One 18" push broom.
- 11. One paint or white wash brush.
- 12. One roll of fiber tape.
- 13. Two rubber pads.
- 14. Two pair slip-on rubber boots.
- 15. One 10 quart galvanized pail.
- 16. Two pair black rubber gloves.
- 17. Two disposable protective suits.

An Overpack drum is stored on the rear storage pad.

Supplies are to be replenished immediately upon closure of each incident.

#### Barron, Steve

From: Sent: To: Cc: Subject: Proctor, Roberta Monday, February 01, 2010 11:43 AM dwilliams@mtnenv.com Burch, Brent; Barron, Steve RE: Special Metals

Doug. I have reviewed the plan. A minimum of 5 samples is required to determine background levels of naturally occurring metals.

I will send a letter approving the plan after I receive confirmation (via e-mail) that this change is incorporated in the plan. Please make sure to let me know at least 1 week before conducting site activities. Thanks.

From: Douglas E. Wiliams [mailto:dwilliams@mtnenv.com] Sent: Thursday, January 28, 2010 1:25 PM To: Proctor, Roberta Subject: Special Metals

Hi Robin,

Per our voice mail messages, here is an electronic copy of the remedial work plan for the Special Metals facility in Newton, NC Docket # 2009-088. A hard copy is in the mail. This is kind of a large file you might not be able to open. As always please call with questions comments discussions etc.

Doug Williams Mountain Environmental Group (Mountain Environmental Services, Inc. and Mountain Geologic, LLC) 828 648-5556

#### North Carolina Department of Environment and Natural Resources Division of Waste Management Hazardous Waste Section

#### In Re: Special Metals Welding Products Company NCD 980 841 951 Docket # 2009-088

) COMPLIANCE ORDER WITH ) ADMINISTRATIVE PENALTY

#### PRELIMINARY STATEMENT

)

This Compliance Order with Administrative Penalty ("Compliance Order") is issued by the North Carolina Department of Environment and Natural Resources, Division of Waste Management under the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (the "Act"), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (the "Rules"). Based upon information received by the Division of Waste Management, the Division of Waste Management has determined that Special Metals Welding Products Company violated certain requirements of the Act and Rules as set forth in this Compliance Order.

#### STATEMENT OF FACTS AND LAW

- 1. The North Carolina Department of Environment and Natural Resources ("the Department") is required to enforce the Act and the Rules, which govern the management of hazardous waste. This authority, including the authority to assess and recover administrative penalties in accordance with N.C.G.S. 130A-22, has been delegated to the Director of the Division of Waste Management ("the Division"). The Director has issued a sub-delegation of this authority, including the authority to assess and recover administrative penalties for violations of the Act and Rules, to the Chief of the Hazardous Waste Section, Elizabeth W. Cannon.
- 2. The United States Environmental Protection Agency has authorized North Carolina to operate the State Hazardous Waste Program in accordance with the Act and the Rules, in lieu of the federal Resource Conservation and Recovery Act (RCRA) program.
- 3. Special Metals Welding Products Company is a corporation authorized to do business in North Carolina and is a person as defined in N.C.G.S. 130A-290(a)(22).
- 4. Special Metals Welding Products Company (hereinafter Special Metals) notified the Division that it was the owner and operator of a facility located at 1401 Burris Road, Newton, Catawba County, North Carolina.
- 5. Special Metals is listed with the Division as a large quantity generator of hazardous waste. A "large quantity generator" is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month. Special Metals is required to comply with all Rules applicable to large quantity generators of hazardous waste noted in 40 CFR 262 as adopted in 15A NCAC 13A .0107.

- 6. Special Metals manufactures welding rods and other welding products.
- Special Metals generates hazardous waste as defined in N.C.G.S. §130A-290(a)(8) and 15A NCAC 13A .0106. The hazardous wastes generated by Special Metals are identified by Environmental Protection Agency (EPA) Hazardous Waste number: D005.
- 8. On May 13, 2009, Sean Morris and Stephen Barron, Environmental Senior Specialist, with the Division, conducted a Comprehensive Evaluation Inspection (CEI) at Special Metals for compliance with the Rules.
- 9. Special Metals maintains 6 satellite accumulation areas at the facility. Satellite accumulation areas within the facility consisted of one 55-gallon container at each site. The Satellite accumulation area at outside Baghouse # 5 consisted of one 55-gallon container. There is one hazardous waste storage area at the facility, located at the Rear Pad area. It held five 55-gallon containers of D005 hazardous waste.
- 10. As a result of the May 13, 2009 CEI, the Division has determined that Special Metals violated the following Rules:
  - a. 40 CFR 262.34(a)(1)(i):
    - i. Pursuant to 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107(c), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB, and CC of 40 CFR part 265.
    - ii. Special Metals violated 40 CFR 262.34(a)(1)(i) in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.
  - b. 40 CFR 262.34(a)(1)(i):
    - i. Pursuant to 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107(c), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB, and CC of 40 CFR part 265.

Pursuant to 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0110(i), a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- ii. Special Metals violated 40 CFR 262.34(a)(1)(i) in that one 55-gallon satellite accumulation container of hazardous waste located outside Baghouse #5 areas was not closed.
- c. 40 CFR 262.34(a)(4):
  - i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107(c) a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the applicable requirements for owners or operators in Subparts C and D in 40 CFR Part 265, with 40 CFR 265.16, and with 40 CFR 268.7(a)(5).
    - (1) Pursuant to 40 CFR 265.16(c), adopted by reference at 15A NCAC13A .0110(b), facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Pursuant to 40 CFR 265.16(d)(1), adopted by reference at 15A NCAC13A .0110(b), the owner or operator must maintain a job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

- (3) Pursuant to 40 CFR 265.16(d)(2), adopted by reference at 15A NCAC13A .0110(b), the owner or operator must maintain a written job description for each position listed under 40 CFR 265.16 (d)(1).
- ii. Special Metals violated 40 CFR 262.34(a)(4) in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. Also employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management positions are not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.
- d. 40 CFR 262.34(a)(4):
  - i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107(c) a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the applicable requirements for owners or operators in Subparts C and D in 40 CFR Part 265, with 40 CFR 265.16, and with 40 CFR 268.7(a)(5).

- (1) Pursuant to 40 CFR 40 CFR 265.31 adopted by reference at 15A NCAC 13A .0110(c) facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- (2) Pursuant to 40 CFR 40 CFR 265.35 adopted by reference at 15A NCAC 13A .0110(c) A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.
- ii. Special Metals violated 40 CFR 262.34(a)(4) in that the hazardous waste satellite accumulation container area located outside Baghouse # 6 had spilled hazardous waste material exposed to the outside elements. The concrete pad rainwater runoff was not collected and was allowed to flow onto the soil. Also, there was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area located at the rear pad area to allow unobstructed movement of personnel or safety equipment.
- e. 40 CFR 262.34(a)(4):
  - i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference in 15A NCAC 13A .0107(c), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR part 265.

Pursuant to 40 CFR 265.54(d), adopted by reference at 15A NCAC 13A .0110(d), the contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

- ii. Special Metals violated 40 CFR 262.34(a)(4) in that the Contingency Plan has not been updated for changes in Emergency Coordinators.
- f. 40 CFR 262.34(c)(1):
  - i. Pursuant to 40 CFR 262.34(c)(1), adopted by reference in 15A NCAC 13A .0107(c) a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

- ii. Special Metals violated 40 CFR 262.34(a)(4) in that two satellite accumulation containers of hazardous waste located outside Baghouse #5 areas where not under the control of an operator.
- g. 40 CFR 262.42(a)(2):
  - i. Pursuant to 40 CFR 262.42(a)(2), adopted by reference at 15A NCAC 13A .0107(d), a generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the Division if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.
  - ii. Special Metals violated 40 CFR 262.42(a)(2) in that the signed delivery copy was missing for manifest number 1590611 and/or 1591960 and no exception report was filed. These manifest document the delivery of 15 containers of D005 hazardous waste.

#### ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$32,500.00 per day for each violation of the hazardous waste provisions of the Act, Rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty which include the degree and extent of the harm caused by the violation and the cost of rectifying the damage.

15A NCAC 13B .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After careful consideration of each factor above, penalties are assessed as follows against Special Metals, for the violations set out in this Compliance Order, as follows: for the violations set forth in paragraphs 10.a., 10.b., 10.d., and 10.f., combined \$29,250.00; for the violations set forth in paragraphs 10.c., and 10.e. combined \$29,250.00, for the violations set forth in paragraph 10.g \$12,000.00. Accordingly, a total penalty is imposed in the amount of \$70,500.00.

#### CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Special Metals is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, and payable to the Division of Waste Management. The payment should be mailed to:

Elizabeth W. Cannon, Chief Hazardous Waste Section 401 Oberlin Road, Suite 150 Raleigh, NC 27605

2. Within sixty (60) days submit the assessed cost of \$788.63 for investigative and inspection costs associated with the assessment of the civil penalty by certified check or money order, and payable to the Division of Waste Management. The payment should be mailed to:

Elizabeth W. Cannon, Chief Hazardous Waste Section 401 Oberlin Road, Suite 150 Raleigh, NC 27605

3. Within sixty (30) days sample the soil in the area of Baghouse # 6 where rain water runoff has flowed. This sampling must be coordinated with Roberta Proctor, Western Region Chemist.

#### POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Special Metals is hereby advised that, pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules constitutes a separate violation for which an additional penalty of up to \$32,500.00 per day may be imposed. If the violation continues Special Metals may also be subject to further enforcement, including injunctive action, to prohibit any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the Act and Rules.

#### NOTICE OF RIGHT TO FILE CONTESTED CASE PETITION

Special Metals has the right to file a contested case petition regarding a matter of law, material fact, requirement, or the penalty set forth in this Compliance Order as allowed by N.C.G.S. 150B-23. Any petition for a contested case hearing must be filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714, within 30 days of receipt of the Compliance Order. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to:

Mary Penny Thompson Process Agent for the N.C. Department of Environment and Natural Resources 1601 Mail Service Center Raleigh, NC 27699-1601

Additional information concerning the Office of Administrative Hearings and the appeal process may be found on the official website for the Office of Administrative Hearings, located at **www.oah.state.nc.us.** The telephone number for the Office of Administrative Hearings is (919) 733-2691.

If a petition for contested case is not timely filed with the Office of Administrative Hearings and served on the Department, the penalty amount cannot be reduced and payment of the administrative penalty becomes due within 60 days after receipt of the Compliance Order. If a contested case petition is timely filed and served, payment of the administrative penalty is due within 60 days of receipt of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment and Natural Resources shall request the Attorney General to commence a civil action in Superior Court to recover the amount of the administrative penalty.

This the \_\_\_\_\_ day of \_\_\_\_\_, 2009

By:

Elizabeth W. Cannon, Chief Hazardous Waste Section

Special Metals NCD 980 841 951 Docket # 2009-088

•

.

#### Division of Waste Management Hazardous Waste Section Penalty Summary Worksheet

Facility Name:	Special Metals Welding Products Company	
EPA Id. Number:	NCD 980 841 951	
Docket #:	2009-088	
Regulation(s) Violated:	Refer to 10.a., 10.b., 10.d., and 10.f. of the Compliance Order	
Site Information:	Hazardous waste codes: D005	
	Toxicity of waste involved: toxic	
	Distance to residences: approximately 500 yards	
	Number of people involved: 75 employees total	

#### 15A NCAC 13B .0702 - Civil Penalty Standards:

## Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

- (i) Type of violation: waste was not placed in containers in that spillage was noted on the outside of one of the containers in the Hazardous Waste Storage Area. Also, a 55-gallon satellite accumulation container of hazardous waste located outside Baghouse #5 areas was not closed. The hazardous waste satellite accumulation container area located outside Baghouse # 6 had spilled hazardous waste material exposed to the outside elements and there was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area. Two satellite accumulation containers of hazardous waste located outside Baghouse #5 areas where not under the control of an operator.
- (ii) Type of waste involved: D005 Barium solid and liquid wastes;
- (iii) Duration and gravity of the violation: the duration unknown, failure to place waste in containers, close containers, prevent waste from being released into the environment and failure to keep satellite containers in control of the operator and provide adequate isle space, increases the risk of mismanagement leading to exposure to the employees and having hazardous waste released to the environment;
- (iv) Cause: (whether resulting from a negligent, reckless or intentional act or omission): negligence;

#### (v) Potential effect on public health and the environment:

<u>Media for exposure</u>: direct contact, air, surface water, ground water and soil.

<u>Human health effects</u>: The health effects of barium depend upon the watersolubility of the compounds. Barium compounds that dissolve in water can be harmful to human health. The uptake of very large amounts of barium that are water-soluble may cause paralyses and in some cases even death. Small amounts of water-soluble barium may cause a person to experience breathing difficulties, increased blood pressures, heart rhythm changes, stomach irritation, muscle weakness, changes in nerve reflexes, swelling of brains and liver, kidney and heart damage. Barium has not shown to cause cancer with humans. There is no proof that barium can cause infertility or birth defects

Effects on the environment: Some barium compounds that are released during industrial processes dissolve easily in water and are found in lakes,

rivers, and streams. Because of their water-solubility these barium compounds can spread over great distances. When fish and other aquatic

#### **Penalty Summary Worksheet**

Facility Name:	Special Metals Welding Products Company
EPA Id. Number:	NCD 980 841 951
Docket #:	2009-088

organisms absorb the barium compounds, barium will accumulate in their bodies. Because it forms insoluble salts with other common components of the environment, such as carbonate and sulphate, barium is not mobile and poses little risk. Barium compounds that are persistent usually remain in soil surfaces, or in the sediment of water soils. Barium is found in most land soils at low levels. These levels may be higher at hazardous waste sites.

- (vi) Effectiveness of responsive measures taken by the violator: unknown
- (vii) Damage to private property: n/a
- (2) Cost of rectifying any damage: n/a
- (3) **Previous record**: n/a

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$32,500-26,000	\$26,000-19,000	\$19,000-14,000
	MODERATE	\$14,000-10,000	\$10,000-6,500	\$6,500-4,000
	MINOR	\$4,000-2,000	\$2,000-650	\$650-150

Value from Assessment Matrix +	= \$29,250.00
Multi-Day/Event	
# of weeks/events x penalty 10 weeks no inspections x \$500 +	= \$
Compliance History	
+ 10% per repeat violation	= \$
Any other notations:	

Total penalty assessed

= \$29,250.00

## Division of Waste Management Hazardous Waste Section Penalty Summary Worksheet

Facility Name:	Special Metals Welding Products Company
EPA Id. Number:	NCD 980 841 951
Docket #:	2009-088
Regulation(s) Violated:	Refer to 10.c., and 10.e. of the Compliance Order
Site Information:	Hazardous waste codes: D005
	Toxicity of waste involved: toxic
	Distance to residences: approximately 500 yards
	Number of people involved: 75 employees total

## 15A NCAC 13B .0702 - Civil Penalty Standards:

Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

- (i) Type of violation: the facility failed to have documented annual training for three employees, employee job descriptions for the employees handling hazardous waste are not documented and job <u>fitles</u> for hazardous waste management positions are not documented for three employees;
- (ii) Type of waste involved: D005 Barium solid and liquid wastes;
- (iii) Duration and gravity of the violation: the duration is unknown, failure to provide annual training for employees and employee job descriptions increases the risk of mismanagement of hazardous waste;
- (iv) Cause: (whether resulting from a negligent, reckless or intentional act or omission): negligence;

## ((v) Potential effect on public health and the environment:

Media for exposure: direct contact, air, surface water, ground water and soil.

<u>Human health effects</u>: The health effects of barium depend upon the watersolubility of the compounds. Barium compounds that dissolve in water can be harmful to human health. The uptake of very large amounts of barium that are water-soluble may cause paralyses and in some cases even death. Small amounts of water-soluble barium may cause a person to experience breathing difficulties, increased blood pressures, heart rhythm changes, stomach irritation, muscle weakness, changes in nerve reflexes, swelling of brains and liver, kidney and heart damage. Barium has not shown to cause cancer with humans. There is no proof that barium can cause infertility or birth defects

<u>Effects on the environment</u>: Some barium compounds that are released during industrial processes dissolve easily in water and are found in lakes, rivers, and streams. Because of their water-solubility these barium compounds can spread over great distances. When fish and other aquatic

#### **Penalty Summary Worksheet**

Facility Name:	Special Metals Welding Products Company
EPA Id. Number:	NCD 980 841 951
Docket #:	2009-088

organisms absorb the barium compounds, barium will accumulate in their bodies. Because it forms insoluble salts with other common components of the environment, such as carbonate and sulphate, barium is not mobile and poses little risk. Barium compounds that are persistent usually remain in soil surfaces, or in the sediment of water soils. Barium is found in most land soils at low levels. These levels may be higher at hazardous waste sites.

- (vi) Effectiveness of responsive measures taken by the violator: n/a
- (vii) Damage to private property: n/a
- (2) Cost of rectifying any damage: n/a
- (3) Previous record: n/a

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree	MAJOR	\$32,500-26,000	\$26,000-19,000	\$19,000-14,000
of Harm	MODERATE	\$14,000-10,000	\$10,000-6,500	\$6,500-4,000
	MINOR	\$4,000-2,000	\$2,000-650	\$650-150

Value from Assessment Matrix +	= \$29,250.00
Multi-Day/Event	
# of days/events x penalty +	=\$
Compliance History	
+ 10% per repeat violation	= \$29,250.00
Any other notations:	

Total penalty assessed

= \$29,250.00

#### Signature

Date

## Division of Waste Management Hazardous Waste Section Penalty Summary Worksheet

Facility Name:	Special Metals Welding Products Company
EPA Id. Number:	NCD 980 841 951
Docket #:	2009-088
Regulation(s) Violated:	Refer to 10.g. of the Compliance Order
Site Information:	Hazardous waste codes: D005
	Toxicity of waste involved: toxic
	Distance to residences: approximately 500 yards
	Number of people involved: 75 employees total

15A NCAC 13B .0702 - Civil Penalty Standards:

# Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

- (i) Type of violation: the facility failed to submit an Exception Report to the Hazardous Waste Section for hazardous waste that was shipped on manifests number 1590611 and/or 1591960;
- (ii) Type of waste involved: D005 Barium solid and liquid wastes;
- (iii) Duration and gravity of the violation: the duration unknown, failure to submit an Exception Report increases the risk of mismanagement of hazardous waste;
- (iv) Cause: (whether resulting from a negligent, reckless or intentional act or omission): negligence;

## (v) Potential effect on public health and the environment:

Media for exposure: direct contact, air, surface water, ground water and soil.

<u>Human health effects</u>: The health effects of barium depend upon the watersolubility of the compounds. Barium compounds that dissolve in water can be harmful to human health. The uptake of very large amounts of barium that are water-soluble may cause paralyses and in some cases even death. Small amounts of water-soluble barium may cause a person to experience breathing difficulties, increased blood pressures, heart rhythm changes, stomach irritation, muscle weakness, changes in nerve reflexes, swelling of brains and liver, kidney and heart damage. Barium has not shown to cause cancer with humans. There is no proof that barium can cause infertility or birth defects;

<u>Effects on the environment</u>: Some barium compounds that are released during industrial processes dissolve easily in water and are found in lakes, rivers, and streams. Because of their water-solubility these barium

#### Penalty Summary Worksheet

Facility Name:	Special Metals Welding Products Company
EPA Id. Number:	NCD 980 841 951
Docket #:	2009-088

organisms absorb the barium compounds, barium will accumulate in their bodies. Because it forms insoluble salts with other common components of the environment, such as carbonate and sulphate, barium is not mobile and poses little risk. Barium compounds that are persistent usually remain in soil surfaces, or in the sediment of water soils. Barium is found in most land soils at low levels. These levels may be higher at hazardous waste sites.

- (vi) Effectiveness of responsive measures taken by the violator: unknown
- (vii) Damage to private property: n/a
- (2) Cost of rectifying any damage: n/a
- (3) **Previous record:** n/a

ASSESSMENT MATRIX		Degree of Deviation from Requirements		
		MAJOR	MODERATE	MINOR
Nature and Degree of Harm	MAJOR	\$32,500-26,000	\$26,000-19,000	\$19,000-14,000
	MODERATE	\$14,000-10,000	\$10,000-6,500	\$6,500-4,000
	MINOR	\$4,000-2,000	\$2,000-650	\$650-150

Value from Assessment Matrix	= \$12,000.00
Multi-Day/Event # of days/events x penalty	= \$
+	-•
Compliance History + 10% per repeat violation	= \$
Any other notations:	
Any other notations:	

Total penalty assessed

= \$12,000.00

Signature

٠

٠

Date

Special Metals NCD 980 841 951 Docket # 2009-088

.

# **RE: Barium Clean Up Standard**

Proctor, Roberta

Sent: Friday, August 28, 2009 9:12 AM

To: Barron, Steve

It is 800 mg/kg. which is pretty high.

From: Barron, Steve Sent: Wednesday, August 26, 2009 10:37 AM To: Proctor, Roberta Subject: Barium Clean Up Standard

RP

I will be going up to Special Metals after lunch to watch them sample...

I bet they will have some high Barium returns.....

What would be the clean up standard for Barium??

Thanks.....S. Barron

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an

authorized state official.

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 8/28/2009





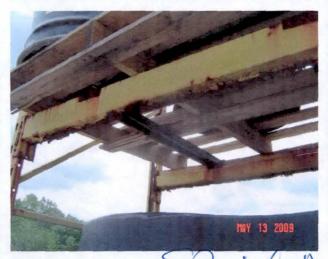










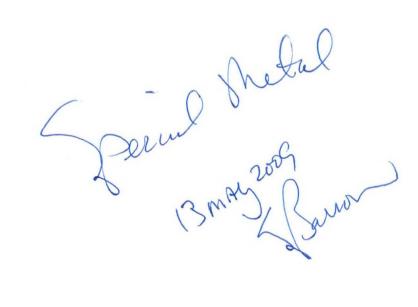


















Spein metal

26 Aug 2009

Jano

# **Compliance Order - Special Metals - Newton**

Hewitt Linyard [hlinyard@smwpc.com]

Sent: Thursday, January 14, 2010 6:23 PM

To: Barron, Steve

Steve,

We have received the Compliance Order from the NCDENR office in Raleigh, related to the audit you guys did here in May.

We believe it would be beneficial to all of us if we could have an informal meeting with your group to review and discuss the issues and related penalties as spelled out in the order. Besides myself, the attendees from Special Metals would likely be Jeff Moore, our EH&S Director from the division office, and our Plant Manager or General Manager.

We could meet the last week of this month or later. We do have an ISO auditor at the plant on 1/26, and a delegation from a Japanese customer on 2/3 - 2/4, if it's possible to avoid those dates.

We do appreciate the opportunity to go through this with the NCDENR staff. Certainly it will be enlightening, and will help to ensure future compliance on our part.

Thank you for your attention on this.

Hewitt Linyard QA Manager Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Office 828-465-0352 ext.255 Cell 828-228-4945

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com

P. T. M. D. P. P. P. P. Martines of Station (1997)

14 JAN 10 Specin Metal all - Hewill humi

ggt Cong. Older \$406

828-228-4945 Sierbook stillgaun - wants to telle in Ral.

He is to send email with Repeard.

- Amn

Dong

http://207.4.172.206/website/lcproperty2/blank.htm

## Barron, Steve

From:	Proctor, Robe
Sent:	Monday, Febr
To:	dwilliams@m
Cc:	Burch, Brent;
Subject:	RE: Special N

Proctor, Roberta Monday, February 01, 2010 11:43 AM dwilliams@mtnenv.com Burch, Brent; Barron, Steve RE: Special Metals

Doug. I have reviewed the plan. A minimum of 5 samples is required to determine background levels of naturally occurring metals.

I will send a letter approving the plan after I receive confirmation (via e-mail) that this change is incorporated in the plan. Please make sure to let me know at least 1 week before conducting site activities. Thanks.

From: Douglas E. Wiliams [mailto:dwilliams@mtnenv.com] Sent: Thursday, January 28, 2010 1:25 PM To: Proctor, Roberta Subject: Special Metals

Hi Robin,

Per our voice mail messages, here is an electronic copy of the remedial work plan for the Special Metals facility in Newton, NC Docket # 2009-088. A hard copy is in the mail. This is kind of a large file you might not be able to open. As always please call with questions comments discussions etc.

Doug Williams Mountain Environmental Group (Mountain Environmental Services, Inc. and Mountain Geologic, LLC) 828 648-5556



# North Carolina Department of Environment and Natural Resources

**Division of Waste Management** 

Beverly Eaves Perdue Governor

Dexter R. Matthews Director

Dee Freeman Secretary

January 8, 2010

#### <u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

National Registered Agents, Inc. Registered Agent for Huntington Alloys Corporation d.b.a. Special Metals Welding Products Company 120 Penmarc Dr Suite 118 Raleigh, NC 27603

#### RE: Compliance Order with Administrative Penalty Special Metals Welding Products Company NCD 980 841 951 Docket # 2009-088

Dear National Registered Agents, Inc.:

You are listed with the Secretary of State's Office as the Registered Agent for Huntington Alloys Corporation d.b.a. Special Metals Welding Products Company. Enclosed is a Compliance Order with Administrative Penalty issued to Special Metals Welding Products Company. If you have any questions, please contact Doug Roberts at (919) 508-8563.

Respectfully,

Shahill. W. Cannon

Elizabeth W. Cannon, Chief Hazardous Waste Section

Enclosure: Compliance Order with Administrative Penalty and Penalty Summary Worksheets

cc: Nancy McKee, EPA Region 4 Susan Love, Mooresville Regional Office Manager Doug Urland, WPA, Catawba County Health Director Tom Lundy, Catawba County Manager Todd Clark, Newton City Manager Don Brown, Newton City Police Chief L David Huffman, Catawba County Sheriff David Weldon, Catawba County EMS Director Kevin Yoder, Newton City Fire Chief Central Files



# North Carolina Department of Environment and Natural Resources

**Division of Waste Management** 

Beverly Eaves Perdue Governor

Dexter R. Matthews Director Dee Freeman Secretary

January 8, 2010

Hewitt Linyard Special Metals Welding Products Company 1401 Burris Road Newton, NC 28658-1754

#### RE: Compliance Order with Administrative Penalty Special Metals Welding Products Company NCD 980 841 951 Docket # 2009-088

Dear Mr. Linyard:

Enclosed is a Compliance Order with Administrative Penalty ("Compliance Order") issued to Special Metals Welding Products Company for certain violations of the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (the "Act"), and the North Carolina Hazardous Waste Management Rules, 15A NCAC Subchapter 13A (the "Rules"). The Compliance Order describes the violations at your facility.

As a result of the violations of the Act and the Rules, pursuant to N.C.G.S. 130A-22(a), an administrative penalty of \$39,300.00 is imposed in the Compliance Order. Special Metals Welding Products Company may contest this Compliance Order by filing a written petition for a contested case hearing in accordance with N.C.G.S. 150B-23(a) and 150B-23.2. See the section entitled "Notice of Rights to a Contested Case" in the attached Compliance Order. In addition, Special Metals Welding Products Company is assessed \$788.63 for investigative and inspection costs associated with the assessment of the civil penalty as noted in North Carolina General Statute 130A-22(j). These investigative and inspection costs assessments are due within 60 days of receipt of the Compliance Order and are not contestable.

Please be advised that the Department of Environment and Natural Resources has implemented a department-wide policy to release all penalties assessed against facilities to the media. Therefore, the name of your company and the penalty amount that has been assessed against the facility may be released to the media. In addition, for purposes of Articles 3A and 3J of Chapter 105 of the North Carolina General Statutes, the Division hereby notifies Special Metals Welding Products Company that it will find that the facts cited in the Compliance Order with Administrative Penalty constitute a "violation" and will report the violation to the North Carolina Department of Revenue.

If no contested case petition is filed, the administrative penalty must be paid by Special Metals Welding Products Company within 60 days of receipt of the Compliance Order by certified check or money order, payable to the Division of Waste Management, and mailed to:

> Elizabeth W. Cannon, Chief Hazardous Waste Section Division of Waste Management 401 Oberlin Road, Suite 150 Raleigh, North Carolina 27605

If you desire to schedule an informal conference to discuss the Compliance Order, please contact Doug Roberts at (919) 508-8563. (Scheduling an informal conference will not extend the time limit for filing a contested case petition.)

Respectfully,

Elijahith W. Canzon

Elizabeth W. Cannon, Chief Hazardous Waste Section

Enclosures: Compliance Order with Administrative Penalty and Penalty Summary Worksheets

cc: Nancy McKee, EPA Region 4 Susan Love, Mooresville Regional Office Manager Doug Urland, WPA, Catawba County Health Director Tom Lundy, Catawba County Manger Todd Clark, Newton City Manager Don Brown, Newton City Police Chief L David Huffman, Catawba County Sheriff David Weldon, Catawba County EMS Director Kevin Yoder, Newton City Fire Chief Central Files

## North Carolina Department of Environment and Natural Resources Division of Waste Management Hazardous Waste Section

۱.

)

## In Re: Special Metals Welding Products Company NCD 980 841 951 Docket # 2009-088

# COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY

## PRELIMINARY STATEMENT

This Compliance Order with Administrative Penalty ("Compliance Order") is issued by the North Carolina Department of Environment and Natural Resources, Division of Waste Management under the North Carolina Solid Waste Management Act, N.C.G.S. Chapter 130A, Article 9 (the "Act"), and the North Carolina Hazardous Waste Management Rules, 15A NCAC 13A (the "Rules"). Based upon information received by the Division of Waste Management, the Division of Waste Management has determined that Special Metals Welding Products Company violated certain requirements of the Act and Rules as set forth in this Compliance Order.

## STATEMENT OF FACTS AND LAW

- 1. The North Carolina Department of Environment and Natural Resources ("the Department") is required to enforce the Act and the Rules, which govern the management of hazardous waste. This authority, including the authority to assess and recover administrative penalties in accordance with N.C.G.S. 130A-22, has been delegated to the Director of the Division of Waste Management ("the Division"). The Director has issued a sub-delegation of this authority, including the authority to assess and recover administrative penalties for violations of the Act and Rules, to the Chief of the Hazardous Waste Section, Elizabeth W. Cannon.
- 2. The United States Environmental Protection Agency has authorized North Carolina to operate the State Hazardous Waste Program in accordance with the Act and the Rules, in lieu of the federal Resource Conservation and Recovery Act (RCRA) program.
- 3. Special Metals Welding Products Company is a corporation authorized to do business in North Carolina and is a person as defined in N.C.G.S. 130A-290(a)(22).
- 4. Special Metals Welding Products Company (Special Metals) notified the Division that it was the owner and operator of a facility located at 1401 Burris Road, Newton, Catawba County, North Carolina. Special Metals manufactures welding rods and other welding products.
- 5. Special Metals is listed with the Division as a large quantity generator of hazardous waste. A "large quantity generator" is a generator who generates greater than 1000 kilograms of hazardous waste in a calendar month. Special Metals is required to comply with all Rules applicable to large quantity generators of hazardous waste noted in 40 CFR 262 as adopted in 15A NCAC 13A .0107.

Special Metals NCD 980 841 951 Docket # 2009-088

1

- 6. Special Metals generates hazardous waste as defined in N.C.G.S. §130A-290(a)(8) and 15A NCAC 13A .0106. The hazardous waste generated by Special Metals is identified by Environmental Protection Agency (EPA) Hazardous Waste number D005.
- 7. On May 13, 2009, Sean Morris and Stephen Barron, Environmental Senior Specialists, with the Division, conducted a Comprehensive Evaluation Inspection (CEI) at Special Metals for compliance with the Rules.
- 8. Special Metals maintains six satellite accumulation areas at the facility. The facility has four satellite accumulation areas within the main building. There were two other satellite accumulation areas located outside the main building; one was located outside Baghouse #5 and the other located outside Baghouse #6. There is one hazardous waste storage area at the facility, located at the rear pad area.
- 9. As a result of the May 13, 2009 CEI, the Division has determined that Special Metals violated the following Rules:
  - a. 40 CFR 262.34(a)(1)(i):
    - i. Pursuant to 40 CFR 262.34(a)(1)(i), adopted by reference at 15A NCAC 13A .0107(c), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB, and CC of 40 CFR part 265.
    - ii. Special Metals violated 40 CFR 262.34(a)(1)(i) in that spillage of material identified by Special Metals employee Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the hazardous waste storage area, therefore, the waste was not placed in containers as required.
  - b. 40 CFR 262.34(a)(4):
    - i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107(c), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the applicable requirements for owners or operators in Subparts C and D in 40 CFR Part 265, with 40 CFR 265.16, and with 40 CFR 268.7(a)(5).
      - (1) Pursuant to 40 CFR 265.16(c), adopted by reference at 15A NCAC13A .0110(b), facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.
      - (2) Pursuant to 40 CFR 265.16(d)(2), adopted by reference at 15A NCAC13A .0110(b), the owner or operator must maintain a written job description for each position listed under 40 CFR 265.16 (d)(1).

V.

- Special Metals violated 40 CFR 262.34(a)(4) in that Steve Winnell and Tom Dickerson, listed as emergency coordinators since May 22, 2008, and Hewitt Linyard, a hazardous manager, did not attend the last hazardous waste management training conducted on May 27, 2008. The facility failed to provide job descriptions for Hewitt Linyard, Bobby Catoe, and Willie Logan at the time of the inspection.
- c. 40 CFR 262.34(a)(4):

1 · ·

ii.

i.

Pursuant to 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107(c), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the applicable requirements for owners or operators in Subparts C and D in 40 CFR Part 265, with 40 CFR 265.16, and with 40 CFR 268.7(a)(5).

Pursuant to 40 CFR 40 CFR 265.31 adopted by reference at 15A NCAC 13A .0110(c), facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

- ii. Special Metals violated 40 CFR 262.34(a)(4) in that the hazardous waste satellite accumulation container area located outside Baghouse #6 had spilled hazardous waste material exposed to the outside elements on a concrete pad with no roof. The rainwater runoff was not collected and was allowed to flow onto the soil causing a release of hazardous waste to the environment.
- d. 40 CFR 262.34(a)(4):
  - i. Pursuant to 40 CFR 262.34(a)(4), adopted by reference in 15A NCAC 13A .0107(c), a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR part 265.

Pursuant to 40 CFR 265.54(d), adopted by reference at 15A NCAC 13A .0110(d), the contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

- ii. Special Metals violated 40 CFR 262.34(a)(4) in that it failed to update the contingency plan when Alan Jones, an alternate emergency coordinator, left the company on September 2, 2008.
- e. 40 CFR 262.34(c)(1):
  - i. Pursuant to 40 CFR 262.34(c)(1)(i), adopted by reference at 15A NCAC 13A .0107(c), a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he complies with 40 CFR 265.171, 265.172, and 265.173(a).

Pursuant to 40 CFR 265.173(a), adopted by reference at 15A NCAC 13A .0110(i), a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- ii. Special Metals violated 40 CFR 262.34(c)(1) in that two 55-gallon satellite accumulation containers of D005 hazardous waste located outside the Baghouse #5 area and one satellite accumulation container of D005 hazardous waste located outside the Baghouse #6 area were not under the control of an operator. Also, one of the containers outside the Baghouse #5 area was not closed as required.
- f. 40 CFR 262.42(a)(2):
  - i. Pursuant to 40 CFR 262.42(a)(2), adopted by reference at 15A NCAC 13A .0107(d), a generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the Division if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.
  - ii. Special Metals violated 40 CFR 262.42(a)(2) in that it did not submit an Exception Report to the Division for hazardous waste that was shipped on a manifest dated September 11, 2008. Specifically, the final signed copies for manifests #1590611 and/or #1591960 (two manifests for one shipment) were not received at the generator's facility.
- g. 15A NCAC 13A .0110(c):
  - i. Pursuant to 15A NCAC 13A .0110(c), the owner or operator must maintain aisle space of at least 2 feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

ii. Special Metals violated 15A NCAC 13A .0110(c), in that on the day of inspection, it failed to maintain at least two feet of aisle spacing in the hazardous waste storage area located at the rear pad area. The access to the hazardous waste storage containers was blocked by a pallet of empty containers.

#### ADMINISTRATIVE PENALTY

N.C.G.S. 130A-22(a) authorizes an administrative penalty of up to \$32,500.00 per day for each violation of the hazardous waste provisions of the Act, Rules or any order issued pursuant to the hazardous waste provisions of the Act. N.C.G.S. 130A-22(d) sets forth the factors to be considered in determining the administrative penalty which include the degree and extent of the harm caused by the violation and the cost of rectifying the damage.

15A NCAC 13B .0702 sets forth specific criteria to be considered in addressing the statutory assessment factors which include the type of violation, type of waste involved, duration of the violation, cause of the violation, potential effect on public health and the environment, effectiveness of response measures taken by the violator, damage to private property and the history of non-compliance.

After careful consideration of each factor above, penalties are assessed as follows against Special Metals, for the violations set out in this Compliance Order, as follows: for the violations set forth in paragraphs 9.a., 9.c., 9.e. and 9.g. combined \$26,000.00; for the violations set forth in paragraphs 9.b., and 9.d. combined \$12,000.00, for the violations set forth in paragraph 9.f \$1,300.00. Accordingly, a total penalty is imposed in the amount of \$39,300.00.

## CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Special Metals is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by certified check or money order, and payable to the Division of Waste Management. The payment should be mailed to:

Elizabeth W. Cannon, Chief Hazardous Waste Section 401 Oberlin Road, Suite 150 Raleigh, NC 27605

2. Within sixty (60) days submit the assessed cost of \$788.63 for investigative and inspection costs associated with the assessment of the civil penalty by certified check or money order, and payable to the Division of Waste Management. The payment should be mailed to:

Elizabeth W. Cannon, Chief Hazardous Waste Section 401 Oberlin Road, Suite 150 Raleigh, NC 27605

3. Within sixty (60) days sample the soil in the area of Baghouse #6 where rainwater runoff has flowed. This sampling and any remediation must be coordinated with Roberta Proctor, Western Region Chemist. Roberta Proctor can be reached at:

Roberta Proctor Western Region Chemist P.O. Box 384 Lake Lure, NC 28746 (828) 625- 0171

4. For containers to be managed as satellite accumulation containers they must always be under the control of the operator.

#### POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Special Metals is hereby advised that, pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules constitutes a separate violation for which an additional penalty of up to \$32,500.00 per day may be imposed. If the violation continues Special Metals may also be subject to further enforcement, including injunctive action, to prohibit any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the Act and Rules.

## NOTICE OF RIGHT TO FILE CONTESTED CASE PETITION

Special Metals has the right to file a contested case petition regarding a matter of law, material fact, requirement, or the penalty set forth in this Compliance Order as allowed by N.C.G.S. 150B-23. Any petition for a contested case hearing must be filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714, along with the appropriate filing fee as set in accordance with N.C.G.S. 150B-23.2, within 30 days of receipt of the Compliance Order. A copy of the petition for a contested case hearing must also be served on the Division by sending a copy of the petition to:

Mary Penny Thompson Process Agent for the N.C. Department of Environment and Natural Resources 1601 Mail Service Center Raleigh, NC 27699-1601

Additional information concerning the Office of Administrative Hearings and the appeal process may be found on the official website for the Office of Administrative Hearings, located at **www.oah.state.nc.us.** The telephone number for the Office of Administrative Hearings is (919) 733-2691.

If a petition for contested case is not timely filed with the Office of Administrative Hearings and served on the Department, the penalty amount cannot be reduced and payment of the administrative penalty becomes due within 60 days after receipt of the Compliance Order. If a contested case petition is timely filed and served, payment of the administrative penalty is due within 60 days of receipt of a written copy of the final agency decision. If payment is not received as required, the Secretary of the Department of Environment and Natural Resources shall request the Attorney General to commence a civil action in Superior Court to recover the amount of the administrative penalty.

This the <u>8</u> day of <u>January</u>, 2010

By: Eliphith W. Connon

Elizabeth W. Cannon, Chief Hazardous Waste Section

#### Division of Waste Management Hazardous Waste Section Penalty Summary Worksheet

Facility Name: EPA Id. Number: Docket #: Regulation(s) Violated: Site Information: Special Metals Welding Products Company NCD 980 841 951 2009-088 Refer to 9.a., 9.c., 9.e. and 9.g. of the Compliance Order <u>Hazardous waste codes</u>: D005 <u>Toxicity of waste involved</u>: toxic <u>Distance to residences</u>: approximately 500 yards <u>Number of people involved</u>: 75 employees total

#### 15A NCAC 13B .0702 - Civil Penalty Standards:

Consider: (1)

Nature of the violation and degree and extent of harm, including at least the following:

- (i) Type of violation: waste was not placed in containers in that spillage was noted on the outside of one of the containers in the hazardous waste storage area. The Baghouse #6 hazardous waste satellite accumulation container area had spilled hazardous waste material exposed to the outside elements causing a release. Two satellite accumulation containers of hazardous waste located outside Baghouse #5 area were not under the control of an operator and one satellite accumulation container was not closed. Also, adequate aisle spacing was not maintained for containers of hazardous waste stored in the hazardous waste storage area.
- (ii) Type of waste involved: D005, barium solid and liquid wastes;
- (iii) Duration and gravity of the violation: the duration unknown, failure to place waste in containers, have satellite containers in control of the operator, close containers, not preventing waste from being released into the environment and failure to provide adequate aisle space, increases the risk of mismanagement of hazardous waste;
- (iv) Cause: (whether resulting from a negligent, reckless or intentional act or omission): negligence;

#### (v) Potential effect on public health and the environment:

<u>Media for exposure</u>: direct contact, air, surface water, ground water and soil. <u>Human health effects</u>: The health effects of barium depend upon the watersolubility of the compounds. Barium compounds that dissolve in water can be harmful to human health. The uptake of very large amounts of barium that are water-soluble may cause paralysis and in some cases even death. Small amounts of water-soluble barium may cause a person to experience breathing difficulties, increased blood pressure, heart rhythm changes, stomach irritation, muscle weakness, changes in nerve reflexes, swelling of brains and liver, kidney and heart damage. Barium has not shown to cause cancer with humans. There is no proof that barium can cause infertility or birth defects.

<u>Effects on the environment</u>: Some barium compounds that are released during industrial processes dissolve easily in water and are found in lakes, rivers, and streams. Because of their water-solubility these barium compounds can spread over great distances. When fish and other aquatic

## Penalty Summary Worksheet

Facility Name: EPA Id. Number: Docket #: Special Metals Welding Products Company NCD 980 841 951 2009-088

> organisms absorb the barium compounds, barium will accumulate in their bodies. Because it forms insoluble salts with other common components of the environment, such as carbonate and sulphate, barium is not mobile and poses little risk. Barium compounds that are persistent usually remain in soil surfaces, or in the sediment of water soils. Barium is found in most land soils at low levels. These levels may be higher at hazardous waste sites.

(vi) Effectiveness of responsive measures taken by the violator: unknown

- (vii) Damage to private property: n/a
- (2) Cost of rectifying any damage: n/a
- (3) **Previous record**: n/a

ASSESSMENT MATRIX		Degree of Deviation from Requirements				
MAJOR MODERATE		MINOR				
Nature and Degree	MAJOR	\$32,500-26,000	\$26,000-19,000	\$19,000-14,000		
of Harm	MODERATE	\$14,000-10,000	\$10,000-6,500	\$6,500-4,000		
	MINOR	\$4,000-2,000	\$2,000-650	\$650-150		

Value from Assessment Matrix= \$26,000.00+Multi-Day/Event= \$Multi-Day/Event= \$# of weeks/events x penalty= \$10 weeks no inspections x \$500 +Compliance History+ 10% per repeat violation= \$

Any other notations:

**Total penalty assessed** 

= \$26,000.00

aliffe W. Cannon ature

Jan. 8, 2010 Date

#### Division of Waste Management Hazardous Waste Section Penalty Summary Worksheet

Facility Name: EPA Id. Number: Docket #: Regulation(s) Violated: Site Information: Special Metals Welding Products Company NCD 980 841 951 2009-088 Refer to 9.b., and 9.d. of the Compliance Order <u>Hazardous waste codes</u>: D005 <u>Toxicity of waste involved</u>: toxic <u>Distance to residences</u>: approximately 500 yards <u>Number of people involved</u>: 75 employees total

#### 15A NCAC 13B .0702 - Civil Penalty Standards:

- Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:
  - (i) Type of violation: the facility failed to have documented annual training for three employees, employee job descriptions for the employees handling hazardous waste and hazardous waste management positions were not documented. Also, the Contingency Plan had not been updated for changes in Emergency Coordinators;
  - (ii) Type of waste involved: D005, barium solid and liquid wastes;
  - (iii) Duration and gravity of the violation: the duration is unknown, failure to provide annual training for employees and to maintain employee job descriptions increases the risk of mismanagement of hazardous waste;
  - (iv) Cause: (whether resulting from a negligent, reckless or intentional act or omission): negligence;

#### ((v) Potential effect on public health and the environment:

<u>Media for exposure</u>: direct contact, air, surface water, ground water and soil. <u>Human health effects</u>: The health effects of barium depend upon the watersolubility of the compounds. Barium compounds that dissolve in water can be harmful to human health. The uptake of very large amounts of barium that are water-soluble may cause paralysis and in some cases even death. Small amounts of water-soluble barium may cause a person to experience breathing difficulties, increased blood pressure, heart rhythm changes, stomach irritation, muscle weakness, changes in nerve reflexes, swelling of brains and liver, kidney and heart damage. Barium has not shown to cause cancer with humans. There is no proof that barium can cause infertility or birth defects.

<u>Effects on the environment</u>: Some barium compounds that are released during industrial processes dissolve easily in water and are found in lakes, rivers, and streams. Because of their water-solubility these barium compounds can spread over great distances. When fish and other aquatic

#### **Penalty Summary Worksheet**

Facility Name:	Special Metals Welding Products Company
EPA Id. Number:	NCD 980 841 951
Docket #:	2009-088

organisms absorb the barium compounds, barium will accumulate in their bodies. Because it forms insoluble salts with other common components of the environment, such as carbonate and sulphate, barium is not mobile and poses little risk. Barium compounds that are persistent usually remain in soil surfaces, or in the sediment of water soils. Barium is found in most land soils at low levels. These levels may be higher at hazardous waste sites.

- (vi) Effectiveness of responsive measures taken by the violator: n/a
- (vii) Damage to private property: n/a
- (2) Cost of rectifying any damage: n/a
- (3) Previous record: n/a

ASSESSMENT MATRIX		Degree of Deviation from Requirements				
		MAJOR MODERATE MIN				
Nature and Degree	MAJOR	\$32,500-26,000	\$26,000-19,000	\$19,000-14,000		
of Harm	MODERATE	\$14,000-10,000	\$10,000-6,500	\$6,500-4,000		
	MINOR	\$4,000-2,000	\$2,000-650	\$650-150		

Value from Assessment Matrix	= \$12,000.00	
+ Multi-Day/Event		
# of days/events x penalty	= \$	
+ Compliance History		
+ 10% per repeat violation	= \$	
Any other notations:		

**Total penalty assessed** 

= \$12,000.00

Eliahith W. Canner Signature

Special Metals NCD 980 841 951 Docket # 2009-088

4

## Division of Waste Management Hazardous Waste Section Penalty Summary Worksheet

Facility Name: EPA Id. Number: Docket #: Regulation(s) Violated: Site Information: Special Metals Welding Products Company NCD 980 841 951 2009-088 Refer to 9.f. of the Compliance Order <u>Hazardous waste codes</u>: D005 <u>Toxicity of waste involved</u>: toxic <u>Distance to residences</u>: approximately 500 yards <u>Number of people involved</u>: 75 employees total

#### 15A NCAC 13B .0702 - Civil Penalty Standards:

Consider: (1) Nature of the violation and degree and extent of harm, including at least the following:

- Type of violation: the facility failed to submit an Exception Report to the Hazardous Waste Section for hazardous waste that was shipped on manifests numbered 1590611 and/or 1591960;
- (ii) Type of waste involved: D005, barium solid and liquid wastes;
- (iii) Duration and gravity of the violation: the duration is approximately six months, failure to submit an Exception Report increases the risk of mismanagement of hazardous waste;
- (iv) Cause: (whether resulting from a negligent, reckless or intentional act or omission): negligence;

#### (v) Potential effect on public health and the environment:

<u>Media for exposure</u>: direct contact, air, surface water, ground water and soil. <u>Human health effects</u>: The health effects of barium depend upon the watersolubility of the compounds. Barium compounds that dissolve in water can be harmful to human health. The uptake of very large amounts of barium that are water-soluble may cause paralysis and in some cases even death. Small amounts of water-soluble barium may cause a person to experience breathing difficulties, increased blood pressure, heart rhythm changes, stomach irritation, muscle weakness, changes in nerve reflexes, swelling of brains and liver, kidney and heart damage. Barium has not shown to cause cancer with humans. There is no proof that barium can cause infertility or birth defects.

<u>Effects on the environment</u>: Some barium compounds that are released during industrial processes dissolve easily in water and are found in lakes, rivers, and streams. Because of their water-solubility these barium compounds can spread over great distances. When fish and other aquatic

Facility Name:	Special Metals Welding Products Company
EPA Id. Number:	NCD 980 841 951
Docket #:	2009-088

organisms absorb the barium compounds, barium will accumulate in their bodies. Because it forms insoluble salts with other common components of the environment, such as carbonate and sulphate, barium is not mobile and poses little risk. Barium compounds that are persistent usually remain in soil surfaces, or in the sediment of water soils. Barium is found in most land soils at low levels. These levels may be higher at hazardous waste sites.

- (vi) Effectiveness of responsive measures taken by the violator: unknown
- (vii) Damage to private property: n/a
- (2) Cost of rectifying any damage: n/a
- (3) Previous record: n/a

ASSESSMENT MATRIX		Degree of Deviation from Requirements				
MAJOR		MODERATE	MINOR			
Nature and Degree	MAJOR	\$32,500-26,000	\$26,000-19,000	\$19,000-14,000		
of Harm	MODERATE	\$14,000-10,000	\$10,000-6,500	\$6,500-4,000		
	MINOR	\$4,000-2,000	\$2,000-650	\$650-150		

Value from Assessment Matrix = \$1,300.00 + Multi-Day/Event # of days/events x penalty = \$ + Compliance History + 10% per repeat violation = \$

Any other notations:

Total penalty assessed

= \$1,300.00

4 W. Cannon hature

an. 8, 2010 Date

Special Metals NCD 980 841 951 Docket # 2009-088

6

Ъ

י ר

Company	Citation	Description	Matrix	Base	Multi-day	Repeat	Total
Special Metals Welding Products	a. 262.34(a)(1)(i)	failed to place waste in one storage container;	Maj/Maj	26,000			26,000
<b>Company</b> NCD 980 841 951 Docket # 2009-088	c. 262.34(a)(4) ref. 265.31	failed to prevent a release of hazardous waste;					
	e. 262.34(c)(1) ref. 265.173(a)	failed to maintain control of two satellite accumulation containers failed to close one satellite container;					
	g. 15A NCAC 13A .0110(c):	failed to maintain aisle space;					
- -	b. (3) 262.34(a)(4) ref. 265.16(c) ref. 265. 16(d)(2) d. 262.34(a)(4)	<ul> <li>failed to provide annual training for three hazardous waste personnel;</li> <li>failed to have job descriptions for hazardous waste personnel;</li> <li>failed to update contingency plan</li> </ul>	Maj/Mod	12,000			12,000
	f. 262.42(a)(2)	failed to file an exception report for manifest number 1590611 and/or 1591960	Modj/Min.	1,300			1,300

I.C. \$788.63

.

Total \$39,300.00

# FW: Compliance Order - Special Metals - Newton

Williford, Mike

Sent: Friday, January 15, 2010 8:40 AM

To: Roberts, Douglas

Cc: Cotton, Helen; Kady, Lebeed; Barron, Steve; Brent Burch [Brent.Burch@ncmail.net]

#### Doug,

Special Metals has requested to have an informal meeting. See the email below..their request was directed to Steve instead of you.

#### Thanks

Michael Williford,CHMM Compliance Branch Head Hazardous Waste Section - Division of Waste Management NC Dept. of Environment and Natural Resources Voice: 919-508-8572 Mike.Williford@ncdenr.gov \*please note new email address

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: Hewitt Linyard [hlinyard@smwpc.com] Sent: Thursday, January 14, 2010 6:23 PM To: Barron, Steve Subject: Compliance Order - Special Metals - Newton

Steve,

We have received the Compliance Order from the NCDENR office in Raleigh, related to the audit you guys did here in May.

We believe it would be beneficial to all of us if we could have an informal meeting with your group to review and discuss the issues and related penalties as spelled out in the order. Besides myself, the attendees from Special Metals would likely be Jeff Moore, our EH&S Director from the division office, and our Plant Manager or General Manager.

We could meet the last week of this month or later. We do have an ISO auditor at the plant on 1/26, and a delegation from a Japanese customer on 2/3 - 2/4, if it's possible to avoid those dates.

We do appreciate the opportunity to go through this with the NCDENR staff. Certainly it will be enlightening, and will help to ensure future compliance on our part.

Thank you for your attention on this.

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 1/15/2010

Hewitt Linyard QA Manager Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Office 828-465-0352 ext.255 Cell 828-228-4945

¥

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com

# Barron, Steve

From:	Roberts, Douglas
Sent:	Wednesday, February 03, 2010 5:25 PM
To:	Roberts, Douglas; Williford, Mike; Cannon, Elizabeth; Hewitt Linyard
Cc:	Cotton, Helen; Kady, Lebeed; Barron, Steve; Brent Burch
Subject:	RE: Informal Meeting Confirmed - Special Metals Wednesday, February 10, 2010 1:30 PM-3:00 PM. CR#1

This is to confirm this meeting: Special Metals Wednesday, February 10, 2010 1:30 PM-3:00 PM. CR#1

From: Roberts, Douglas
Sent: Friday, January 29, 2010 4:24 PM
To: Roberts, Douglas; Williford, Mike; Cannon, Elizabeth
Cc: Cotton, Helen; Kady, Lebeed; Barron, Steve; 'Brent Burch'
Subject: RE: Informal Meeting - Special Metals Wednesday, February 10, 2010 1:30 PM-3:00 PM. CR#1

#### Hey All:

So far Wednesday, February 10, 2010 1:30 p.m CR#1 works the best. Let me know if it will not work for you.

From: Roberts, Douglas
Sent: Wednesday, January 20, 2010 2:31 PM
To: Williford, Mike; Cannon, Elizabeth
Cc: Cotton, Helen; Kady, Lebeed; Barron, Steve; Brent Burch
Subject: RE: Informal Meeting - Special Metals - Newton

I spoke with Hewitt Linyard today, he said that the week of February 8-12 would work the best for them. Please let me know what days that week will work for you.

Thanks;

Doug

From: Williford, Mike
Sent: Friday, January 15, 2010 8:40 AM
To: Roberts, Douglas
Cc: Cotton, Helen; Kady, Lebeed; Barron, Steve; Brent Burch
Subject: FW: Compliance Order - Special Metals - Newton

Doug,

Special Metals has requested to have an informal meeting. See the email below..their request was directed to Steve instead of you.

Thanks

Michael Williford,CHMM Compliance Branch Head Hazardous Waste Section - Division of Waste Management NC Dept. of Environment and Natural Resources Voice: 919-508-8572 <u>Mike.Williford@ncdenr.gov</u> \*please note new email address

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: Hewitt Linyard [hlinyard@smwpc.com] Sent: Thursday, January 14, 2010 6:23 PM To: Barron, Steve Subject: Compliance Order - Special Metals - Newton

Steve,

We have received the Compliance Order from the NCDENR office in Raleigh, related to the audit you guys did here in May.

We believe it would be beneficial to all of us if we could have an informal meeting with your group to review and discuss the issues and related penalties as spelled out in the order. Besides myself, the attendees from Special Metals would likely be Jeff Moore, our EH&S Director from the division office, and our Plant Manager or General Manager.

We could meet the last week of this month or later. We do have an ISO auditor at the plant on 1/26, and a delegation from a Japanese customer on 2/3 – 2/4, if it's possible to avoid those dates.

We do appreciate the opportunity to go through this with the NCDENR staff. Certainly it will be enlightening, and will help to ensure future compliance on our part.

Thank you for your attention on this.

Hewitt Linyard QA Manager Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Office 828-465-0352 ext.255 Cell 828-228-4945

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com

Sele 10

- Jeffrey moore Sell (Frein Malad) Hewitt hing and

Helen Cotton

See Mita

na muli nato od mesa V star manuti

- Contain on ground o - Renoval today -

DENR - \$20K

32,500 50%

Get Com Sheet 16,250

Horen CGG.

\$ 32,500

**RE**: Special Metals Sampling

#### **RE: Special Metals Sampling**

Hewitt Linyard [hlinyard@smwpc.com]

Sent: Wednesday, August 26, 2009 8:34 AM

To: Barron, Steve

#### Steve,

When you get here, call me on my cell phone at 704-929-6814, since I'll likely be outside then. I'll come up to the lobby.

#### Thanks

HL

From: Barron, Steve [mailto:steve.barron@ncdenr.gov] Sent: Wednesday, August 26, 2009 8:12 AM To: Hewitt Linyard Subject: RE: Special Metals Sampling

HL

All I will need to do today is to meet with the person doing the sampling, and to watch them a little bit.

I think I will be there about 1:30 PM, thus allowing them time to get started sampling.

Have them go ahead and not wait on me ..

I think that will save some time for us all.

Thanks.....S. Barron

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

From: Hewitt Linyard [hlinyard@smwpc.com] Sent: Tuesday, August 25, 2009 4:46 PM To: Barron, Steve Subject: RE: Special Metals Sampling

Steve,

I just got back to my desk from a meeting, and had an email from the lab guy who'll be doing the soil sampling, and your email was right behind it. He says he won't be able to make it until around 1pm tomorrow. I hope that still allows you time to come.

Thanks

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 8/26/2009

## **RE:** soil sampling proposal

Hewitt Linyard [hlinyard@smwpc.com]

Sent: Thursday, August 20, 2009 9:58 AM

To: Proctor, Roberta

Cc: Burch, Brent; Barron, Steve

#### Ms. Proctor,

Pace Analytical will be doing the soil sampling here at our plant in Newton next Wednesday, 8/26. I have asked their field rep to come around 10am; if that changes I'll let you know.

Thanks

Hewitt Linyard Special Metals - Newton

From: Proctor, Roberta [mailto:roberta.proctor@ncdenr.gov]
Sent: Tuesday, August 11, 2009 8:29 AM
To: Hewitt Linyard
Cc: Burch, Brent; Barron, Steve
Subject: RE: soil sampling proposal

I have reviewed the "plan" and have the following comments that you may incorporate.

1- Please notify Steve and/or myself at least 3 working days prior to conducting the sampling to allow one of us to be present.

2- the soil samples should be collected at the surface of the soil, just under the grass layer, to the depth of the hand auger.

3- Soil collection methods, handling of the samples, containerization, analytical procedures, QA/QC etc. must comply with the procedures outlined in the HWS's "Generator Closure Guidelines"

http://www.wastenotnc.org/hwhome/guidance/pdf/Genclose%206-18-08.pdf

4- Unless you can provide documentation that is not necessary, soil analysis must include all RCRA metals.

#### Let me know if you have any questions

From: Hewitt Linyard [mailto:hlinyard@smwpc.com] Sent: Monday, August 03, 2009 2:58 PM To: Proctor, Roberta Subject: FW: soil sampling proposal

Ms. Proctor,

Please find a PowerPoint presentation attached, which will outline the proposed soil sampling plan subsequent to our telephone conversation on Thursday. If you have any questions, please give me a call.

Thank you.

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 8/20/2009

hlinyard@srgwpc.com 828-695-2755 fax 829-465-3447

From: Natalie Kulasa Sent: Monday, August 03, 2009 2:21 PM To: Hewitt Linyard Subject: soil sampling proposal

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com

# **RE:** Compliance Order from Raleigh

Burch, Brent

Sent: Wednesday, August 12, 2009 7:35 AM

To: Barron, Steve; Roberts, Douglas

I think I'm more confused now!

Brent G. Burch Westem Area Compliance Supervisor Hazardous Waste Section - Division of Waste Management NC Department of Environment & Natural Resources PO Box 1427 Andrews, NC 28901 828-321-9585 Brent.Burch@ncdenr.gov

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

From: Barron, Steve Sent: Tuesday, August 11, 2009 5:24 PM To: Roberts, Douglas Cc: Burch, Brent Subject: FW: Compliance Order from Raleigh

FY1.....SB

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

\*\*\*\*\*\*

From: Hewitt Linyard [hlinyard@smwpc.com] Sent: Tuesday, August 11, 2009 4:51 PM To: Barron, Steve Subject: RE: Compliance Order from Raleigh

Steve,

Thanks for the update.

As far as the company name, I know it may look confusing on a paper trail. Our plant is known as Special Metals Welding Products Company, a sub-division of Special Metals. The largest Special Metals plant is in Huntington, WV, and until a few years ago, it was

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 8/12/2009

### RE: Compliance Order from Raleigh

also the site of the corporate office. The company was purchased by Precision Castparts Corporation (PCC) in 2006, their headquarters being in Portland, OR. The SMC division office is now in a suburb of Cleveland, OH, so you can send identical correspondences to these addresses :

Special Metals Welding Products Company 1401 Burris Road Newton, NC 28658

Special Metals Corporation 25201 Chagrin Boulevard Suite 250 Beachwood, OH 44122

I assume the official SMC company name is Huntington Alloys, since that's what's on our W-2 forms. They may have chosen that name during the Chapter 11 reorganization seven years ago.

Hewitt Linyard

From: Barron, Steve [mailto:steve.barron@ncdenr.gov] Sent: Tuesday, August 11, 2009 3:17 PM To: Hewitt Linyard Subject: Compliance Order from Raleigh

HL

The folks in Raleigh are working on getting the Compliance Order out to you. We had a meeting today on it. So maybe they are getting close to sending it out.

When we look in the NC Secretary of State listing for Special Metals, we can not find it. But under the county GIS, it shows Huntington Alloys as owning the property.

Also, the EPA listing for your ID number has Huntington Alloys as the owner.

So they will be sending the Order to both addresses..

Is that correct?

Also, I will be sending out my Facility Report to you in the next few days. It is just the official document that will include all that we have been talking about. I have been holding it back until Raleigh finished their write up, so they both would match, and I would not have to do a re-write.

Attached will be an electronic copy of it. I will mail the hard copy soon.

Thanks.....S. Barron

Huntington Alloys Corporation National Registered Agents, Inc. 120 Penmarc Dr. Suite 118 Raleigh, NC 27603

Special Metals Welding Products Company 1401 Burris Road, Newton, NC 28658

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 8/12/2009

### **RE:** Compliance Order from Raleigh

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com

Conf. Call 11 Ay OS 1 pm - Derical nicht Order Reuten - Double Check Register Ogent

· .

**\*** .

## **Compliance Order from Raleigh**

Barron, Steve

 Sent:
 Tuesday, August 11, 2009 3:16 PM

 To:
 Hewitt Linyard [hilnyard@smwpc.com]

 Attachments:
 SpecialMetaWelding7AUG09F~1.doc (987 KB)

ĦL

The folks in Raleigh are working on getting the Compliance Order out to you. We had a meeting today on it. So maybe they are getting close to sending it out.

When we look in the NC Secretary of State listing for Special Metals, we can not find it. But under the county GIS, it shows Huntington Alloys as owning the property.

Also, the EPA listing for your ID number has Huntington Alloys as the owner.

So they will be sending the Order to both addresses ..

Is that correct?

Also, I will be sending out my Facility Report to you in the next few days. It is just the official document that will include all that we have been talking about. I have been holding it back until Raleigh finished their write up, so they both would match, and I would not have to do a re-write.

Attached will be an electronic copy of it. I will mail the hard copy soon.

Thanks.....S. Barron

Huntington Alloys Corporation National Registered Agents, Inc. 120 Penmarc Dr. Suite 118 Raleigh, NC 27603

Special Metals Welding Products Company 1401 Burris Road, Newton, NC 28658

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

# **RCRA Site Detail**

Report run on: August 11, 2009 - 3:12 PM

NCD980841951		METALS	S WE	LDING PR		i			
EPA Region:04 Ex	tract Flag: Y	Facility Ide	ntifier:	County: C/	ATAWBA				
Universes		erator: rating TSDF:	LQG 	Transpor IC In Pla		Active: El Indicator (H	Y E/GW): N/N		
Activity Location: NC	Source Type:	Notification	:	Seq. Number:	3	Receive Date: 3	1 MAR 2008		
ther/Previous Site Nam	e: SPECIAL META	LS WELDING	PROD	UCTS					
	RIS ROAD , NC 28658				Mailing Address:	1401 BURRIS RO NEWTON, NC 28 UNITED STATES	658		
or Source	ALAN E. JONES 828-465-0352 ext. AJONES@SMWP		NEW	BURRIS ROAD TON, NC 28658 ED STATES					
<b>Owner (current)</b> HUNTINGTON ALLOYS From: 11/26/2003 To	):		HUNT	RIVERSIDE DR FINGTON, WV 2 TINGTON			Type: Priva Phone:	ate	
Operator (current) SPECIAL METALS WEL From: 11/26/2003 To				BURRIS ROAD TON, NC 28658- TON			Type: Priva Phone:	ite	
atitude/Longitude Meas Coordinates: ,	ure - Owner:	Seq #:							
and Type: Private		Notifier: N	D			ility: Unknown		Tsd Date:	
ccessibility: IAICS Codes: 33140		mployees:		State L nd Aluminum) Ro	District:				
lazardous Waste Gener Other Hazardous Waste		5	[	enerator; State: Used Oli Activi		TATE REGULATE	) 		
Importer Activity: Mixed Waste Genera	<b>4</b> - <b>7</b>	No		Used Oil Trans	sporter Activit	y Off-Sp	ecification Used C	Dil Burner:	N
Fransporter Activity:		N		Transporte Transfer F		No Used C No	)it Fuel Marketer /	Activity	
SD Activity:		No	)	Used Oil Proce	essor and/or	Marketer who directs shipment off-specification used oil to			
lecycler Activity:		N	<u> </u>	Re-refiner Acti			specification used		N
Exempt Boiler and/or Ind Small Quantity Onsite	Burner Exemption	1: No	)	Processor. Refiner:	:		rketer who first cla meets the specific		N
Smelting, melting, Re Exemption:	mning rumace	No		Underground Injection Control	1:		nation Facility for rsal Waste:		N
Description of Hazardous EPA Waste Codes: D00	• •	ed on Site Ide	ntificatio	on Form)					
Activity Location: NC	Source Type:	Biennial Re	port \$	Seq. Number:	8	Receive Date: 2	8 MAR 2008	Report Cycle:	2007
Xher/Previous Site Nam	e: SPECIAL META	LS WELDING	PROD	UCTS			······		
	RIS ROAD , NC 28658-1754				Mailing Address:	1401 BURRIS RO NEWTON, NC 28 UNITED STATES	658-1754		
or Source	ALAN E. JONES (828) 465-0352 ex AJONES@SMWP		UNIT	ED STATES					
Wher (current) UNTINGTON ALLOYS rom: 11/26/2003 To	):		HUNT	RIVERSIDE DR FINGTON, WV 2 TINGTON			Type: Priva Phone:	ite	
Operator (current) SPECIAL METALS WEL From: 11/26/2003 To							Type: Priva Phone:	ite	

From: 11/26/2003 To:

Page 3

North Carolina Secretary of State

#### CORPORATIONS

**Corporations Home** Search By Corporate Name Search For New & Dissolved Search By Registered Agent Important Notice Resale of Tickets Online Corporations FAQ Homeowners' Association FAQ Tobacco Manufacturers Unincorporated Non-Profits **Dissolution Reports** Non-Profit Reports Verify Certification **Online Annual Reports** 

#### LINKS & LEGISLATION

**KBBE B2B Annual Reports** SOSID Number Correction 2001 Bill Summaries 1999 Senate Bills Annual Reports 1997 Corporations 1997 Professional Corporations NCSOS Authority to Dissolve Register for E-Procurement Dept. of Revenue

#### ONLINE ORDERS

Start An Order New Payment Procedures

CONTACT US

**Corporations** Division

#### TOOLS

Secretary of State Home Secretary of State Site Map Printable Page

#### North Carolina

Elaine F. Marshall Secretary

SECRETARY OF STATE

DEPARTMENT OF THE

PO Box 29622 Raleigh, NC 27626-0622 (919)807-2000

#### Date: 8/11/2009

#### Click here to:

View Document Filings | Sign Up for E-Notifications | Print apre-populated Annual Report Form | Annual Report Count | File an Annual Report |

#### **Corporation Names**

**Business Corporation Information** 

SOSID:	0073365
Status:	Current-Active
Date Formed:	6/27/1984
Citizenship:	Foreign
State of Inc.:	DE
Duration:	Perpetual

#### **Registered Agent**

Agent Name:	National Registered Agents, Inc.
Registered Office Address:	120 Penmarc Dr Suite 118 Raleigh NC 27603
Registered Mailing Address:	120 Penmarc Dr Suite 118 Raleigh NC 27603
Principal Office Address:	3200 Riverside Dr Huntington WV 25705-1737
Principal Mailing Address:	3200 Riverside Dr Huntington WV 25705-1771
Stock	

Class	Shares	No Par Value	Par Value	
99 SEE CERT	0		0	

RE: Special Metals Welding Products Draft Order

### **RE: Special Metals Welding Products Draft Order**

Burch, Brent

Sent: Friday, August 07, 2009 8:42 AM

To: Roberts, Douglas

Cc: Williford, Mike; Barron, Steve

#### Hey Doug,

Steve and I went over this earlier today and had a few changes.

#9 - Baghouse #5 had two 55-gallon containers not one.

#10. c.i. (2) - 265.16.(d)(1) should not be included in the order. They have job titles and name of persons in the job, but not descriptions.

Penalty Worksheet #1 - last sentence under type of violation should be "were" not where.

Penalty Worksheet #2 - includes 265.16(d)(1) which should not be cited.

That was it. Looks good ..... Brent.

Brent G. Burch Western Area Compliance Supervisor Hazardous Waste Section - Division of Waste Management NC Department of Environment & Natural Resources PO Box 1427 Andrews, NC 28901 828-321-9585 Brent.Burch@ncdenr.gov

\*\*\*\*\*\*\*\*\*\*\*\*

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

From: Roberts, Douglas Sent: Friday, July 31, 2009 3:00 PM To: Burch, Brent; Barron, Steve; Williford, Mike Subject: RE: Special Metals Welding Products Draft Order

Attached is the draft Order for Special Metals Welding Products. Please review and provide comments (if any) by 8/11/09

Thanks; Doug

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 8/7/2009



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue Governor Division of Waste Management Dexter R. Matthews Director

Dee Freeman Secretary

## **HAZARDOUS WASTE SECTION**

## FACILITY INSPECTION REPORT

May 28, 2009

- 1. <u>Facility Information</u>: Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 NCD 980 841 951, Large Quaptity Generator
- 2. Facility Contact: Hewitt Linyard
- 3. <u>Survey Participants</u>: Hewitt Linyard, Bobby Catoe, Sean Morris, Stephen Barron
- 4. Date of Inspection: May 13, 2009
- 5. Purpose of Inspection: To determine compliance with 40 CFR 260-279
- 6. Facility Description:
  - The facility manufactures welding rods and products.
  - There are approximately 75 employees at this facility.
  - The nearest private residence is approximately 500 yards from the facility.
  - The facility is on city water and sewer. They have a NPDES permit.
  - The facility consists of one manufacturing building.
  - The facility was last inspected on 16APRIL08, and received a Ticket Notice of Violation Docket # 2008-079. The prior inspection on 12APRIL06, also resulted in a Notice of Violation being issued.
  - The facility personnel agreed that the facility was to be inspected as a Large Quantity Generator.
  - Average hazardous waste generation for the last month of May 13, 2009 was about 7,251 lbs.

	Special Metals Waste Generations Calcula	tions			<u>}</u>							
			-									
				· · · · · · · · · · · · · · · · · · ·	·[							
	Waste shipments D005 Barlum Drummed Hazar	dous Waste										
4/7/2009	Shipped	12 Drums	8,585 lbs.	or 715 # / Drum	· · · ·							
5/13/2009	In Inventory During RCRA Inspction		+		†							
	<90 Storage area	5 Drums	3,575 lbs.	@715#/Drum								
	Plus Beghouse Drums	3 Drums	1074 bs.	@ est. 1/2 full or 358#/Drum	<u> </u>							
	Plus on the ground at the Baghouse		2 lbs.	estimate	I							
	Plus 6 Satellitte Accumulation Drums		100 lbs.	estimate								
	In Facility											
	Plus Waste D005 in Sludge Pil		2,500 lbs.									
				ennual waste generated amount.								
				(Pit is full with one year's waste)	l							
	7,251 lbs; average monthly generation for month ending May 13, 2009											

7. <u>Waste Type</u>:

- The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste annually. The facility generates about 5 drums per month of Barium waste or about 3,575 lbs. of drummed waste per month, plus baghouse generation. Annual shipment of sludge from the water treatment pit generates about 2,500 lbs. per month.
- They ship in 55 gal drum containers and occasional metal roll off containers.

## 8. Areas of Inspection:

- <u>Manifests</u>
  - Manifests where inspected. The facility had difficulty supplying all manifests. Manifest management was not adequate.
    - Signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste. Facility personnel could not explain why there were two manifest documents for the same shipment.
    - Land Disposal Restrictions included.
    - The manifests inspected were completed correctly.
    - Drummed hazardous waste shipments are made approximately every three month. Metal roll offs are shipped annually.
  - o Transporter: Envirite of Ohio OHD 980 568 992
  - TSD: Envirite of Ohio OHD 980 568 992

- Weekly Inspections
  - o Weekly inspections documents were reviewed.
  - o Inspections are being performed and documented correctly.
- <u>Training</u>
  - Not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and both do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. Both Steve Winnell and Tom Dickerson have been in the position of environmental emergency coordinators at least since May 22, 2008 through the present.
  - Employee job descriptions for the employees handling hazardous waste are not documented and could not be provided by Hewitt Linyard. Job descriptions for hazardous waste management is not documented for Hewitt Linyard (signed hazardous waste manifest 1990976), Bobby Catoe (signed hazardous waste manifest 1993147), and Willie Logan (signed hazardous waste manifest 1992740).
  - Hazardous waste annual training of other employees is taking place. Last training date was 27MAY08.
- Emergency Preparedness
  - The facility has system for notification of employees in the case of a fire or emergency.
  - o Emergency equipment is mapped and maintained.
  - o There has not been a major emergency at this facility.
  - The facility has only limited internal emergency response capabilities, and relies heavily on outside emergency response agencies.
  - o ADT completes monthly fire sprinkler inspections.
  - o Fire extinguishers are checked monthly.
  - o Key employees carry radios and/or cell phones.
- <u>Contingency Plan</u>
  - The facility had completed and documented arrangements with local emergency authorities to include Fire Marshall, Catawba County Emergency Services, Newton Police, Newton POTW, Catawba Memorial Hospital, and STAT Inc.
  - o Their Contingency Plan was located on site.
  - Emergency coordinator information was listed but was not correct. Alan Jones is still listed as an Alternate Environmental Emergency Coordinator. He has not been employed at the facility since

September, 2008. Updated Contingency Plan has not been submitted to local emergency authorities.

- All emergency equipment is indicated in the plan.
- o Evacuation routes were included.
- Biennial Report
  - o The facility's last Biennial Report was submitted on 28MAR08
- Waste Minimization Plan
  - o The Waste Minimization plan was located on site.
- Accumulation Areas
  - o There were 6 satellite accumulation areas at the facility.
  - Satellite accumulation areas within the facility consisted of one 55 gal. container. These containers were labeled correctly and were closed.
  - Satellite accumulation area at outside baghouse # 6.
    - Consisted of one 55 gal. container.
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste was observed outside of the container and on the baghouse pad.
    - The baghouse, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.
  - o Satellite accumulation area at outside baghouse #5.
    - Consisted of 55 gal. container
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste.
    - The baghouse collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. These containers of hazardous waste where not under the control of an operator. Baghouses are located outside of the facility, and are not frequently visited by employees.
    - One container of hazardous waste at baghouse #5 was not closed. The lid was not properly connected on the drum, exposing a two inch gap.
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - o It held 5 containers of D005 hazardous waste.
  - The containers were properly labeled and dated.

- There was not adequate aisle spacing of containers of hazardous waste to allow unobstructed movement of personnel or safety equipment. All waste containers, five 55 gal. containers, were blocked by a pallet of empty drums.
- Spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers.
- o The hazardous waste personnel have radios and/or cell phones.
- There is also one 8' x 10' x 8' deep in-ground FLUX PIT located on the west side of the building the collects water from the manufacturing machines. It is a self-supporting tank. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. Removal is scheduled to be completed this month. It was last removed on 4/11/08. Removed was 30,000 lbs. of D005 sludge waste.
- <u>Universal\_Waste/Used Oil</u>
  - The facility utilizes GE green fluorescent tube lamps which MSDSs indicated are non-hazardous.
  - The facility stores Used Oil on the Rear Pad. Storage is in 55 gal. containers. Used Oil is recycled. No containers where present during the inspection.
- <u>Subpart BB/CC/J</u>
  - o None at this facility

## 9. Site Deficiencies & Required Actions:

1) Waste into Containers. 40 CFR 262.34 (a) (1) (i) states that:

Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB and CC of 40 CFR part 265.

Special Metals is in violation of this regulation in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.

Special Metals must place all hazardous waste into containers

2) Management of Containers. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a) states that:

A container of hazardous waste must always be closed, except when it is necessary to add or remove waste.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained a 55 gal. container of hazardous waste that was not closed.

Special Metals must keep all containers of hazardous waste closed except when it is necessary to add or remove waste.

3) Personnel training. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.16 (c) states that:

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section . (c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Special Metals is in violation of this regulation in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training.

Special Metals must have all hazardous waste management personnel take part in an annual review of hazardous waste training.

4) **Personnel Job Descriptions.** 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.16 (d) (2) states that:

The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining

unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

Special Metals is in violation of this regulation in that employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.

Special Metals must documented employee job descriptions for the employees handling hazardous waste.

5) Maintenance and operation of facility. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.31 states that:

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Special Metals must prevent the release of hazardous waste into the environment.

6) Aisle Space. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.35 and 15A NCAC 13A .0110 (c), states that:

A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

Special Metals is in violation of this regulation in that here was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area to allow unobstructed movement of personnel or safety equipment.

Special Metals must maintain adequate aisle spacing of waste containers in the Hazardous Waste Storage Area.

7) Amendment to Contingency Plan. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.54 (d) states that:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

Special Metals is in violation of this regulation in that the Contingency Plan has not been updated for changes in Emergency Coordinators.

Special Metals must update the Contingency Plan with correct Emergency Coordinators and submit to all local emergency authorities.

### 8) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1) states that:

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust.

These containers of hazardous waste where not under the control of an operator.

Satellite Accumulation Areas must be under the direct control of an operator.

### 9) Manifest Exception reporting. 40 CFR 262.42(a)(2) states that:

A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts

Special Metals is in violation of this regulation in that the signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste manifest.

Special Metals must obtain signed delivery copy for hazardous waste manifest number 1590611 and/or 1591960, and explain why there are two manifests for the same shipment of waste.

### 10. Comments/Recommendations:

.

- Digital photos were taken during the inspection.
- The management of all RCRA required documents should be improved as discussed during the inspection.
- The facility should up date the RCRA facility information utilizing EPA form 8700-12 to indicate correct contact person.

11. Photos:



PHOTO #1 Special Metals -Rear Pad Hazardous Waste Storage Area -No adequate aisle spacing



PHOTO #2 Special Metals -Rear Pad Hazardous Waste Storage Area -Hazardous waste, D005, not in containers



## PHOTO #3 Special Metals

-Baghouse #6 Satellite Accumulation Area

-D005 Barium Hazardous Waste outside of container

-Failure to maintain facility to minimize the possibility of an unplanned release of hazardous waste to soil and surface water.



**РНОТО #4** 



РНОТО #5

Special Metals

-Baghouse #5 Satellite Accumulation Area

-Area not under the direct control of an operator.

-Container not closed.



РНОТО #6

Stephen H. BarronDateEnvironmental Senior Specialist

٠

•

cc: Facility MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files

VWAte in Continues + Cloned Viela I Annal thin J JDG Discycolm) S Relever with menning - V Ante Smi ~ Contin up dated -VSut and and I nunfeit Synorf

# **RE: Special Metals - Newton**

Hewitt Linyard [hlinyard@smwpc.com]

Sent: Wednesday, July 29, 2009 5:23 PM

To: Barron, Steve

,

Sure, Steve, I did receive this yesterday; I was waiting to review this with the plant management before proceeding. They are in New York for a few days for a quarterly review meeting. I'll get back to you soon. Thanks for the offer of assistance. Hewitt Linyard ----Original Message-----From: Barron, Steve [mailto:steve.barron@ncdenr.gov] Sent: Wednesday, July 29, 2009 4:12 PM To: Hewitt Linyard Subject: FW: Special Metals - Newton HL Would you confirm that you received this email...... and let me know if I can do anything to help... Thanks.....S. Barron Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115 PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV \*\*\*\*\* NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official. \* \*\*\*\*\* From: Barron, Steve Sent: Monday, July 27, 2009 4:14 PM To: Hewitt Linyard Cc: Burch, Brent; Proctor, Roberta

Subject: RE: Special Metals - Newton

HL

Raleigh has started to work on your Compliance Order from the violations found during the May 13, 2009 inspection.

Thanks for your earlier response. Please keep all of your information together. There will be a time later to present it again. Your working on it quickly will help in how it is viewed during the Order discussion.

One item that has already surfaced is the potential for contaminated soils around the baghouse #6 spillage.

Before the Order can be settled, there will have to be some documentation to show if the nearby soils are clean or contaminated. If contaminated, there will have to be a remediation plan executed. All of this work will have to be completed and documented before the Order can be finished. Therefore is would be best to go ahead and start the work on this.

Here is what needs to be done:
1- You need to contact Robin Proctor NCDENR Chemist to design a sampling plan for the area.
2- You will need to work with her to complete the required sampling, providing her with the results.
3- If the soils are not contaminated, then work with her to provide documentation stating such.
4-If contaminated, then work with her to develop a remediation plan and clean up standards. Execute. Once Executed, there will be the need for confirmation sampling to document that the clean up was effective.
5-Pull all this documentation together, to present to NCDENR for the Compliance Order settlement.

Roberta Proctor (Robin) Environmental Chemist Hazardous Waste Section phone/ fax 828-625-0171

Thanks.....S. Barron

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 7/29/2009

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

From: Hewitt Linyard [hlinyard@smwpc.com] Sent: Friday, June 12, 2009 5:20 PM To: Steve Barron Cc: Sean.Morris@ncmail.net Subject: RE: Special Metals - Newton

Gentlemen :

I regret that this response has taken longer than planned. I mentioned earlier that many of our staff and a number of our production personnel have been out on mandatory vacation or layoff, which has delayed some of the follow-up action items related to your audit on May 13th.

1. Training - One of our Team Leaders has completed an online RCRA training course, and now has subsequently trained most of the required personnel here for our annual required RCRA instruction. This will be completed for all by mid-week.

2. Job descriptions - We have updated the job descriptions for me as QA Manager, Willie Logan our Production Manager, and Bobby Catoe our Process Engineer, to include the responsibilities related to hazardous waste management.

3. Contingency Plan - this has been updated.

4. The April hazardous waste manifest - in an earlier email I supplied a copy of this document with the signature from the recipient vendor.

5. Aisle space around hazardous waste barrels, pallets - We have dismantled the rack we were using for this, and now store these at ground level. The barrels are of course covered, and we inspect the area weekly for accessibility.

6. Flux dust on drum exteriors - All drums have been cleaned, with the cleaning rags being placed inside one of the drums. Drum handlers have been instructed on maintaining them in a clean condition. Other preventive measures have been taken at the collection sites.

7. Collection sites - flux dust has been cleaned from the concrete pad under the drums. Catchment tubs have been placed under the drums to collect any spillage that might occur.

8. Satellite accumulation areas - A) Outside the extrusion press line and B) the bag house - Maintenance has worked on the drum-filling apparatuses, ensuring a tight fit on the drum lids. Also, these have now been designated as storage areas, rather than satellite accumulation areas, to allow more than 55 gal. at one time. The 90-day window now begins when an empty drum is positioned there, rather than when it has been filled and removed.

We have improved our document storage in the three-ring binders to provide easily-accessible information, and will continue to enhance our organization in this area.

I did note that we needed to update our EPA form 8700-12, as it had Alan Jones' name as the contact person here. I have searched Alan's electronic files to edit the document, but couldn't find it, so I have downloaded the form & instruction booklet from the EPA web site. I'll re-file the first of the week.

I wasn't sure about the proper response & documentation method here - I have many photographs to demonstrate a number of the actions taken above, and can also provide paperwork to support other changes that have been made. I didn't recall whether or not you intended a follow-up visit. Just let me know how we should proceed. Thank you.

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA hlinyard@smwpc.com 828-695-2755 fax 828-465-3447

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, <u>www.specialmetals.com</u>

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, <u>www.specialmetals.com</u>

#### RE: Special Metals - Newton

F/w 200 09

**RE: Special Metals - Newton** Barron, Steve

Sent: Monday, July 27, 2009 4:14 PM To: Hewitt Linyard [hlinyard@smwpc.com]

Cc: Burch, Brent [brent.burch@ncdenr.gov]; Proctor, Roberta [roberta.proctor@ncdenr.gov] Categories: Red Category

HL

Raleigh has started to work on your Compliance Order from the violations found during the May 13, 2009 inspection.

Thanks for your earlier response. Please keep all of your information together. There will be a time later to present it again. Your working on it quickly will help in how it is viewed during the Order discussion.

One item that has already surfaced is the potential for contaminated soils around the baghouse #6 spillage.

Before the Order can be settled, there will have to be some documentation to show if the nearby soils are clean or contaminated. If contaminated, there will have to be a remediation plan executed. All of this work will have to be completed and documented before the Order can be finished. Therefore is would be best to go ahead and start the work on this.

Here is what needs to be done:

1- You need to contact Robin Proctor NCDENR Chemist to design a sampling plan for the area.
2- You will need to work with her to complete the required sampling, providing her with the results.
3- If the soils are not contaminated, then work with her to provide documentation stating such.
4-If contaminated, then work with her to develop a remediation plan and clean up standards. Execute. Once Executed, there will be the need for confirmation sampling to document that the clean up was effective.
5-Pull all this documentation together, to present to NCDENR for the Compliance Order settlement.

Roberta Proctor (Robin) Environmental Chemist Hazardous Waste Section phone/ fax 828-625-0171

Thanks.....S. Barron

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

\*\*\*\*\*

From: Hewitt Linyard [hlinyard@smwpc.com] Sent: Friday, June 12, 2009 5:20 PM To: Steve Barron Cc: Sean.Morris@ncmail.net Subject: RE: Special Metals - Newton

Gentlemen :

I regret that this response has taken longer than planned. I mentioned earlier that many of our staff and a number of our production personnel have been out on mandatory vacation or layoff, which has delayed some of the follow-up action items related to your audit on May 13th.

1. Training - One of our Team Leaders has completed an online RCRA training course, and now has subsequently trained most of the required personnel here for our annual required RCRA instruction. This will be completed for all by mid-week.

2. Job descriptions - We have updated the job descriptions for me as QA Manager, Willie Logan our Production Manager, and Bobby Catoe our Process Engineer, to include the responsibilities related to hazardous waste management.

3. Contingency Plan - this has been updated.

4. The April hazardous waste manifest - in an earlier email I supplied a copy of this document with the signature from the recipient vendor.

5. Aisle space around hazardous waste barrels, pallets - We have dismantled the rack we were using for this, and now store these at ground level. The barrels are of course covered, and we inspect the area weekly for accessibility.

6. Flux dust on drum exteriors - All drums have been cleaned, with the

https://mail.nc.gov/owa/?ae=Item&t=IPM.Note&id=RgAAAABO40%2bblbGZTLga%2fZ... 7/27/2009

cleaning rags being placed inside one of the drums. Drum handlers have been instructed on maintaining them in a clean condition. Other preventive measures have been taken at the collection sites.

7. Collection sites - flux dust has been cleaned from the concrete pad under the drums. Catchment tubs have been placed under the drums to collect any spillage that might occur.

8. Satellite accumulation areas - A) Outside the extrusion press line and B) the bag house - Maintenance has worked on the drum-filling apparatuses, ensuring a tight fit on the drum lids. Also, these have now been designated as storage areas, rather than satellite accumulation areas, to allow more than 55 gal. at one time. The 90-day window now begins when an empty drum is positioned there, rather than when it has been filled and removed.

We have improved our document storage in the three-ring binders to provide easily-accessible information, and will continue to enhance our organization in this area.

I did note that we needed to update our EPA form 8700-12, as it had Alan Jones' name as the contact person here. I have searched Alan's electronic files to edit the document, but couldn't find it, so I have downloaded the form 6 instruction booklet from the EPA web site. I'll re-file the first of the week.

I wasn't sure about the proper response & documentation method here - I have many photographs to demonstrate a number of the actions taken above, and can also provide paperwork to support other changes that have been made. I didn't recall whether or not you intended a follow-up visit. Just let me know how we should proceed. Thank you.

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA hlinyard@smwpc.com 828-695-2755 fax 828-465-3447

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delate this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, <u>www.specialmetals.com</u>

.

🌈 RE: Spec	🖌 RE: Special Metals - Newton - Windows Internet Explorer													
🙋 https://ma	ail.nc.gov	/owa/?	ae=Pre	FormA	ction	3a=Re	ply&t=	=IPM.	Note&id	l=RgAA/	ABO40%	62bblbGZTLga	%2fZ0	obj4FYBwBTK%2fNLcV3pRJ99%2f35nTN9xACF1PRA6AABT 🌱
Send	0	0	8/	1	ŧ	2	ABC	-	- 🍣	🗈 Op	tions	Plain text	~	
A response	se was no	ot recei	ved fro	m Micr	osoft	Exchar	nge.							
🚺 То	Hewitt L	Linyard	[hlinya	rd@sm	wpc.	<u>coml</u>								
🛄 Cc														
Subject:	RE: Spe	cial Me	tals - N	ewton										

#### HL

Raleigh has started to work on your Compliance Order from the violataions found during the May 13, 2009 inspection.

Thanks for your earlier response. Please keep all of your information together. There will be a time later to present it again. Your working on it quickly will help in how it is viewed during the Order discussion.

One item that has already surfaced is the potential for contaminated soils around the baghouse #6 spillage.

Before the Order can be settled, there will have to be some documentation to show if the nearby soils are clean or contaminated. If contaminated, there will have to be a remediation plan executed. All of this work will have to be completed and documented before the Order can be finished. Therefore is would be best to go ahead and start the work on this.

Here is what needs to be done:

1- You need to contact Robin Proctor NCDENR Chemist to design a sampling plan for the area.

2- You will need to work with her to complete the required sampling, providing her with the results.

3- If the soils are not contaminated, then work with her to provide documentation stating such.

4-If contaminated, then work with her to develop a remediation plan and clean up standards. Execute. Once Executed, there will be the need for confirmation sampling to document that the clean up was effective.

5-Pull all this documentation together, to present to NCDENR for the Compliance Order settlement.

Roberta Proctor (Robin) Environmental Chemist Hazardous Waste Section phone/ fax 828-625-0171

Thanks.....S. Barron

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management

https://mail.nc.gov/owa/?ae=PreFormAction&a=Reply&t=IPM.Note&id=RgAAAABO40%2bblbGZTLg

# **Special Metals Potential Soils Contamination**

Barron, Steve

Sent:	Monday, July 27, 2009 3:31 PM
То:	Proctor, Roberta [roberta.proctor@ncdenr.gov]
Cc:	Burch, Brent [brent.burch@ncdenr.gov]
Attachments:	SpecialMetalWelding28MAY09~1.doc (986 KB)

RP

See attached draft facility report of Special Metals.

They were inspected on May 13, 2009, and will be getting an Order.

Brent asked me to get you involved on the issue of potential soil contaminations. The issue is Barium D005 solids waste spilled from a baghouse into rainwater onto nearby soils.

I will be sending them an email asking them to provide data to show that soils have not been contaminated. (They probably have not done any soil sampling, and would have to work thru you to determine where, how to sample the area.)

I guess the objective would be to get them to sample, using your sampling plan, to prove that nearby soils are not contaminated. and (I would think so) if contaminated, develop and execute a soil removal plan.

Thanks.....S. Barron

#### See attached photos #3 and 4.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mooresville, NC 28115

PLEASE NOTE MY NEW EMAIL ADDRESS : Steve.Barron@NCDENR.GOV

NOTICE: E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

\*

•

## RE: Special Metals - Newton

Follow Up. Start by Monday, June 15, 2009. Due by Monday, June 15, 2009.

 Hewitf Linyard [hlinyard@smwpc.com]

 Sent:
 Friday, June 12, 2009 5:20 PM

 To:
 Steve Barron [Steve.Barron@ncmail.net]

 Cc:
 Sean.Morris@ncmail.net

 Categories:
 I Red Category

Gentlemen :

•

I regret that this response has taken longer than planned. I mentioned earlier that many of our staff and a number of our production personnel have been out on mandatory vacation or layoff, which has delayed some of the follow-up action items related to your audit on May 13th.

1. Training - One of our Team Leaders has completed an online RCRA training course, and now has subsequently trained most of the required personnel here for our annual required RCRA instruction. This will be completed for all by mid-week.

2. Job descriptions - We have updated the job descriptions for me as QA Manager, Willie Logan our Production Manager, and Bobby Catoe our Process Engineer, to include the responsibilities related to hazardous waste management.

3. Contingency Plan - this has been updated.

4. The April hazardous waste manifest - in an earlier email I supplied a copy of this document with the signature from the recipient vendor.

5. Aisle space around hazardous waste barrels, pallets - We have dismantled the rack we were using for this, and now store these at ground level. The barrels are of course covered, and we inspect the area

https://mail.nc.gov/owa/?ae=Item&a=Preview&t=IPM.Note&id=RgAAAABO40%2bblbG... 6/15/2009

\_Gentlemen :

I regret that this response has taken longer than planned. I mentioned earlier that many of our staff and a number of our production personnel have been out on mandatory vacation or layoff, which has delayed some of the follow-up action items related to your audit on May 13th.

1. Training - One of our Team Leaders has completed an online RCRA training course, and now has subsequently trained most of the required personnel here for our annual required RCRA instruction. This will be completed for all by mid-week.

2. Job descriptions - We have updated the job descriptions for me as QA Manager, Willie Logan our Production Manager, and Bobby Catoe our Process Engineer, to include the responsibilities related to hazardous waste management.

3. Contingency Plan - this has been updated.

4. The April hazardous waste manifest - in an earlier email I supplied a copy of this document with the signature from the recipient vendor.

5. Aisle space around hazardous waste barrels, pallets - We have dismantled the rack we were using for this, and now store these at ground level. The barrels are of course covered, and we inspect the area weekly for accessibility.

6. Flux dust on drum exteriors - All drums have been cleaned, with the cleaning rags being placed inside one of the drums. Drum handlers have been instructed on maintaining them in a clean condition. Other preventive measures have been taken at the collection sites.

7. Collection sites - flux dust has been cleaned from the concrete pad under the drums. Catchment tubs have been placed under the drums to collect any spillage that might occur.

8. Satellite accumulation areas - A) Outside the extrusion press line and B) the bag house - Maintenance has worked on the drum-filling apparatuses, ensuring a tight fit on the drum lids. Also, these have now been designated as storage areas, rather than satellite accumulation areas, to allow more than 55 gal. at one time. The 90-day window now begins when an empty drum is positioned there, rather than when it has been filled and removed.

We have improved our document storage in the three-ring binders to provide easily-accessible information, and will continue to enhance our organization in this area.

I did note that we needed to update our EPA form 8700-12, as it had Alan Jones' name as the contact person here. I have searched Alan's electronic files to edit the document, but couldn't find it, so I have downloaded the form & instruction booklet from the EPA web site. I'll

https://mail.nc.gov/owa/?ae=Item&a=Preview&t=IPM.Note&id=RgAAAABO40%2bblbG... 6/15/2009

re-file the first of the week.

I wasn't sure about the proper response & documentation method here - I have many photographs to demonstrate a number of the actions taken above, and can also provide paperwork to support other changes that have been made. I didn't recall whether or not you intended a follow-up visit. Just let me know how we should proceed. Thank you.

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA hlinyard@smwpc.com 828-695-2755 fax 828-465-3447

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, <u>www.specialmetals.com</u> Gentlemen :

One item I wanted to follow up with in the short term was the signed hazardous waste manifest from our April 7 shipment, being the proof of delivery / receipt at Envirite in Pennsylvania.

We are working on the other issues you highlighted, and will respond with more documented detail soon. This is taking a bit more time, as our business has slowed abruptly, and about half our workforce and salaried staff had to take a week's leave or vacation this week, therefore leaving me a bit shorthanded. They will return on Tuesday, 5/26.

Thanks

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA hlinyard@smwpc.com 828-695-2755 fax 828-465-3447

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, <u>www.specialmetals.com</u>

P. 002

	INIFORM HAZARD	OUS 1. Gener	NCD98084	1951		2. Page 1 of	3. Emerge	828-46	4-035	2 4. Maniford	1 QC	237	71	
5	WASTE MANIFES	d Mating Addres	<u> </u>		·	J	Generatori	She Address	i dilerent th	IN mailing sodres		1231		
	Special M 1401 Bur Newton, M	etals We s Roed C 28656	Iding Produ	icts		•								-
	Transporter 1 Comos	IV NAME	vania, Inc.				<u> </u>	•			D0101	54045		<u></u>
17	of the Sponer 2 Compa	ny Name	······································							U.8. EPATON	unber	~		
	Designated Facility N	ame and She Ad	dress							US, EFA DI	lumber			
	Torshasted facily N Eawintie of 730 Voge York, PA Societys Phone: 80	Pennsyl Isong Rc 17404 10-878-16	vania, Inc. ad 318	•				, <sup>•</sup> by,		PA	00101	54045	; . . ·	
8		escription (inclut	tag Proper Shipping h		less, ID Number	ζ- -	-	10. Contain No.	ага Туре	11. Total Quentity.	12. Unit WL.Nol.	13.	Waste C	
CENERALUK -	X <sup>1,</sup> RQ, Haz	ardoua wa	sta, liquid, n.o		3082, PG	III.(D005)	• •	DOJ Teru	DM	165	G	DODE	•	· · · · · · · · · · · · · · · · · · ·
	X RQ, Haz	ardous wa	sie, solid, n.o.	8.9,NA	077, P.31	III (0005)	- 17	008	DM.	637	P	D005	· .	
	3. RQ, Haz	ardous Wa	sie, eolid, n.o.	B., 9 . NA3	1077, PG1	II (D005)		1.	DM	100	P	.DD05		
	4				·	•				100			- <u>.</u>	
	4. Special Handing In:	·	•					h.				- M. 1		
IŦ.	2. EW Appn	7943 8. 1064								•		iox# ••		
	6. GENERATOR AND marked and back	oval # 1534	4 File Ref.#3	UB28 ER	2 174 he contents of f	nts consignment	u are fully and Vicility friedd	accurately des accurately des	critica abov	h by the proper sh nextail tegulations	۲	teller a, and are ch bna knowler	S.O.	93
	6. GENERATORS/C marked and beet	oval # 1534 Presor's car objacitod, and hat the contents aris minimization	4 File Bief. # 1 (TIFICATION: 1) herek I are in sil (aspecte b) of this consignment of atalament i dentitied 1	UB28 EFC	2 174 Ini contents of f n for transport ar mus of the attact	hed EPA Acknow	Wadament of	(Consent		•	۲	nalier #	SO Antheo P	<b>23</b>
	6. GENERATORY BIC marined and babels . Expanse. I confly to i confly that he was seneration a Colorors Pa	oval # 1534	4 File Bief. # 1 (TIFICATION: 1) herek I are in sil (aspecte b) of this consignment of atalament i dentitied 1	UB28 EFC	2 174 Ini contents of f n for transport ar mus of the attact	had EPA Acknoy mge quantity gej 81	Wadgment of Anisiator) of (1 Granura	(Consent		•	۲	nalier # a, and are ca hyment and c	445 A 4	93 7 7 10
	6. GENERATORY ( marined and labels Exports:, I cartify f i cartify that the un generatory Otherors Pr	oval # 1534	14 Files Roft # 3 ITFICATION: I henk was high expected by of this consignment or stationentil identified I I Import to U.S.	UB28 EFC	2 174 Ini contents of f n for transport ar mus of the attact	hed EPA Acknow	Wadgment of Anisiator) of (1 Granura	(Consent	i quantity ge	•	۲	nalier # a, and are ca hyment and c	का र का रहा	93 7 7
	6. GENERATORY A marined and babes bounded in the set bound of the set is an in the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set o	oval # 1534	14 Files Roft # 3 ITFICATION: I hereit ine in sil respecte by of this consignment of stationent I bentfied I a I import to U.S. for of Malerize	US28 FR	2:174 Ini contagits of f n for transcort ar Imit of the stact T(2) (if I con p in	hed EPA Actinot inge quantity pa 59 Export from	vicedomento animiador) or (t Granura P (13	(Consent ) (if I am a small )	i quantity ge	•	۲	A roller	<u>2</u> 12	3
	6. GENERATORY ( marked and babels Expanse. L cently 5 certify thet the un generator a Coloror's Pr Coloror ( 6. Internetional Shipm Transportar signature (7. Theneportar Acknowl Transportar printed Th	oval # 1534 PRENCR'S CEEP add/backdod, and hat the contents and an intention for expanse only to adgment of Recor- prod Name	14 Files Roft # 3 TIFICATION: I hereit are to all respects by of this consignment or stationenti locationed to a limport to U.S.	US28 FR	2:174 Ini contagits of f n for transcort ar Imit of the stact T(2) (if I con p in	her EPAAchnon nge quantity per	wiedgment o niniatur) of ( Stature 2 (13	(Consent ) (if I am a small )	i quantity ge	•	۲	A roller	का र का रहा	
	6. GENERATORY A marined and babes bounded in the set bound of the set is an in the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set of the set o	oval # 1534 PRENCR'S CEEP add/backdod, and hat the contents and an intention for expanse only to adgment of Recor- prod Name	14 Files Roft # 3 ITFICATION: I hereit ine in sil respecte by of this consignment of stationent I bentfied I a I import to U.S. for of Malerize	US28 FR	2:174 Ini contagits of f n for transcort ar Imit of the stact T(2) (if I con p in	her EPAAchnon nge quantity per	vicedomento animiador) or (t Granura P (13	(Consent ) (if I am a small )	i quantity ge	•	۲	A roller	<u>2</u> 12	
	GENERATORY (         Marked and babes Expanse. I cantly Scartly that the un Scartly	oval # 1534	14 Files Roft # 3 ITFICATION: I hereit ine in sil respecte by of this consignment of stationent I bentfied I a I import to U.S. for of Malerize	US28 FR	2:174 Ini contagits of f n for transcort ar Imit of the stact T(2) (if I con p in	her EPAAchnon nge quantity per	wiedgriento virianto) of (1 Shariya 2013 2013 Shariya 2013 Shariya 2013 Shariya 2013 Shariya 2013 Shariya 2013 Shariya 2013 Shariya 2013 Shariya 2013 Shariya 2013 Shariya 2014 Shariya Shariy Shariya Shar	Corpent. ) [f   am à strad	i quantity ge	•	۲	A roller	<u>2</u> 12	
	GENERATORY (         Marked and babe)         Expanse. I cantly the set Expanse. I cantly the set Scartify that the set Scartify t	oval # 1534	14 Files Roft # 3 ITFICATION: I hereit ine in sil respecte by of this consignment of stationent I bentfied I a I import to U.S. for of Malerize	US28 FR	2:174 Ini contagits of f n for transcort ar Imit of the stact T(2) (if I con p in	her EPAAchnon nge quantity per	madgmento ministury or (t Strange galaxies spining spi	(Consent ) (if I am a small )		•	ipping nem	A roller		
	GENERATORY (         Marked and babes Expanse. I cantly Scartly that the un Scartly	A 1534	14 Files Roft # 3 TIFICATION: I hereig 10 m hist on expendent in attriement Mentfield 1 1 Jumport to U.S. Actual Maintests 3 , M/22,	US28 FR	ar174 he contexts of F n for transport as mm of the stars (1) of transport (1) (1) on p is []	her EPAAchnon nge quantity per	madgmento ministury or (t Strange galaxies spining spi	Corpent. ) [f   am à strad Port of ent Date Jearly Factor		MW	ipping nem if export at 	A roller		2 2 2 1
	GENERATORY (     marined and labels     Expanse. I confly     Scartily that the un     Senerator UCGenors Pr     Scartily that the un     Senerator UCGenors Pr     Scarting the UCGenors     Scarti	A Canana	A File Rof. #3 TFECTION: I here in a sol respective to statement I dentified I I Import to U.S. At al Malerize T, M/2.	US28 FR	a 174 hi contauts of F n for transport in mm of the staco tr(a) (# I cm p in [	her EPAAchnon nge quantity per	madgmento ministury or (t Strange galaxies spining spi	Corpent. ) [f   am à strad Port of ent Date Jearly Factor		MM Partial Re	ipping nem if export at 	A roller		2 2 2 1
	GENERALDICENC marked and back Expanse. I confly I confly that the un Renerator & Offenors Pr Generator & Offenors & Offenor	A Canana	A File Rof. #3 TFECTION: I here in a sol respective to statement I dentified I I Import to U.S. At al Malerize T, M/2.	US28 FR	ar174 he contexts of F n for transport as mm of the stace (1 cm p in (1 cm p in (1 cm p	her EPAAchnon nge quantity per	madgmento ministury or (t Strange galaxies spining spi	Corpent. ) [f   am à strad Port of ent Date Jearly Factor		MM Partial Re	ipping nem if export at 	A and are constructed and are constructed and are constructed and a constructed and		2 2 2 1
	GENERATORY (     marined and labels     Expanse. I confly     Scartily that the un     Senerator UCGenors Pr     Scartily that the un     Senerator UCGenors Pr     Scarting the UCGenors     Scarti	A Contraction of the contraction	A File Rof. #3 (TFICATION: I here) in a sol respective by of this consignment or statement i dentified I I Import to U.S. At al Malerizs Councey 10 Councey 10 Councey 10 Councey 10 10 10 10 10 10 10 10 10 10	UB28 FR	a 174 he contacts of f n for transcort as mm of the shoot r(a) (fill on p is 	Epoch form	madgraphic of C	Corpent. ) (f I am à strad Port of en Late Market (Late Market Residue		MM Partial Re	ipping nem if export at 	A and are constructed and are constructed and are constructed and a constructed and		2 1 No 2 1 Rejection
	C. GENERATORY A marked and back Exports. I cantly the Exports. I cantly the same seneratory that the same seneratory that the same seneratory to the same seneratory to the same seneratory to the same seneratory to the same reaction and the same seneratory of	A constant of the second secon	A File Rof. #3 (TFICATION: I here) in a bill respecte by of this consignment or statement I dentified I I Import to U.S. Stat of Malerizz Councily 12 12 12 12 12 12 12 12 12 12	COR28 FR	art74 his contauts of f n for transport is mins of the stace r(a) (61 cm p is ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ]	EPAActnoy mpe quantity per Export form	international and analysis of the second sec	(Corpent. ) (f 1 am à strad ) ff 1 am à strad Port of ent Dete Jesty (Dete Jesty (Dete Jesty) (Dete Jesty) (D	And the second s	I Partial Re	ipping nem if export at 	A and are constructed and are constructed and are constructed and a constructed and		2 1 Ny 2 1 Ny 2 1 Rejection
	GENERATORY (         Marked and basis         Expanse. I cantify         Scartify that the un         Scartify that         Scartify th	Oval # 1534	A File Rof. #3 (TFICATION: I here) in a bill respecte by of this consignment or statement I dentified I I Import to U.S. Stat of Malerizz Councily 12 12 12 12 12 12 12 12 12 12	COR28 FR	art74 his contauts of f n for transport is mins of the stace r(a) (61 cm p is ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ] ]	EPAActnoy mpe quantity per Export form	international and analysis of the second sec	(Corpent. ) (f 1 am à strad ) ff 1 am à strad Port of ent Dete Jesty (Dete Jesty (Dete Jesty) (Dete Jesty) (D	142a	I Partial Re	ipping nem if export at 	A and are constructed and in the second are constructed are constructed and in the second are constructed		2  0 2  0 1 Rejection

Special Metals - Newton

Subject: Special Metals - Newton Trom: Hewitt Linyard <hlinyard@smwpc.com> Date: Fri, 22 May 2009 14:26:56 -0400 To: <Steve.Barron@ncmail.net>, <Sean.Morris@ncmail.net>

Gentlemen :

One item I wanted to follow up with in the short term was the signed hazardous waste manifest from our April 7 shipment, being the proof of delivery / receipt at Envirite in Pennsylvania.

We are working on the other issues you highlighted, and will respond with more documented detail soon. This is taking a bit more time, as our business has slowed abruptly, and about half our workforce and salaried staff had to take a week's leave or vacation this week, therefore leaving me a bit shorthanded. They will return on Tuesday, 5/26.

Thanks

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA <u>hlinyard@smwpc.com</u> 828-695-2755 fax 828-465-3447

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com

	<b>Content-Description:</b>	20090522141507682.pdf
20090522141507682.pdf	<b>Content-Type:</b>	application/pdf
	<b>Content-Encoding:</b>	base64

DESIGNA

e

Printed Upen Hame

	PM ENVIRITE OF PENN		AX No. 717	854 6	1757		<u>P. 002</u>	••••••••••••••••••••••••••••••••••••••
<b></b>						DIL	911.	•
e print or lype. (Form designed for us		2.Page 1 of 3. End	EDITION REMOVING	hone	4. Manifert 1	the second s	Approved, OMB	No. 2050-003
MADIE MANUEDI	ICD980841951	1 1	•		1 44	199	2371	FLE
Generators Ninite and Mathing Addings Special Metals Weld 1401 Burris Road Newton, NC 28658 Senerators Phone: 620-405-0	ding Products		dor's Sile Address (A	-aniererry ch				
Transporter 1 Company Name Envirtue of Pennsylv Suprisporter 2 Company Name	ania, Inc.					20101	54045	
×	•							
Lossingled Facily Name and Sta Addr Eduction of Penns Viv 730 Vogelsong Ros Vořk, PA 17404 Vořk, PA 17404 Seinys Phone	es ania, inc. ad \$8	•	. <sup>*</sup> *3'				54045	
8. 9b. U.B. DOT Description (includin M and Pations Group (il stry))	Proper Shipping Name, Hazard Class, ID Numb	к	10. Containe No.	Тура	11. Total Quentity.	12. Unit	13. Waste	Codes
	is, liquid, n.o.s., D , NA3082, PG	III.(D005)	003	DM	165	Ġ	D005 ·	·
2. RQ, Hazardous was	ie, sold, n.d.s., 9, NA3077, PB	111 (0005)	010	DM	657	A	D005 ·	
3. RQ, Hezerdous was	17, 9010, n.a.s., 9 , NA307/7, PG	111(0005)		DM.	EST 100	P	.D005	·· · · · · · · · · · · · · · · · · · ·
4.	· · · · · · · · · · · · · · · · · · ·	•			••			
14. Special Handling Instructions and Add 1. EW Approval # 16842 2. EW Approval # 16843 3. EW Approval # 16344	<b>Konel Information</b> 2 file Ref. #1(4853)ERG 171 3 File Rot. #1()827 ERG 171 4 file Rot. #3()828 ERG 171	•		r			ox#	
A. GENERATOR BIOFFEROR'S CERT marked and isbeladipiscinded, and a	TERCATION: I hereby decising that the contents of i and high respects in proper objection for transport a this construction contents to the terms of the state talement identified in 40 QFR 282.27(a) (6) am a l	his consignment are fully according to applicable in the EPA Acknowledging	and accurately desc rediational and pasta of of Consent.	rited shove nel governm	by the proper shi enter regulations.	oping nama V suport shi	, and are cleasified; prochland i sinthe	particular Particular Particular
exhances a carrily and his countries of	/a(en::h)(en:ined in 40 C)+R 262.27(a) (6 ) 6m # )	with drauph terrary (		Othendity 660				
energior a Offeror's Printed Typed Name		Signature	A fol fu i mita suisa		eresort is true.	•	Month	Pary year
Shannon Lai	<u></u>		in the second second	3 de	ierosian) in fruin.			
Anternational Otheron's Planted Name Shannon Los : 6. Internetional Scipmonis	I Importe U.S.	Encod from (3)	Part pl and	3 de		······································		
Anternational Shapmonts Printed Typed Name Shappon Shappon Concerning Shapmonts Transporter elements (for exports only): 7. Theneporter Acknowledgment of Ficeelph Shappont Chicken (for exports only):	] Import to U.S. R of Maluctete		in the second second	3 de	Mal			
Anternational Statements Planted Name Statement Statements International Statements Transporter Astrownadgement of Receips Statement of Receips State	I Importe U.S.		in the second second	3 de	and the frame	· · ·	Manih 1-97:1	
Anternetional Stopments Transporter Algorithments Transporter Algorithments Transporter Algorithments Transporter Algorithment of Receipt reinsporter J. Printed/Typed Name Transporter 2 Printed/Typed Name	] Import to U.S. R of Maluctete	Deposition ().	in the second second	3 de	and the frame	······································	1-11-1 1-11-1	
Anternational Statements B. International Statements Transporter algorithms (for exports only): 7. Thereporter Acknowledgement of Receipt remoporter 2 Printed/Typed Name Transporter 2 Printed/Typed Name B. Discreponcy	] Import to U.S. R of Maluctete	Canaline Signature	Part of entr	P. 1	Partial Rej	·	1-1/2-1 0-2/1 1-1	
Anternational Otheron's Printed Typed Natrie B. International Statements Transporter eignature (for exports only): 7. Transporter Acknowladgement of Receip ransporter 2 Printed/Typed Name B. Discreptency B. Discreptency	I Japon to U.S. col Malertete , MJ4:LER, J	Canaline Signature	pondone Despirator	2. I	Q. <sup>22</sup> My		1-1/2-1 0-2/1 1-1	7. 1219 201 201 201 201 201 201 201 201 201 201
Anternational Othern's Printed Typed Name (a. International Statements) Transporter eignature (for exports only): Transporter eignature (for exports only): Transporter 2 Printed/Typed Name Discrepancy (Atcolon Space 3173 474 58 (a. Discrepancy (Atcolon Space 3173 474 58 (b. Atternata Fecity (or Generator) Scith/a Phone; So. Eignature of Alternate Fecity (or Gen	I Import to U.S. a of Mainstate MILLER, J. Currestly 125 MARINA	Cigniture Signature	Part of entr Detectory	2. I	A.		1-1/2-1 0-2/1 1-1	7. 1219 201 201 201 201 201 201 201 201 201 201
Seperator a Otheror's Printed Typed Name (6, Internetional Statements) Transportar elements (for exports oright (7, Thereporter Acknowledgment of Receipt (7) Thereporter Acknowledgment of Receipt (8) Atternate Fecility (or Generator) Facility's Phone; (8) Atternate Fecility (or Generator)	I Import to U.S. a of Mainstate MILLER, J Currestly 125 125 MARINA 125 MARIN 125 MARIN	Cigniture Signature	Part of entr Detectory	2. I	A.			Day Con Day Ages Day Res Rejection

Q

Kenskin KIRB 2 EPA Form 8700-22 (Rev. 205) Previous editions are obsolete. 07 07 DESIGNATED FACILITY TO GENERATOR STATE OF REQUIRED 9.3770207112 s., ۲.

ease	print or type. (Form desig	ned for use on elite (12-pitch) typewi	riter.)							Approved.	OMB No.	2050-003
U	NIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	0724		3. Emergency Res		ま むなおつ		159	au61	L1 F	E
5.	Generator's Name and Mailin	ng Address	·····	·;!	Generator's Site Ad	dress (i	different that					
G	Spercial Metals A 1401 Burts Fus Naw ton, NC 290 merators Phone: Transporter 1 Company Nam	Nelding Products 3d 659 1495 osta							<u> </u>	002	246	۱ 
1								U.S. EPA ID N	umber			
7.	Transporter 2 Company Nam	8 14:						U.S. EPA ID N	umber	antial.	·	
8.	Designated Facility Name an	d Site Address			<u></u>			U.S. EPA ID N	umber			
F	Envinte ef Obio, 2059 Cantral Au Capton, Old 447	venue, SE						055	N9805	68092		
9a H	a. 9b. U.S. DOT Descripti	ion (including Proper Shipping Name, Haz	ard Class, ID Number	,	10.0 No.	Containe	ers Type	11. Total Quantity	12. Unit Wt./Vol.	13.1	Waste Code	 95
	1. Fila, Ethanitory X	n wasta, eulid, n n.a. (19965).	4_1143577_P	ម៉ូ ឲ្		4	DEA	3215	β	-1:603		<u> </u>
	2.	<u>.</u>				-+	LANK:	5215			 	
' 	×	es mente, ligest, ir p.a. (Renter 	a, 9, 1143632 	FB 8		6 50	CYA	5883	Ρ	TRUG		<u> </u>
	3. Real theorem	is mata, nalid, n a n (17695),	9_HA3977_P	1. <b>2</b>						- EEBS	 	<b> </b>
	<u>v</u>				4	ميز	<u>D44</u>	2,2.45	P		ļ	<u> </u>
	4.					Í					ļ	<u> </u>
					ļ						<b>.</b> .	
1	marked and labeled/placa Exporter, I certify that the	DR'S CERTIFICATION: I hereby declare arded, and are in all respects in proper cor contents of this consignment conform to t nimization statement identified in 40 CFR	ndition for transport ac he terms of the attach	cording to applic red EPA Acknow	able international a edgment of Conser	nd natio nt.	nal governm	ental regulations.				
G	enerator's/Offeror's Printed/Ty	<b>7</b> 1		Sig	ature Alam	ý.					onth Day つらi】/】	
	<ol> <li>International Shipments</li> </ol>	Import to U.S.	[	Export from		rt of ent						
	ransporter signature (for expo 7. Transporter Acknowledgmer				Da	e leavir	ig U.S.:					
亅	ansporter 1 Printed/Typed Na			Sig	nature	Ī.				Mo	onth Day	y Yea
	ransporter 2 Printed/Typed Na	rlur		I	nature A	<u>n</u>					<u> 1 イ //</u> xnth Day	V   0 V Ye
2 "	ansporter z Printed Typed Na	ane		l	hatare							, ie
	8. Discrepancy											
1	Ba. Discrepancy Indication Sp	Dace Quantity	Туре	_	Residu	e	_	Partial Rej	ection		Full Re	jection
- 1	8b. Alternate Facility (or Gene	erator)			Manifest Re	ference	Number:	U.S. EPA ID N	lumber			
								•				
	acility's Phone:							1				
	8c. Signature of Alternate Fac	cility (or Generator)		7 <sup>-7</sup>						M I	lonth Da	ay Ye I
5 1	9. Hazardous Waste Report N	Management Method Codes (i.e., codes fo	or hazardous waste tre	eatment, disposa	I, and recycling sys	tems)					!	_!
آ ا	· · · ·	2.		3.				4.				
12	0. Designated Facility Owner	or Operator: Certification of receipt of haz	ardous materials cove	ered by the mani	fest except as noted	t in Item	18a					
	rinted/Typed Name			Sig	nature					M	onth Da	y Yea
<u>+ </u>			·									
	0rm 8700-227 (Rev. 3-05)	Provinus aditions are obsolate							~		AD1A 1117	-

i

Dion		rint or type. (Form desig	nod for u	se on elite l	12_oitch) typ	ewriter.)						Form/	Approved. ON	B No. 205	0-0039
1	UN	IFORM HAZARDOUS	1. Genera	ator ID Numb	er		2. Page 1	1	rgency Response P				nber	FL	E
11	5. 6	enerator's Name and Mailin	ng Address	3		•		General	or's Site Address (it	different that	n mailing address	5)			
$\left\{ \left  \right  \right\}$	<b>C</b>			t ja Transco L				1			Л	ef	002,	ť (p	
	6.1	renator's Phone: ransporter 1 Company Nan	ne -								U.S. EPAID N	umber			
11		The etter of a good													
	7.1	ransporter 2 Company Nar	ne -								TUS, EPAID N	umber	•		
		Designated Facility Name a									U.S. EPA ID N	umber			
11													. <del>.</del>		1
11	50	alitys Phone:									1	• • • •	•		
	93.				hipping Name,	Hazard Class,	ID Nurrber,		10. Contain	ers	11. Total	12. Unit	13 1/2	ste Codes	
	HN								No.	Туре	Quantity	WL/Vol.			
		1. 													
18					194 - 9834 	ingent and	••••				3215	4			
GENERATOR	┝	<u>-  </u> 2.										╎╧─┤			
し 辺							Silili yatik		4						
ĪĪ	1	· •				•				CLA.	2002	F			
	$\vdash$	3.												1	
		144 M ++ 5 19	$(\mathbf{x}_1, \mathbf{y}_2, \mathbf{y}_2)$	19. M. A.		and she th	***27 - <u>*</u> 19 - 12								
	L	<u>`</u>							1.1.1	<u> </u>	3.7. 42				
11		4.										[		ł	
11	14	. Special Handling Instruction	cns and Ac	disional Infor	mation					L	L	l			
	-	GENERATOR S/OFFEF marked and labeled/plac Exporter, I certify that th	COR'S CER arded, and e contents	RTIFICATION d are in all re- of this const	I: I hereby der spects in propr mment conform	clare that the co or condition for m to the terms o	Intents of this consignation transport according to of the attached EPA Ac	applicable in mowledgme	ternational and national and nati	onal governn	nental regulations				
11	G	I certify that the waste m enerator's Offeror's Printed/			lenthed in 40	CFR 252.27(a)	(If I am a large quantity	Signature		In quantity go	enerator) is true.	<u> </u>	Мопи	Day	Year
		23 +	<i>"</i> 1		$N \in \mathbb{R}^{2}$			1 2		ir	. •·		10	4.6	108
Ē	1	International Shipments		Import to			Event	rom U.S.	Portofen						<u> </u>
INTL	Τ	ansporter signatura (for ex	ports only)						Date leavi	-					
16	17	. Transporter Acknowledgm		cipt of Materia	z's			15					·····		
TR ANSPORTER	; "	ansporter 1 Printed Typed N						Signature	1 Mar				Month	Day - I	Ycar
L S S		ansporter 2 Printed/Typed I		1.07				Signature	<u></u>				Month	Day	⊖ ∫ Year
 ¤								1					1	1	1
Ľ.		3. Discrepancy						<u> </u>							·
	18	a. Discrepancy Indication S	Space	Quanti		1	Туре		Residue		Partiel Re			Full Rejer	rtion
					G.				L Ne3:008			-Jection I		u tu neja	1.04
									Manifest Reference	Number:					
ΠĒ		3b. Alternate Facility (or Ge:	'erator)								U.S. EPAID	Number			
											1				
GNATED FACILITY		acTity's Phone: 36. Signature of Alternate Fi	acility (or C	Generalcr)	· · · · · · · · · · · · · · · · · · ·								Mon	th Day	Year
IA		-											I	1	ł
15	2   7	9. Hazardous Weste Report	Managerr	ent Method (	Codes (i.e., cox	des for hazardo	us waste treatment, di	sposal, and	recycling systems)						-1
	1				2.			3.			4.				
	L														<u></u>
	<u> </u>	0. Designated Facility Owne	er or Opera	ator: Certificat	tion of receipt of	of hazardous m	atcrials covered by the		the second s	m 18a					
	P	nnled/Typed Name						Signature	3				Mor: 1	th Day	Year
1	1		<u> </u>					<u> </u>							1
EF	ΆF	orm 8700-22 (Rev. 3-05	) Previou	us editions :	are obsolete.							C	GENERATOR	R'S INITIA	AL COPY

\_,

.....

Plea	ase print or type. (Form desig		i) typewriter.)	- <b></b>		<u> </u>				Approved.	OMB No. 2	2050-0039
1	UNIFORM HAZARDOUS	1. Generator ID Number	09 <u>44854</u>	2. Page 1 of		ev Response	4. 17:25.14		153	<sup>mber</sup> 3196	<u>50 F</u>	LE
	5. Generator's Name and Maili	ng Address	NOT THE ROWS A	,	Generator's	Site Address (	if different th	an mailing address	5) 			
	Spoctal Melaks 1401 Burris Rov New Ion, NO 28 Generators Phone: 200 6. Transporter 1 Company Nan	Welding Anoducts ad 658 467 April		I								
	6. Transporter 1 Company Nan	ne			·			U.S. EPA ID N	umber			
	7. Transporter 2 Company Nar	ne						U.S. EPAID M	umberviv	a		
	8. Designated Facility Name an	nd Site Address						U.S. EPA ID N	umber			
	Envirite of Chilo 2050 Central A Canton, OH 447 Facilitys Phone: 200	, hc. Venus, SF 707						्रान 	D9805i	68992		
		ion (including Proper Shipping N	ame, Hazard Class, ID Number	;		10. Contain No.	ers Type	11. Total Quantity	12. Unit Wt./Vol.	13. \	Waste Code	s
GENERATOR -	1. PQ. Hozordau 7 M	is waala, sold, pars (	0005) 9,1143077, F	1) 11		5	24	7275	P	-10005-		
ENER	2.							to 1 .				<u> </u>
0	×	er Wasto, bytel, n.n.s. (	Borney 9, MA3982.	PG 8		6	CNA	5883	12	- Contra		
	3. FO, Hurnedra X	s vasu, sout, a e s (	0395), 0-, NA3077, P	经期		4	FP2.4	22.45	P	<b>Bee5</b>		
	4.							<u>, , , , , , , , , , , , , , , , , , , </u>	- <b>-</b>			
ļļ	14. Special Handling Instruction	ns and Additional Information						L	L	!		<u> </u>
	A. EW Approval B. EW Approval C. EW Approval	# 10828 File Ref. # 10766 File Ref. # 10827 File Ref.	# C\$5809 ERG 17 8 C\$5574 ERG 17 8 C\$6810 ERG 13	74 71 71								
	marked and labeled/place Exporter, I certify that the	OR'S CERTIFICATION: 1 hereby arded, and are in all respects in p contents of this consignment co nimization statement identified in	roper condition for transport ac nform to the terms of the attach	cording to appli ed EPA Acknow	icable internative of the second s	tional and natio Consent.	onal governn	nental regulations.				
	Generator's/Offeror's Printed/T		40 CFR 202.27(a) (if 1 and a la		gnature	(ir i am a sma	ii quantity ge	nerator) is true.		Mor	ith Day	Year
<u>,</u>	10. 11.	·		[_		e	i p.a+'				111	05
	16. International Shipments Transporter signature (for exp	Import to U.S.	[	Export from	U.S.	Port of ent Date leavi						
		nt of Receipt of Materials										
TR ANSPORTER	Transporter 1 Printed/Typed N	D A		Sig I	gnature		<u>\`\</u>			Mor	th Day	Year
ANSI	Transporter 2 Printed/Typed N	ame PINNPY		I	gnature	<u>iste</u>	<u>Irighta</u>	<u> </u>		Mor	hth Day	Year
E												
1	18. Discrepancy 18a. Discrepancy Indication Sp											
		Quantity	Ц Туре			Residue f <u>est Reference</u>	Number:	Partial Rej	ection	[	Full Rej	ection
	18b. Alternate Facility (or Gen	erator)						U.S. EPA ID N	lumber			
FACI	Facility's Phone:							1				
DESIGNATED FACILITY	18c. Signature of Alternate Fai	cility (or Generator)								Ma I	onth Da	y Year
SIGN	19. Hazardous Waste Report	Management Method Codes (i.e.	codes for hazardous waste tre	eatment, disposa	al, and recycl	ng systems)				<u>_</u>		
	1.	2.		3.				4.				
		or Operator: Certification of rece	ipt of hazardous materials cove			is noted in Iten	n 18a	L				
	Printed/Typed Name			Si	gnature					Mo	onth Day	/ Year
FP	A Form 8700-22 (Rev. 3-05)	Previous editions are obsolu								ENEDATO	DIO INUT	

Atta:

Willie LogAN

Please sign the NEW MUNIFEST AND Beturn TO MY Attention. CALL if you have Any QUESTIONS THANKYOU John McDONIALD 1-200-858-9423

PS. Also Keep bottom copy-for your remotors.

Steve,

Newton.

Please see the attachment regarding the D005 hazardous waste manifests from September. Since this occurred while Alan Jones was still here, I am making a guess as to how we ended up with two documents -

The Envirite driver prepared a manifest (1590611) with the number of containers by category printed on it (5+5+5), but had to change two of the quantities manually (to 5+6+4). Alan Jones signed the manifest.
 When the truck arrived at Envirite, John McDonald at their office created a new manifest with the correct quantities printed on it (5+6+4 - 1591960), and sent it to Willie Logan, who would have helped driver load the truck, with Alan Jones in observance. Willie signed the corrected manifest.
 Alan Jones left the company on the morning of 9/15.
 Envirite provided a copy of the signed manifest (1591960) to us in

Let me know if you have questions. Thanks

Hewitt Linyard Special Metals - Newton

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, <u>www.specialmetals.com</u>

Dies.		ned for use on elite (12-pitch) typ	evriter )						Form	Approved.	OMB No. 2	050-0039
	UNIFORM HAZARDOUS	1. Generator ID Number		ige 1 of	3. Ernerger	cy Response	Phone	4. Manifest 1	racking Ne	mber		
	WASTE MANIFEST	Alexandre A	1951		O	17-112 12	Anora	an mailing address	1.5	9061		LE
1	5. Generator's Name and Mail	ng Address	•	·	Generators	She Address (	n orerent un	au unsang Boules	3)			ł
	1401 Hurris Rus Navy Jun NO 29 Generators Phone:	659 6 405 6050		1		•		へ	ef	002	24%	
	6. Transporter 1 Company Nan	8						U.S. EPAID N	lumber			
	Physites of Calico 7. Transporter 2 Company Nan	- <u>ku:</u> 19			·			U.S. EPAID N	umbert	antine	•	
	8. Designated Facility Name an	nd Site Address						U.S. EPAID N	lumber			{
	Envirtie of Ohio 2050 Central Av Factory's Phone. OH 444 Factory's Phone. OH 444	venue, SE				•		HO I	rneos	68002		
	9a. 9b. U.S. DOT Descript	ion (including Proper Shipping Name, I	lazard Class, ID Number,			10. Contair	ers	11. Total	12. Unit	13 1	Waste Code:	
	HM and Packing Group (If	any))				No.	Туре	Quantity	WIL/Vol.			· ·
GENERATOR	1. POLIbranka X	n washe, eokid, a wa qimili	5), Q., (453077, <b>P</b> /J B			5	Ded	3215	A	-1:575		
GENEI	2. Mit Hazardou	s words, least a p.s. (Rol	166), 9, 1013032, FG 1	*		4		<u> </u>		13105		
	X					مهتر	ima.	2883	<u>p</u>			
		s warda, saƙi, ma a (100	8月9月1143677,667月			·1.50	134	2,2,45	4	-EXANS		
	4.											
	14. Special Handling Instruction											
IÍ	A. EW Approval B. EW Approval C. EW Approval	# 10826 (%) Rof. # C # 10786 (%) Rof. # C # 10827 (%) Rof. # C	\$6800 ERG 171 55574 ERG 171 56810 ERG 171									
	marked and labeled/place Exporter, I certify that the	OR'S CERTIFICATION: I hereby deck anded, and are in all respects in proper contents of this consignment conform	condition for transport according to the terms of the attached EPA	to applic Acknow!	able Internation	ional and nati Consent.	nnsvog land	iental regulations.				
	I certify that the waste ma Generator's/Offeror's Printed/T	nimization statement identified in 40 Cl yped Name	R 262.27(a) (if I am a large qua		erator) or (b) nature	(if Lam a sma	l quantity ge	nerator) is inte.		Mor	nîn Day	Year
L	ALA.	J JONES	<u> </u>		ala	<u>n. 4</u>	tr	<u></u>		C	9911	08
INTL	16. International Shipments Transporter signature (for exp	Import to U.S.	Exp	ort from l	U.S.	Port of ent Date leaving						
西		nt of Receipt of Materials								1100		
TR ANSPORTER	Steve	Ë,-hur			nature	th				ा 	ith Day   1 / /	Year OS
RAN	Transporter 2 Printed/Typed Na	ame		Sign	naturø	· · · · ·				Nor	nan Day 1	Year
<b>IF</b>	18. Discrepancy								· · · · · · · · · · · · · · · · · · ·			
	188. Discrepancy Indication Sp	vace Quantity	Тура			Residue		Partial Rej	ection		Futi Reja	ection
Ľ	18b. Alternate Facility (or Gene	erator)			Mani	est Reference	Number:	U.S. EPA ID I	lumber			
GNATED FACILITY								t		-		[
	Facliny's Phone: 18c. Signature of Alternate Fac	zity (or Generator)		14	,,			_1		Mc	mth Day	Year
NO.	19. Hazardous Waste Report	lanagement Method Codes (i.e., code	s for hazardous waste treatment	discosa	l and recycli	no evsterns)						]
	1.	2.		3.		<u>, , , , , , , , , , , , , , , , , , , </u>		4.				
	20. Designated Facility Owner	or Operator: Certification of receipt of I	hazardous malerials covered by	the mani	fest except a	s noted in Itan	n 18a			· ·		
	Printed/Typed Name		······		erutsn			···		Mo	nîn Day	Year
I €P/	A Form 8700-22 (Rev. 3-05)	Previous editions are obsolets.					······	•		ENERATO		
									G	ENERALL	in a ini li	AL UUPY

.......

.

Willie LogAN

 $\langle \rangle$ 

( )

Please sign the NEW MUNIFEST AND Beturn TO MY Attention. CALL if you mave Any QUESTIONS THANKYOU Ubhn McDONIALD 1-800-858-9423

P.S. ALSO KEEP bottom copy-loe your records.

Plea	ese print or type. (Form designed for use on elite (12-pitch) typewriter.)						Approved.	OMB No. 2	050-0039
Î	UNIFORM HAZARDOUS 1. Generator 10 Number WASX. MANIFEST	2. Page 1 of		at and a		115	9 <u>1</u> 96	50 F	LE
	5. Generator's Name and Mailing Address		Generator's Sita Addres	is (if different th	an mailing addres	s)			_ (
	Spectral Metals Wahling Andreds 1401 Burris Road energing Phone: 200, 200 6. Transporter 1 Company Name	l			U.S. EPAID N	lumber			
	Fluckliz of Theo kin								
	7. Transporter 2 Company Name				U.S. EPÁID N		(#317 <b>(</b> 77)		
	8. Designated Facility Name and Site Address				U.S. EPAID N	lumber			
	Envirite of Cheo, tec. 2050 Central Avenue, SF Capton, CAI \$4707 Facilitys Phone: ana 716 cenc				CH4	09805	63992		
	ga.         9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Cont No.	ainers Type	11. Total Quantity	12. Unit WL/Vol.	13.\	Vaste Codes	
GENERATOR -	1. Au. Herzerdaus wasta, 2013, 11 n.s. (1005), 11, 11/13072, 421 J. N	) N	5	Ŭ.M	-275	P	-13035-		
	2. NO, Hoxenkus wash, liquU, ninis (Dorken), O , MA3082. 1 X	(4) B	5	CMA	5883	P	- <del>Dons</del>		
	3. fK3, Hardedous Waste, ackl, n o.s. (18105), 9, 1143077, 143 w	) <b>D</b>	4		2245	P	-5885		
	4.								
	14. Special Handling Instructions and Additional Information				l				
	A. EW Approval # 10828 File Ref. # CS5809 ERG 171 B. EW Approval # 10765 File Ref. # CS5574 ERG 171 C. EW Approval # 10827 File Ref. # CS5810 ERG 171 15. GENERATOR'S/OFFEROR'S CERTIFICATION: Thereby declare that the contents of this		ane feithe and annumbers	described about	he the proper chi		and om das	cifed eachs	
	marked and labeled/placarded, and are in all respects in proper condition for transport accor Exporter, I certify that the contents of this consignment conform to the terms of the attacher I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a larg	ording to applic d EPA Acknowl to quantity gen	ble international and n edgment of Consent.	ational governn	nental regulations.			m the Prima	vy
ľ	Generator's/Offeror's Printed/Typed Name	1					100 	ih Day	Year
12	16. International Shipments	Export from 1		entry/exit:				1_1(_	<u> </u>
INTL	Transporter signature (for exports only):			rving U.S.:					
E	17. Transporter Actnow/edgment of Receipt of Materials       17. Transporter 1 Printed/Typed Name       Stp.j.c.       Pick Pr       Transporter 2 Printed/Typed Name	Cia	nature				Non	the Day	Year
ĮŠ	Steve Picker	1		1-16				th Day	1007
S	Transporter 2 Printed/Typed Name	1	nature	<u></u>	\		Mon	th Day	- Year
R									
lt	18. Ulscrepency								
	18a. Discrepancy Indication Space Quantity Type		Residue		🔲 Partial Reji	ection	[	Full Reje	ction
2	18b. Atternate Facility (or Generator)		Manifest Referen	ice Number:	U.S. EPAID N	lumber			
FACILI	Facility's Phone:				1				
ESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator)							nth Day	Year
80	19. Hazardous Wasta Report Management Method Codes (Le., codes for hazardous wasta treat	itment, disposa	l, and recycling systems	)		~ ~		····	
ľ	2.	3.							
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covere Printed/Typed Name		fest except as noted in it mature	tem 18a				olb Davi	Year
l		l_	In First Carlos				No		
EP	A Form 8700-22 (Rev. 3-05) Previous editions are obsolete.					G	ENERATO	R'S INITI	AL COPY

- .... . . **.** . ....

lea	e print or type. (Form desig	ned for use on elite (12-	pitch) typewriter.)			_		<u>_</u>	Form	Approved.	OMB Ng	2050-0039
	WASTE MANIFEST	1. Generator ID Number NCD	980841951	2. Page 1 of		ency Response I	-0352		15	9196	<u>50 F</u>	LE
	5. Generator's Name and Malan Special Metals V 1401 Burris Roa New ton, NC 286 Generator's Phone: 828	Velding Product d 58 -465-0352	3	1	Generalo	rs She Address (r	i dillorent ib	an mailing addras	5)			
11	6. Transporter 1 Company Nam	6						U.S. EPAID N	lamber			]
	Envirite of Ohio, 7. Transporter 2 Company Nam					·····		U.S. EPATO N	<b>20805</b>	88992-		
	r. marapater a company real											
	8. Designated Facility Name an	d Site Address						U.S. EPAID N	hunder	•		
	Envirite of Ohio. 2050 Central Av Canton, OH 447 Fecility's Phone: 800-7	renue, SE						он	D9805	68992		
	9a. 9b. U.S. DOT Description HM and Packing Group (if a		ng Name, Hazard Class, ID Nur	nber,	ŀ	10. Containe No.		11. Total Quantity	12. Unit WL/Vol.	13.1	Nasta Code	s
11	1.					<u></u>	Туре	Guariag	1113 904.			
GENERATOR	RQ, Hezardou X	; Wêsle, sold, n.o.:	s. (D005), 9 , NA3077	, pg <b>n</b>		5	DM	3275	P	-D005-		
<b>JENE</b>	2. RQ, Hazandou	s wasto, liquid, n.o.	.s. (Berlun), 9 , NA30	82, PG 1								
Ĭ	×	-				6	DM	5883	$ \mathcal{P} $	-B005-		
	3. RQ, Hazerdou	s Wasio, eolid, n.c.	s. (D005), 9 , NA3077	, PG N						-D005-		
	x		• •	-		4	DM	2245	P.	2000		
	4.											
	14. Special Handling Instruction						<u> </u>	·	1	·		<u> </u>
	A. EW Approval B. EW Approval C. EW Approval	# 10828 File Re # 10786 File Re # 10827 File Re	of. # CS6809 ERG f. # CS5574 ERG f. # CS5810 ERG	171 171 171								
	Exporter, I certify that the	arded, and are in all respect contents of this consignme	is in proper condition for transpont of contions to the terms of the a	ort according to appli trached EPA Acknow	icebie inter wiedgment	mational and natio of Consent.	onal govern	nental regulations.	ipping nam , il export si	e, and are classified and 1	ssified, pack am the Prin	taged, nery
١,		numication statement identiti	ied in 40 CFR 262.27(a) (if I am	t a side draunik Ber			n dranatà Ge	nerator) is true.		- Ma	NPE AN	
Å	Willing	Logan		Î		W/b	yr			p	7111	108
E	16. International Shipments	Import to U.S.		Export from	IU.S.	Part of en						
	Transporter signature (for exp 17. Transporter Acknowledgme		<u> </u>			Data leavi	vg U.S.:				,	
TR ANSPORTER	Transporter 1 Printed/Typed N	arne NY	•		gnature }	d I	1-1			Mor		
<b>d</b> SN	TCJ-C Transporter 2 Printed/Typed N	Pipher		I	gnature	700	12m	۸		IC	어  11	
RA A				{	-	_						
1	18. Discrepancy											
	18a: Discrepancy Indication S	Duantity	Плу	æ	Ľ	Residue		Partial Rej	jection	i	Full Re	action
					M	anifest Reference	Number;					
٤	18b. Alternate Facility (or Gan	sestor)						U.S. EPAID	Number			
FACI	Facility's Phone:		•					l				
E	18c. Signature of Atternate Fe	olity (or Generator)			·					M	onth Da	ay Year
DESIGNATED FACILITY	10 Morandaus Minute Descet	Internet Lister Code	s f.e., codes for hazardous wa	ta inadraan) dienee	al and m	·						
DESI	19. Hazeroous waste Keport	Management Meinod Code	2 Area Cones in 1978 (1973 AS	3. accusers, dispos		(כוודשפיס עיניטיי)		4.				
Ī			·									
	20. Designated Facility Owne Printed Typed Name	or Operator: Certification o	of receipt of hazardous materials		nifest exce	plas noted in iter	n 16a	$\sim$	~	11	inth De	y Year
	DAJ	LUBBR	STOPen		Ϋ́,	Jv.	) て	~	$\rightarrow$		xth De デール	510Y
Ľ				t_	$\sim$						114	

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

.

.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

.

#### Special Metals Products (SMP) Barron, Steve

Sent. Tuesday, June 09, 2009 6:00 PM Te: Burch, Breni

#### BB

#### You will be receiving all the Order Packet electronically.

It will consist of : 1-Facility Report 2-Photo Files 3-BB to Mike W. Coversheet 4-RCRIS Coversheet 5-Checklist signed by SMP 6-Attachments I, II, III covers 7-Cost work sheet Word 8-Cost work sheet Excell 9-Copies of Documents received from SMP 10-RCRA Info. and Sec of State Information 11-Order Routing Sheet 12-Violation History.

Thanks......My printer ink just ran out.....?

Thanks.....S. Barron

Stephen Barron Environmental Senior Specialist NC Department of Environment and Natural Resources Department of Waste Management 336-492-5714 610 East Center Avenue Mocresville, NC 28115

PLEASE NOTE MY NEW EMAIL, ADDRESS : Slove. Barron@NCDENR.GOV

NOTICE: It mell correspondence to and from this address may be subject to the North Caroline Public Records Lew and may be displayed to third parties by an authorized state official

TOBB VA-Fore Report Find 95me DQ V V - Photos Jeg 3/8 Covershed to 148- Cover Sheet 50 - Check hat signed by the SMP ( Attach I I I Conshe to No-Cost work Speet. 20020/ Excel 19 Copies from Dem SmP 195 - Rena dolo # See State Dufo W Order Rewting 125 Violation Hestory

# Waste Streams:

TYPE WASTE	COMMON NAME	WASTE CODE
		· · · · · · · · · · · · · · · · · · ·
	·······	
	<b>TSD Facilities:</b>	
FACILITY NAME	EPA ID #	
		, , ,
	Transporters:	
TRANSPORTER NAME	EPA ID #	
		· ·
·		
		· · · · · · · · · · · · · · · · · · ·
	<u> </u>	· · · · ·
<u>Man</u>	ifest Weights of Hazardous Waste Sh	ipments
		· · · · · · · · · · · · · · · · · · ·
		:
······································		<u> </u>
· · · · · · · · · · · · · · · · · · ·		
		· · · · · · · · · · · · · · · · · · ·
<u> </u>		, , ,
		· · · · · · · · · · · · · · · · · · ·

- Fric Report w/ photo - Photos vpag 6 Courd cheet. - Hogtwarte Conglemme Dabaforn Side A Attachin T LAngenter Report Veckhast - photon Attach It. Hulela Herry Att. III Penalty Sum worshed & Duertyat Losts 26 1002 morte to Wenter 52×2 SM MOOR to New tor 41×2 Contuole Skeet Order Pourtin

Division of Waste Management LQG INSPECTION CHECKLIST

			_Date/ Time
	-		
	C		
		ext	
INSPECTOR: PARTICIPANTS:			
PARTICIPANIS: _			
Generator Status:	Determined By: a. Statemen b. Manifests	t from:	
		ored On-site (amount):	
	for assistance only. For complete reg ot contain all NC Hazardous Waste R		eral Code of Regulations Part 260-279. l at: http://www.wastenotnc.org/
Check Manifest to determine t	the category of generator		
CESQG < 220# (1/2 di	rum) month, 2,200# Max (5 ½ dru	ms)	
SQG >220# (1/2 dr	um) month <2200 # (5 ½ drums) N	/lax 13,200# (33 drums)	
LOG >2200# (5 ½ c	lrums) month		
	sses/# Employees:	F	
Number of Dunung			
Wastes Generated			
	POTW Sewer or Septic		
		NPDES?	
······································	East		
	racin	ity Description:	

# **RCRA Site Detail**

Report run on: April 15, 2008 - 3:37 PM

NCD980841951 SPECIAL MET	ALS WE	LDING PRO	JUUCIS	S			
PA Region 04 Extract Flag: N Facili	ity Identifier	: County: CA	TAWBA		· · ·		
Universes Generator:	LQG	Transport	ier: N	Active:	Y		
Operating T	SDF:	IC In Plac	xe: N	El Indicator	(HE/GW): N/1	N	
Activity Location: NC Source Type: Other	r - B	Seq. Number: 2	2	Receive Date:	26 APR 2006	Report C	ycie: 2005
ther/Previous Site Name: SPECIAL METALS WE	LDING PROD	OUCTS	r				
Location 1401 BURRIS ROAD Address: NEWTON, NC 28658-1754			Mailing Address:	1401 BURRIS NEWTON, NC UNITED STAT	28658-1754		
Contact PersonALAN E. JONESfor Source(828) 465-0352 ext. 211nformationAJONES@SMWPC.COM		TED STATES					
Owner (current) HUNTINGTON ALLOYS From: 11/26/2003 To:	HUN	RIVERSIDE DRI TINGTON, WV 25			Type: P Phone:	rivate	
Derator (current) SPECIAL METALS WELDING PRODUCTS From: 11/26/2003 To:	NEW	I BURRIS ROAD /TON, NC 28658-' /TON	1754		Type: P Phone:	rivate	
and Type: Private Non Notifier:				ility: Unknown		Tsd Date:	
Coessibility: No. Employe		State D					
AICS Codes: 331491 Nonferrous Metal (exc	cept Copper a	nd Aluminum) Rol	ling, Drawing	g, and Extruding			
Degulated Waste Activities							
lazardous Waste Generator Status - Federal: La	rge Quantity (	Generator; State: I		STATE REGULA	TED		
lazardous Waste Generator Status - Federal: La ransfer Facility:	rge Quantity (		ties		TED Specification Use	ed Oil Burner.	
lazardous Waste Generator Status - Federal: La ransfer Facility: Dther Hazardous Waste Generator Activities Importer Activity:	 No	Used Oil Activit Used Oil Trans Transporter	t <b>ies</b> porter Activit	ly Off-			
lazardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator:	No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa	ties porter Activit r. acility:	ty Off- No Use No Use	Specification Use d Oil Fuel Market Marketer who dire	ter Activity ects shipment	
lazardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity:	 No	Used Oil Activit Used Oil Trans Transporter	ties porter Activit r: acility: essor and/or	ty Off- No Use No I	Specification Use d Oil Fuel Market	ter Activity ects shipment used oil to	
Iazardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity:	No No No	Used OII Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor:	ties porter Activit r: acility: essor and/or	ty Off- No Use No I	Specification Use d Oil Fuel Market Marketer who diro off-specification u off-specification u	ter Activity ects shipment used oil to used oil burner:	1
lazardous Waste Generator Status - Federal: La ransfer Facility: other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: Recycler Activity:	No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ	ties porter Activit r: acility: essor and/or	ty Off- No Use No I	Specification Use d Oil Fuel Market Marketer who dirr off-specification u	ter Activity ects shipment used oil to used oil burner: st claims the use	1
Mixed Waste Generator: Transporter Activity: TSD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who diro off-specification u off-specification u Marketer who firs	ter Activity ects shipment used oil to used oil burner: st claims the use cifications:	d
Azardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner:	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No De	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs oil meets the spe stination Facility	ter Activity ects shipment used oil to used oil burner: st claims the use cifications:	d
Iazardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated	d Accumulate Managed
Iazardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: Recycler Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description Latteries	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N	d Accumulated Managed N
lazardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: SD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description latteries amps resticides	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N N N	d Accumulated Managed N N N
lazardous Waste Generator Status - Federal: La ransfer Facility: other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: SD Activity: Recycler Activity: Scempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description latteries amps resticides	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N	d Accumulated Managed N
lazardous Waste Generator Status - Federal: La ransfer Facility: Ther Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: tecycler Activity: tecycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description latteries amps vesticides lercury containing equipment Vescription of Hazardous Wastes (as reported on S	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground Injection Control:	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N N N	d Accumulated Managed N N N
lazardous Waste Generator Status - Federal: La ransfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: SD Activity: Recycler Activity: Recycler Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description latteries amps	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground Injection Control:	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N N N	d Accumulated Managed N N N
azardous Waste Generator Status - Federal: La ransfer Facility: ther Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: SD Activity: tecycler Activity: Execycler Activity	No No No No No	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground Injection Control:	tles porter Activit r: acility: essor and/or vity	ty Off- No Use No I No I No I	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N N N	d Accumulated Managed N N N
azardous Waste Generator Status - Federal: La ransfer Facility: Ther Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: SD Activity: tecycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description atteries amps esticides lercury containing equipment Description of Hazardous Wastes (as reported on S PA Waste Codes: D005 Biennial Report Information No Biennial Report detail information available.	No No No No No Site Identificat	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground Injection Control:	tles porter Activit r: acility: essor and/or vity	ty Off-No Use	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs bil meets the spe stination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N N N N	d Accumulated Managed N N N
lazardous Waste Generator Status - Federal: La ransfer Facility: Ther Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: ransporter Activity: SD Activity: SD Activity: tecycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Universal Waste Activities: Description tatteries amps resticides tercury containing equipment Description of Hazardous Wastes (as reported on S PA Waste Codes: D005 Blennial Report Information No Biennial Report detail information available.	No No No No No Site Identificat	Used Oil Activit Used Oil Trans Transporter Transfer Fa Used Oil Proce Re-refiner Activ Processor: Refiner: Underground Injection Control:	tles porter Activit r: acility: essor and/or vity	ty Off-No Use	Specification Use d Oil Fuel Market Marketer who dire off-specification u off-specification u Marketer who firs oil meets the spe istination Facility iversal Waste:	ter Activity ects shipment used oil to used oil burner: st claims the use cifications: for Generated N N N N	d Accumulated Managed N N N N N

North Carolina Secretary of State

#### Page 1 of 1



#### CORPORATIONS

**Corporations Home** Search By Corporate Name Search For New Corporation Search By Registered Agent Important Notice Corporations FAQ Homeowners' Association FAQ Tobacco Manufacturers **Dissolution Reports** Non-Profit Reports Verify Certification **Online Annual Reports** 

#### LINKS & LEGISLATION

KBBE B2B Annual Reports
SOSID Number Correction
2001 Bill Summaries
1999 Senate Bills
Annual Reports 1997
Corporations 1997
Register for E-Procurement
Dept. of Revenue

#### ONLINE ORDERS

Start An Order New Payment Procedures CONTACT US **Corporations** Division Secretary of State's web site TOOLS Secretary of State Home Secretary of State Site Printable Page

### North Carolina

### DEPARTMENT OF THE Elaine F. Marshall SECRETARY OF STATE

PO Box 29622 Raleigh, NC 27626-0622 (919)807-2000

#### Date: 4/15/2008

### Click here to:

Secretary

View Document Filings | Sign Up for E-Notifications | Print apre-populated Annual Report Form | Annual Report Count | File an Annual Report |

#### **Corporation Names**

Name	Name Type
NC Huntington Alloys Corporation	Legal
NC Inco Alloys International, Inc.	Prev Legal

**Business Corporation Information** 

SOSID:	0073365
Status:	Current-Active
Date Formed:	6/27/1984
Citizenship:	Foreign
State of Inc.:	DE
Duration:	Perpetual

#### **Registered Agent**

Agent Name:	CT Corporation System
Registered Office Address:	225 Hillsborough Street Raleigh NC 27603
Registered Mailing Address:	225 Hillsborough Street Raleigh NC 27603
Principal Office Address:	3200 Riverside Dr Huntington WV 25705-1737
Principal Mailing Address:	3200 Riverside Dr Huntington WV 25705-1771
Stock	

е Мар	Class	Shares	No Par Value	Par Value	
	99 SEE CERT	0		0	

For questions or comments about the Secretary of State's web site, please send e-mail to Webmaster.

	$\langle \rangle$	X du A A
Company Name: _	Der	What P
EFA ID Namber:	- 0	L
Date: 5 PM	ny og	
Required Records/	Document Cha	This Laby

VERLING WAR INGRESS VS A LANGE GUTANTITE GONERATOR 72,200 #/month.

The generator must provide and make available, but not limited to, any persons knowledgeable of your HW management program and the following records/decuments at the time of inspection:

M. Records of weekly inspection of containers stored in designated Hazardous Waste Storage Areas.

2. Neurois of daily inspection uttanks containing hazardous waster

- 3. Records of weekly inspection of skip pade (and after storms).
- 1/4. Job titles for each position related to humidous waste management and the name of the employee filling cuch job.

1.5. Job description of positions related to hozordous waste accongement. WIGS we, Somer-

- V6. Written description of type and amount of introductory and continuing training that will be given to each hazardous waste management position.
- 1/7. Records of annual or introductory batardous waste training for each amployee managing hazardous waste. Mussime, Server .

Von copies of signed hazardous waste multicsts. Wilso Ing Some .

- 1/2. Copy of band ban notification for each hazardous waste transported from facility.
- 10. Copy of latost facility contingency plan. NETE UPSATES (A JONES)

1/1. Copy of Blennial Report.

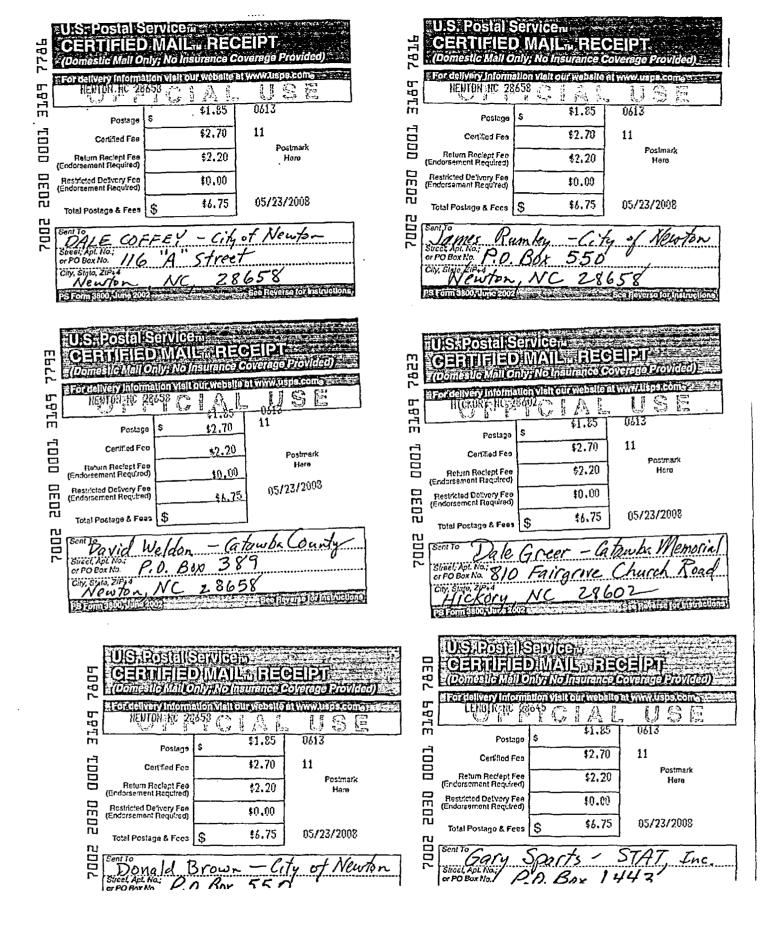
22. Copy of written, description or other type of Waste Minimization Plan.

I milentypidge or corflix that the noise records/documents were requested and that all contribucurrently craffable, and since correspond of these records were made available at the time of the inspection.

GO stighting

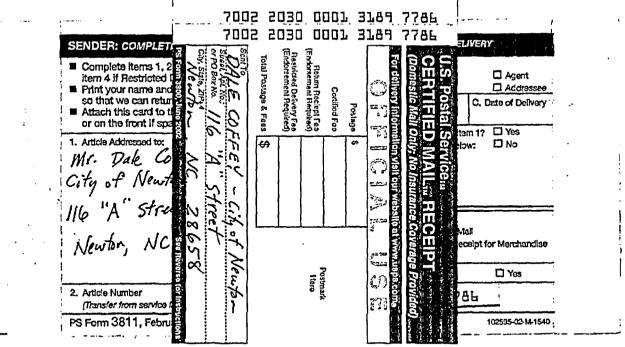
Hacility Contest or Depresentation

managed bate



7661		D MAIL <sub>tu</sub> RE	Coverage Provided)
Ē	* For delivery inform	ation visit our website	at www.usps.coma
31.89	HOOKESVIELE	719 28115 7 28 1	E 21 (177) 207.2
Ч	<u> </u>	1 45 8 5 1 1	USE
	Postage	s \$1.85	0613
רמסמ	Centified Fee	\$2.70	11
	Return Reciept Fee (Endorsement Required)	\$2.20	Posimark Hero
2030	Restricted Delivery Feo (Endorsement Required)	40.00	
កា កា	Total Postage & Fees	\$ \$6.75	05/23/2003
200	Sent Jo Stephen Da Silvey Act. No. or PO Box No. City, Sista ZiA-4 MOORES VII MOORES VII ISTRACTOR ON MARCON	Fron - NCDEL East Center LLE, NC 28	VR - Haz Uhste r. Avenue 115





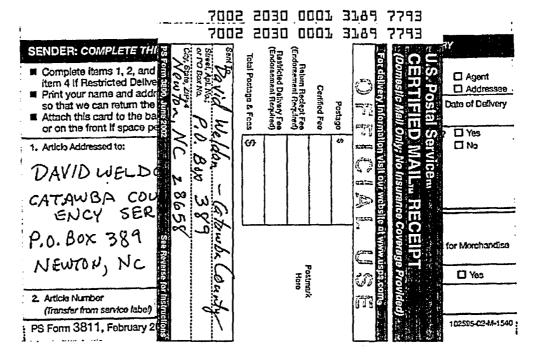


1401 Burris Rd., Newton, North Carolina 28658 Welding Electrodes • Filler Metals • Flux-Cored Wires • Fluxes

MR. DALE COFFEY City of Newton Fire Marshall 116 "A" STREET NEWTON NC 2,8658 INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®

and the second second





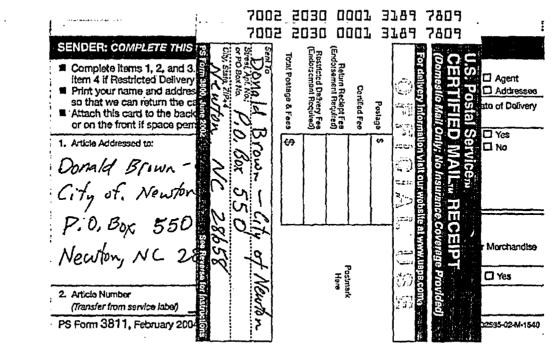


1401 Burris Rd., Newton, North Carolina 28658 Welding Electrodes • Filler Metals • Flux-Cored Wires • Fluxes

MR. DAVID WELDON CATAWBA COUNTY EMERGENCY SUCS. P.O. BOX 389 NEWTON, NC 28658 INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®

1997年1月1日日本市内的基本







1401 Burris Rd., Newton, North Carolina 28658 Welding Electrodes • Filler Metals • Flux-Cored Wires • Fluxes

MR. DONALD BROWN City of Newton Police Department P.D. Box 550 Newton, NC 28658

INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®



, I	007 107		01 3189 01 3189		
SENDER: COMPLETE TH Complete Items 1, 2, and Item 4 if Restricted Delive Print your name and add so that we can return th Attach this card to the b or on the front if space if 1. Article Addressed to: James Rumley Cify of New Waste water True Did, Box 55 Newton, NC 2. Article Number (Itansfer from service labour) PS Form 3811, February	and the Runky - City of Merotos one way P. O. Box 5.50	Flaturn Recipt Fee     Fostmark       Restricted Defivery Fee     Hare       (Endorsement Required)     Hare       Total Postage & Feez     \$	Poslege S Certited Fee	U.S. Postal Servicen CERTIFIED MAIL <sub>IN</sub> RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) For delivery information visit our viobatic at write uses conv	Agent         Addressee         Oate of Delivery         Pres         No         It for Merchandise         Yes         102596-02-M-1540 ·



and the second second

Mr. James Rumley City of Newton Wastewater Treatmost Plant P.O. Box 550 Newton, NC, 28658 INCONEL, MONEL, NI-ROD, INCOLOY, NIMONIC, INCO-WELD, INCOFLUX, NILO



SENDER: COMPLETE THIS SECTIO	0.9	7002		םפס קרים קרים	000 7	11. 3	169	7623 GOC
<ul> <li>Complete items 1, 2, and 3. Also collision item 4 if Restricted Delivery is desired</li> <li>Print your name and address on the so that we can return the card to you</li> <li>Attach this card to the back of the main or on the front if space permits.</li> </ul>	018. wrag	The Dale	Total Postage & Feet	Restricted Dolivery Fee Endorsement Required)	Return Reclept Fee		r delivery informa	al S I.S. Postal S ERTIFIED Iomestic Mall O
1. Article Addressed to: Dale Green	Failgrin	greer -	÷			( so	F F C I A L.	ervice <sub>1</sub> » ) MAIL <sub>1</sub> F
Dale Greer Catamba Memorial Hos 8/0 Fairgrove Church Hickory, NC 2860	e Chun	abuba	Ĺ	Ĺ	· ]	<u> </u>	1 3	ECEIPT
2. Article Number (Transfer from service label)	A Ro	Meno			Postmark Here		Nuclear Section	Provided)



Mr. Dale Greer Catawba Memorial Hospital 810 Fairgrove Church Road Hickory, NC 28602 INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®



	)	i • •	7007 7007	'-	)30 130	0001 0001			7830 7830	i
	SENDER: COMPLETE THIS SE Complete items 1, 2, and 3. Alitem 4 if Restricted Delivery is Print your name and address of so that we can return the card Attach this card to the back of or on the front if space permits 1. Article Addressed to: Gary Sparts STAT Two	r, Siene, 21944 Lerr Di C. Form 3800, Juno 2002	Start ADIA SPARTS	Total Postage & Fees	Resulcted Dalivery Fee (Endorremant Required)	Centified Fas Return Recipt Fas (Endorsement Required)	Postage S	For delivery information visit our website at $\bigcirc F F \downarrow C \downarrow A \downarrow$ .	U.S. Postal Service ** CERTIFIED MAIL*** R (Domestic Mail Only; No Insuran	Agent Addressee of Delivery Yes No
~	Gary Sparts STAT, Ive P.O.Bon 1443 Lendir, NC 28 2. Article Number Manster from service tebel PS Form 3811, February 2004	28645 Sco Reverso for Instructions	STAT Inc.			Postmark		site at www.usps.coms	ECEIPT ce Coverage Provided)	erchandise Yes

• !

:



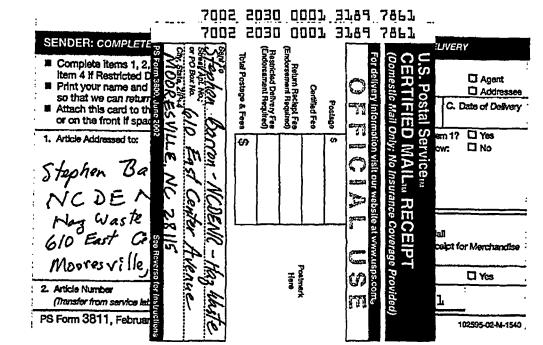
Welding Products Company 1401 Burris Rd., Newton, North Carolina 28658 Welding Electrodes • Filler Metals • Flux-Cored Wires • Fluxes

Mr. Gary Sparts STAT, Inc. P.O. Box 1443 Lenoir, NC 28645

INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®

and and the state of the state







Welding Products Company 1401 Burris Rd., Newton, North Carolina 28658 Welding Electrodes • Filler Metals • Flux-Cored Wires • Fluxes

Mr. Stephen Barron NCDENR - Nay Waste Section 610 East Center A Venue Modresville, NC 28115 INCONEL, MONEL, NI-ROD, INCOLOY, NIMONIC, INCO-WELD, INCOFLUX, NILO



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Beverly Eaves Perdue Governor Dexter R. Matthews Director Dee Freeman Secretary

## **HAZARDOUS WASTE SECTION**

June 9, 2009

To: Mike Williford Compliance Branch Head Hazardous Waste Section

From: Brent Burch Western Compliance Supervisor

Subject: Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 Catawba County, NC NCD 980 841 951 Large Quantity Generator

Attached for your review, comments and transmittal is an enforcement package for the subject facility. The findings of this investigation were identified during a Compliance Evaluation Inspection conducted at the subject facility on May 13, 2009.

Based on the findings of this inspection, Special Metals Welding Products has been identified as a Significant Non-Complier (SNC) following guidance of the State of North Carolina, Hazardous Waste Section Compliance and Enforcement Strategy.

If additional information is needed please advise.

Brent Burch Date Western Compliance Supervisor

cc: S. Barron Central Files

> 610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

Integrated Contingency Plan

# 2. Notification

# 2.1 Emergency Coordinators

The primary Environmental Emergency Coordinator is:

Steve Winnell 3641, 7<sup>th</sup> St. NE Hickory, NC 28601 (828) 324-1988

The Alternate Environmental Emergency Coordinators are:

1<sup>st</sup> Alternate

Alan Jones 138 Paradise Lane Kings Mountain, NC 28086 704-739-9964

2<sup>nd</sup> Alternate

3<sup>rd</sup> Alternate

Jeannie Martin 1757 Castlewood Ct. Hickory, NC 28602 (828)-294-3408

Tom Dickerson 、 335 Holland Drive Statesville, NC 28677

704-872-4292

# When contacting an Emergency Coordinator:

- Attempt to notify a person who is in the plant first, using the order above.
- If none of the Coordinators are in the plant, contact one of the Coordinators at their home, following the order in the above list
- The Emergency Coordinator or Alternate can deputize other Company employees to assist them in the event of an emergency.
- The Emergency Coordinator or Alternate can commit the Equipment and resources needed to deal with an emergency.

Burny 09 13 mmy 09

### Outline for RCRA Training

## RCRA TRAINING ATTENDANCE ROSTER

DATE:

TRAINER: \_\_\_\_

TOPICS COVERED:

- 1. Sources of Hazardous Waste.
- 2. North Carolina and United States law covering hazardous waste.
- 3. Definitions of generator, labeling, accumulation, etc.
- 4. No more than 55 gallons of waste stored at each satellite accumulation area.
- 5. Use of secondary containment for storage.
- 6. Manifest/shipping documents are required.
- 7. Weekly inspections are required; know what to look for.
- 8. There are penalties for non-compliance.
- 9. We have a Contingency Plan for emergencies.
- 10. We have a Building Evacuation Alarm system.
- 11. We have a Slug Spill Procedure to follow if any oil or chemical enters the sewer system.

### ATTENDANCE ROSTER

PRINT NAME	SIGNATURE	JOB ASSIGNMENT
Chris Rafield	Chris Porfield	Flectrode
Devin Daniels	Dari Dendy	Electrode
Joshua M. Grindstaff	Cohua M. Guntatel	Electrode
Joshuk Farley	Roshna Jaley	Electrode
R.L. CATOE	A.L. Cito	Privicess
Willie Logm	A kgr	Prodution
5 horst Miswerry	Shere PMAnney	Production
Shannon Lail	Sham Sui	Electrode
Buit Propst	Burd Propos	Electrode
· · · · · · · · · · · · · · · · · · ·		

RCRA training outline.doc 4/20/2006

5/27/08

44

## Outline for RCRA Training

# RCRA TRAINING ATTENDANCE ROSTER

DATE:

5/27/0

TRAINER:

TOPICS COVERED:

- 1. Sources of Hazardous Waste.
- 2. North Carolina and United States law covering hazardous waste.
- 3. Definitions of generator, labeling, accumulation, etc.
- 4. No more than 55 gallons of waste stored at each satellite accumulation area.
- 5. Use of secondary containment for storage.
- 6. Manifest/shipping documents are required.
- 7. Weekly inspections are required; know what to look for.
- 8. There are penalties for non-compliance.
- 9. We have a Contingency Plan for emergencies.
- 10. We have a Building Evacuation Alarm system.
- 11. We have a Slug Spill Procedure to follow if any oil or chemical enters the sewer system.

#### ATTENDANCE ROSTER

PRINT NAME	SIGNATURE	JOB ASSIGNMENT
EARIM Monpson ( JEMANie Martin	En Ston Ste	TO pertol
JEMANie Martin	Domie Martin	Mar. AR-admin Service
Khai Yang (	ANY: 76 -	Maistenance
RUBERT LAWSON	MARCO)	MAINT
·		
	1	
	· · · · · · · · · · · · · · · · · · ·	
•		

RCRA training outline.doc 4/20/2006

## Alan Jones

From: Alan Jones

Sent: Friday, May 23, 2008 5:04 PM

To: Willie Logan; Gary Beaird; Bobby Catoe; Steve Winnell; Tom Dickerson; Jeannie Martin; Don Hildebran; Shane P. McSweeney; Shannon Lail; Ying Cha; Pheng N. Yang; Kenneth Church; Willie Gibson

Subject: Annual RCRA Training

RCRA (Resource Conservation and Recovery Act)/HAZWOPER (Hazardous Waste Operator) Training

#### Every person

- who contacts or creates hazardous waste as a part of their normal assignment,
- who may handle hazardous waste as a part of a clean-up effort,
- who may act as an Emergency Coordinator,
- · who may handle shipments of hazardous waste,
- who is a supervisor of a person in one of these roles

... is required to have RCRA training annually.

This year's training is scheduled for 2:00 PM on Wednesday, May 28. It will last approximately 1 hour.

The following personnel need to attend:

Steve Winnell	(Emergency Coordinator)
Tom Dickerson	(Emergency Coordinator)
Jeannie Martin	(Emergency Coordinator)

✓ Bobby Catoe

Willie Logan

- ✓ Earl Thompson
- Charlie Bass
- Shane McSweeney
- ✓ Chris Rayfield Charlie Stringfield John Hester
- Billy Propst
   Cher Kevin Lee
- -David-Lawson-
- -Ying Yang-

Shannon Lail Ying Cha Chong Vang Pheng Yang <del>Kenny Church</del>

Terry Herman -Willie Glbson Lou Cha

Gary Beaird Gary Anderson Robert Lawson Don Hildebran

🗸 Khai Yang

Supervisors and group leaders: Please communicate this info to people who do not have e-mail, and anyone that is new in your group that should also be on this list.

**Outline for RCRA Training** 

•

## **RCRA Training Test**

Print Name: R.L. CATOE Signature: R.C. C.D. Date: 5/28/08

Circle the correct answers.

- 1. When are hazardous waste drums required to have a "Hazardous Waste" label on them?
  - a. After they are full.
  - (b.) As soon as any amount of hazardous waste is placed in the drum.
  - c. After the drum is  $\frac{1}{2}$  full.
  - d. At the end of the shift.
- 2. How long are we allowed to hold full drums of hazardous waste at this facility?
  - a. 180 days.
  - b. 15 days.
  - © 90 days.
  - d. 365 days
- 3. When do you mark the "Accumulation Start Date" on the drum?
  - a. When the label is first placed on the drum.
  - (b.) When the drum is full and getting moved to the accumulation area.
  - c. When the drum is being shipped out.
  - d. After the drum reaches the disposal facility.
- 4. You can store two 55-gallon drums of the same type of waste side-by-side until they are both full.

True or False

- 5. How often are we required to inspect our hazardous waste accumulation areas?
  - a. Monthly
  - b. Daily
  - C Weekly
  - d. Hourly
- 6. Pick (3) of the hazardous waste sources at this facility
  - (a) Ink containing Methyl Ethyl Ketone.
  - (b.) Baghouse dust containing barium.
  - High pressure sodium light bulbs.
  - d. Used oil.
  - e. Spent alkaline cleaner.
  - f. Ink from the electrode printing and packing line.
  - (g) Flux containing barium.
  - h. Used cartridges from laser printers.
- 7. What is the maximum quantity of hazardous waste that you can accumulate at each Satellite Accumulation Area (SAA)?
  - a. 30 gallons
  - b. 1 gallon
  - c. (55)gallons
- 8. You can leave the top off of the drum until it is full.

True o(False)

**Outline for RCRA Training** 

## RCRA Training Test

Print Name: Willie Logn Signature: Plan

\_\_\_ Date: <u>5/28</u>/08

Circle the correct answers.

- 1. When are hazardous waste drums required to have a "Hazardous Waste" label on them?
  - a. After they are full.
  - (b.) As soon as any amount of hazardous waste is placed in the drum.
  - c. After the drum is  $\frac{1}{2}$  full.
  - d. At the end of the shift.
- 2. How long are we allowed to hold full drums of hazardous waste at this facility?
  - a. 180 days.
  - b. 15 days.
  - (c) 90 days.
  - d. 365 days
- 3. When do you mark the "Accumulation Start Date" on the drum?

  - a. When the label is first placed on the drum. When the drum is full and getting moved to the accumulation area.
  - c. When the drum is being shipped out.
  - d. After the drum reaches the disposal facility.
- 4. You can store two 55-gallon drums of the same type of waste side-by-side until they are both,full.

(True) (False)

- 5. How often are we required to inspect our hazardous waste accumulation areas?
  - a. Monthly
  - b. Daily
  - (c) Weekly
  - d. Hourly
- 6. Pick (3) of the hazardous waste sources at this facility
  - (a) Ink containing Methyl Ethyl Ketone.
  - (b) Baghouse dust containing barium.
  - W High pressure sodium light bulbs.
  - d. Used oil.
  - e. Spent alkaline cleaner.
  - f. Ink from the electrode printing and packing line.
  - $\widehat{g}$ .) Flux containing barium.
  - h. Used cartridges from laser printers.
- 7. What is the maximum quantity of hazardous waste that you can accumulate at each Satellite Accumulation Area (SAA)?
  - a. 30 gallons
  - b. 1 gallon
  - $\overline{(c)}$  55 gallons
- 8. You can leave the top off of the drum until it is full.

True or/Ealse

	United States Environmental Protection Agency
--	---

#### **Evaluation List**



25 Evaluation(s) found.

SPECIAL METALS WELDING PRODUCTS	NEWTON	NCD980841951
EPA Unaddressed SNC: N	EPA Addressed SNC: N	EPA SNC with Compliance Schedule Established: N
State Unaddressed SNC: N	State Addressed SNC: N	State SNC with Compliance Schedule Established: N

#### Add New Evaluation Show All Violations

							Page: 1		Go To
	Evaluations					Violations			
	Act Loc	Identifier	▲ Type	▲ Date ▼	Agency	Resp Person	Evaluation Desc	Count	
1	NC	016	CSE	05/27/2008	S	NC031	COMPLIANCE SCHEDULE EVALUATION		No violations found.
2	NC	016	CEI	04/21/2008	S	NC031	COMPLIANCE EVALUATION INSPECTION ON-SITE	1	Show Violations
3	NC	015	CSE	05/02/2006	S	NC049	COMPLIANCE SCHEDULE EVALUATION		No violations found.
4	NC	015	CEI	04/12/2006	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE	1	Show Violations 26
5	NC	014	CEI	04/16/2004	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
6	NC	021	CEI	02/06/2002	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
7	NC	013	CEI	06/07/2000	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
8	NC	012	CSE	09/16/1998	S	NC049	COMPLIANCE SCHEDULE EVALUATION		No violations found.
9	NC	012	CEI	08/12/1998	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE	1	Show Violations
10	NC	011	CSE	06/24/1996	S	NC049	COMPLIANCE SCHEDULE EVALUATION		No violations found.
11	NC	APT	CEI	03/27/1996	E	R4DDA	COMPLIANCE EVALUATION INSPECTION ON-SITE	2	Show Violations
12	NC	010	CEI	09/01/1995	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
13	NC	009	CEI	09/08/1993	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
14	NC	008	NRR	04/12/1993	S	NC022	NON-FINANCIAL RECORD REVIEW	1	Show Violations
15	NC	800	CSE	03/22/1993	S	NC058	COMPLIANCE SCHEDULE EVALUATION		No violations found.
16	NC	007	CEI	08/04/1992	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
17	NC	000	CEI	09/12/1991	S	NC049	COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
18	NC	042	CSE	12/11/1990	S	NC049	COMPLIANCE SCHEDULE EVALUATION		No violations found.
19	NC	000	CSE	09/18/1990	S	NC049	COMPLIANCE SCHEDULE EVALUATION	1	Show Violations
20	NC	006	CEI	09/18/1990	S		COMPLIANCE EVALUATION INSPECTION ON-SITE	1	Show Violations
21	NC	005	CEI	08/31/1989	S		COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
22	NC	004	CEI	09/14/1988	S		COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
23	NC	003	CEI	09/15/1987	S		COMPLIANCE EVALUATION INSPECTION ON-SITE		No violations found.
24	NC	002	CSE	07/24/1985	S		COMPLIANCE SCHEDULE EVALUATION		No violations found.

#### EPA ID Number: NCD 980 841 951

1

Sacility Name: S <sub>l</sub>		City: Newton			
		<u> </u>	· · · · · · · · · · · · · · · · · · ·		
	<b>Mo./Day/Yr.</b> 5/13/2009	Type:CEI/CSE/ CEI			
nspector ID #: 031	Reason:	<u>01</u>			
Content of the second s	one)	C 5NY/SNN evaluation	can atso be submit		
no longer a SNC	(SNN eval.)				<del>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</del>
YES / NO CSE ( Waste Vo	the state of the s	ure Distance to	Number of	Distance	Distance
Involved		ia . Residences		to On-site Wells	10
i Type: GPT	Date De	termined : 5/13/20	09	Cia	ass:
riority: Branc	h: 01 F				

Return to Compliance

SR

\*Scheduled\* \*Actual\* Reg. Description: 40 CFR 262.34(a) (1) (i)

Comment:

Reg. Type:

# 40 CFR 262.34 (a) (4)

.

Teo millo mae

inninin sector i filtre

*Actual*	*belubed*	_
		Return to Compliance:
	Person: 031	Priority:Branch:1
	Date Determined: 5/1	#5 Type: GPT
		•
40 CFR 265.16 (d)(2)		
( <b>t</b> ) ( <b>r</b> ) <b>t</b> 2.262.34		
*lsubar* anaryonary	v i titru ≰pəjnpəqis;	
*10000 ¥		Зопинато со приматес:
	Person: 031	Priority:Branch:1
	Date Determined: 5/	#4 Type: GPT
		ຼີ ວມເມແອນ:
40 CLK 562.34(a) (4)		
senderou:	wa filiwa	The set of the
*lsut>A*	*bəlubədə*	-
		SomeliqueO of muteX
	Person: 031	Priority:Branch: I
6002/5	Date Determined: 5/1	#3 Type: GPT
40 CFR 265.173		
(1) (1) (8)#6.202 NAC 0F mongroso(	l iğoN	
		Reg. Type: 5 <u>R</u>
		k l
*Actual*	*bəlubədə2'	Return to Compliance:
*Actual*	Person: <u>031</u> 'Scheduled*	

•

Comment:

#6	Турс:	GPT	Date Determine	cd: :	5/13/2009		Class:
Priorit	y:	Branch:1	Person: <u>031</u>				
	Return	to Compliance	*Scheduled*		*Actual*		
Rcg. T	Type: <u>SR</u>	<u>.</u>	I	Reg.	Description:		
Comm	ient:		40 C I		72.44 (a) (4) CFR 265.35 15A NCAC 13A .(	)110(c)	
#7	Туре:	GPT	Date Determine	ed:	5/13/2009	<u> </u>	Class:
Priorit	y:	Branch:1	Person: <u>031</u>				
	Return	to Compliance	: *Scheduled*		*Actual*		
keg. 1 Comm	ype: ar ient:		1	تتر مرج ۱۳۰۶ ع	Desemption: 40 CFR 262.34 (a) 40 CFR 26		
#8	Турс:	GPT	Date Determin	od: 5	/13/2009		Class:
Priorit	y:	Branch:1	Person: <u>031</u>				
	Return	to Compliance	*Scheduled*		*Actual*		
neg. 1	.ypv. <u>38</u>	-	<u>-</u>		Losenpron CFR 262.34 (c) (1)		
							······································
<del>#</del> 9	Турс:	GPT	Date Determine	ed: :	5/13/2009	(	Class:
Priorit	y:	Branch:1	Person: <u>031</u>				

Return to Compliance:

\*Scheduled\*

neg. 13pe. <u>an</u>

\*Actual\* reg. Desemption. 40 CFR 262.42 (a) (2)

Comment:

•

~

## **VIOLATION HISTORY**

1

# NCD 980 841 951

Inspection Date	Type of Inspection	NO	V Issue Date/#	<b>Violations</b>
3/13/2002	соприяное пуананон в	uspector	<u>:</u>	
	Regulatio	ons Viola	ted:	
	-	i	40 CFR 262	.34(a) (1) (i)
		2	40 CFK 262	34(n)(1)(i)
				FR 265.173
		2	to life 404.	24(3)(4)
			40 Ci	FR 265.16(c)
		1	10 L F R 202	an (a) (1)
			40 C	FR 265.16 (d)(2)
		÷.	40 CKR 202.	34 (a) (4)
			40 C	FR 265.31
		6	40 CFR 262.	34 (n) (4)
			40 Ci	FR 265.35
			15A NCAC	13A .0110(c)
		1	40 k f R 202.	24 (a) (1)
				FR 265.54 (d)
		8	40 CFR 262.	34 (c) (1)
		9	40 CFR 262.	.42 (a) (2)

### **VIOLATION HISTORY**

### ICD 380 841 321

\* • •

~	v	 ~~~	بعاد فيناهما الا	
 	≘	 _ <b>1</b>		

snoimloiV oM	noirooqs	ni bəlubənəz əənsilqmoD	2/51/5008
SHORIMOLA	MANNA ANSSE A ANS	uomaadsur to add f	anna nanaadam

1- 40 CFR 265.37 Fail to make arrangements with local authorities					
	«/n-9nn7// x.mst.t	соприаное тулияной икресной	0667/17/1		

1001 # 1011	Compliance Evaluation Inspection I- 40 CFR 262.334 (a) (4)77777	4/15/5006
snoitsloiV oN	noirooqani bolubodo2 oonailqmoD	9007/70/9

snoinsloiV oM

4/16/2004 Compliance Evaluation Inspection

1

Screcord=1



**Violation List** 



S. 199.105.191 S.S.		
tina faante t	President Protection	t r t t t
2.2 Forest Forest	コースパンター おくしょう	r a s e i l

**Show All Evaluations** 

**Show All Enforcements** 

							Go To						
									i i s		2 I ( X (		
	n 1 K	*										1 di Li	
	t t		<u>265.C</u>	8 ] x 2 €		8	( * 1 ( - E		1 = 1 ()		Show Evaluations	2	Show Enforcements
			<u>262.C</u>	1. j. k. j. k.		ł	10 x 0 1 F	k. V		<i>E</i>	Show Evaluations	5	Show Enforcements
	1		<u>262.A</u>	t r € t		ą	( n. ( 1				Show Evaluations	2	Show Enforcements
	t C		<u>262.A</u>	8 (1 n () . R		i.	2 x 2 * - 1				Show Evaluations	2	Show Enforcements
	1 č		<u>262.A</u>	( ( ) ) (		į.	2 - 2 - 3				Show Evaluations	2	Show Enforcements
	ι:		<u>262.A</u>	2 ] a ∦ a		ġ.	C ≠ T ≤ E	e T			Show Evaluations	2	Show Enforcements
	1.;		<u>262.A</u>	1 1 a († a		į.	1 x * * 1	-		1	Show Evaluations	2	Show Enforcements
	1.5		<u>262.A</u>	1. j. v. (1. s.		i	2. x → 2 = 4.				Show Evaluations	2	Show Enforcements



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue Governor Division of Waste Management Dexter R. Matthews Director

Dee Freeman Secretary

#### HAZARDOUS WASTE SECTION

#### FACILITY INSPECTION REPORT

May 28, 2009

- 1. <u>Facility Information</u>: Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 NCD 980 841 951, Large Quantity Generator
- 2. Facility Contact: Hewitt Linyard
- 3. <u>Survey Participants</u>: Hewitt Linyard, Bobby Catoe, Sean Morris, Stephen Barron
- 4. Date of Inspection: May 13, 2009
- 5. Purpose of Inspection: To determine compliance with 40 CFR 260-279

#### 6. Facility Description:

- The facility manufactures welding rods and products.
- There are approximately 75 employees at this facility.
- The nearest private residence is approximately 500 yards from the facility.
- The facility is on city water and sewer. They have a NPDES permit.
- The facility consists of one manufacturing building.
- The facility was last inspected on 16APRIL08, and received a Ticket Notice of Violation Docket # 2008-079. The prior inspection on 12APRIL06, also resulted in a Notice of Violation being issued.
- The facility personnel agreed that the facility was to be inspected as a Large Quantity Generator.
- Average hazardous waste generation for the last month of May 13, 2009 was about 7,251 lbs.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

Page 1

	Special Metals W	aste Genera	tions Calculation:	1 S	+				
	Waste shipments (	005 Barium D	rummed Hazardous	Waste					
4/7/2009	Shipped			12 Drums	8,585 lbs.	or 715#/Dr	um		
5/13/2009									
5/1 3/2009	In Inventory Dur <90 Storage and			5 Drums	3,575 lbs.	@715 #/Dru	m		
	Plus Beghouse			3 Drums	1074 bs.		ull or 358#/Drur	n	
	Plus on the grou	<u>_</u>			2 lbs.	estimate			<u></u> _
	Plus 6 Satellitte In Facility	Accumulation	Drums		100 lbs.	estimate			
	Plus Weste D00	5 in Sludge Pi	L		2,500 lbs.		ased on last ye ste genertated		
							th one year's v		
			7,251 lbs. ever	age monthly	generation to	r month ending	May 13, 2009		

#### 7. Waste Type:

- The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste annually. The facility generates about 5 drums per month of Barium waste or about 3,575 lbs. of drummed waste per month, plus baghouse generation. Annual shipment of sludge from the water treatment pit generates about 2,500 lbs. per month.
- They ship in 55 gal drum containers and occasional metal roll off containers.

#### 8. Areas of Inspection:

- <u>Manifests</u>
  - Manifests where inspected. The facility had difficulty supplying all manifests. Manifest management was not adequate.
    - Signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste. Facility personnel could not explain why there were two manifest documents for the same shipment.
    - Land Disposal Restrictions included.
    - The manifests inspected were completed correctly.
    - Drummed hazardous waste shipments are made approximately every three month. Metal roll offs are shipped annually.
  - o Transporter: Envirite of Ohio OHD 980 568 992
  - o TSD: Envirite of Ohio OHD 980 568 992

- Weekly Inspections
  - o Weekly inspections documents were reviewed.
  - o Inspections are being performed and documented correctly.
- <u>Training</u>
  - Not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and both do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. Both Steve Winnell and Tom Dickerson have been in the position of environmental emergency coordinators at least since May 22, 2008 through the present.
  - Employee job descriptions for the employees handling hazardous waste are not documented and could not be provided by Hewitt Linyard. Job descriptions for hazardous waste management is not documented for Hewitt Linyard (signed hazardous waste manifest 1990976), Bobby Catoe (signed hazardous waste manifest 1993147), and Willie Logan (signed hazardous waste manifest 1992740).
  - Hazardous waste annual training of other employees is taking place. Last training date was 27MAY08.
- Emergency Preparedness
  - The facility has system for notification of employees in the case of a fire or emergency.
  - o Emergency equipment is mapped and maintained.
  - o There has not been a major emergency at this facility.
  - The facility has only limited internal emergency response capabilities, and relies heavily on outside emergency response agencies.
  - o ADT completes monthly fire sprinkler inspections.
  - Fire extinguishers are checked monthly.
  - Key employees carry radios and/or cell phones.
- <u>Contingency Plan</u>
  - The facility had completed and documented arrangements with local emergency authorities to include Fire Marshall, Catawba County Emergency Services, Newton Police, Newton POTW, Catawba Memorial Hospital, and STAT Inc.
  - Their Contingency Plan was located on site.
  - Emergency coordinator information was listed but was not correct. Alan Jones is still listed as an Alternate Environmental Emergency Coordinator. He has not been employed at the facility since

September, 2008. Updated Contingency Plan has not been submitted to local emergency authorities.

- All emergency equipment is indicated in the plan.
- Evacuation routes were included.
- Biennial Report
  - o The facility's last Biennial Report was submitted on 28MAR08
- Waste Minimization Plan
  - The Waste Minimization plan was located on site.
- Accumulation Areas
  - o There were 6 satellite accumulation areas at the facility.
  - Satellite accumulation areas within the facility consisted of one 55 gal. container. These containers were labeled correctly and were closed.
  - $\circ$  Satellite accumulation area at outside baghouse # 6.
    - Consisted of one 55 gal. container.
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste was observed outside of the container and on the baghouse pad.
    - The baghouse, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.
  - Satellite accumulation area at outside baghouse # 5.
    - Consisted of one 55 gal. container.
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste.
    - The baghouse collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. These containers of hazardous waste where not under the control of an operator. Baghouses are located outside of the facility, and are not frequently visited by employees.
    - One container of hazardous waste at baghouse #5 was not closed. The lid was not properly connected on the drum, exposing a two inch gap.
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - o It held 5 containers of D005 hazardous waste.
  - The containers were properly labeled and dated.

- There was not adequate aisle spacing of containers of hazardous waste to allow unobstructed movement of personnel or safety equipment. All waste containers, five 55 gal. containers, were blocked by a pallet of empty drums.
- Spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers.
- o The hazardous waste personnel have radios and/or cell phones.
- There is also one 8' x 10' x 8' deep in-ground FLUX PIT located on the west side of the building the collects water from the manufacturing machines. It is a self-supporting tank. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. Removal is scheduled to be completed this month. It was last removed on 4/11/08. Removed was 30,000 lbs. of D005 sludge waste.
- <u>Universal Waste/ Used Oil</u>
  - The facility utilizes GE green fluorescent tube lamps which MSDSs indicated are non-hazardous.
  - The facility stores Used Oil on the Rear Pad. Storage is in 55 gal. containers. Used Oil is recycled. No containers where present during the inspection.
- Subpart BB/CC/J
  - o None at this facility

#### 9. Site Deficiencies & Required Actions:

#### 1) Waste into Containers. 40 CFR 262.34 (a) (1) (i) states that:

Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB and CC of 40 CFR part 265.

Special Metals is in violation of this regulation in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.

#### Special Metals must place all hazardous waste into containers

2) Management of Containers. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a) states that:

•

A container of hazardous waste must always be closed, except when it is necessary to add or remove waste.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained a 55 gal. container of hazardous waste that was not closed.

Special Metals must keep all containers of hazardous waste closed except when it is necessary to add or remove waste.

3) Personnel training. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.16 (c) states that:

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section . (c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Special Metals is in violation of this regulation in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training.

Special Metals must have all hazardous waste management personnel take part in an annual review of hazardous waste training.

4) **Personnel Job Descriptions.** 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.16 (d) (2) states that:

The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining

unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

Special Metals is in violation of this regulation in that employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.

Special Metals must documented employee job descriptions for the employees handling hazardous waste.

5) Maintenance and operation of facility. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.31 states that:

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Special Metals must prevent the release of hazardous waste into the environment.

6) Aisle Space. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.35 and 15A NCAC 13A .0110 (c), states that:

A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

Special Metals is in violation of this regulation in that here was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area to allow unobstructed movement of personnel or safety equipment.

Special Metals must maintain adequate aisle spacing of waste containers in the Hazardous Waste Storage Area.

7) Amendment to Contingency Plan. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.54 (d) states that:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

Special Metals is in violation of this regulation in that the Contingency Plan has not been updated for changes in Emergency Coordinators.

Special Metals must update the Contingency Plan with correct Emergency Coordinators and submit to all local emergency authorities.

#### 8) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1) states that:

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust.

These containers of hazardous waste where not under the control of an operator.

Satellite Accumulation Areas must be under the direct control of an operator.

#### 9) Manifest Exception reporting. 40 CFR 262.42(a)(2) states that:

A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts

Special Metals is in violation of this regulation in that the signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste manifest.

Special Metals must obtain signed delivery copy for hazardous waste manifest number 1590611 and/or 1591960, and explain why there are two manifests for the same shipment of waste.

#### 10. Comments/Recommendations:

- Digital photos were taken during the inspection.
- The management of all RCRA required documents should be improved as discussed during the inspection.
- The facility should up date the RCRA facility information utilizing EPA form 8700-12 to indicate correct contact person.

1) Waste into Containers. 40 CFR 262.34 (a) (1) (i) states that:

Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB and CC of 40 CFR part 265.

Special Metals is in violation of this regulation in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.

Special Metals must place all hazardous waste into containers

2) Management of Containers. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a) states that:

A container of hazardous waste must always be closed, except when it is necessary to add or remove waste.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained a 55 gal. container of hazardous waste that was not closed.

Special Metals must keep all containers of hazardous waste closed except when it is necessary to add or remove waste.

3) Personnel training. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.16 (c) states that:

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section . (c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Special Metals is in violation of this regulation in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. Special Metals must have all hazardous waste management personnel take part in an annual review of hazardous waste training. Aisle Spacing.

4) **Personnel Job Descriptions.** 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.16 (d) (2) states that:

7

The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

Special Metals is in violation of this regulation in that employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.

Special Metals must documented employee job descriptions for the employees handling hazardous waste.

5) Maintenance and operation of facility. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.31 states that:

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Special Metals must prevent the release of hazardous waste into the environment.

6) Aisle Space. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.35 and 15A NCAC 13A .0110 (c), states that:

A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

1

Special Metals is in violation of this regulation in that here was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area to allow unobstructed movement of personnel or safety equipment.

Special Metals must maintain adequate aisle spacing of waste containers in the Hazardous Waste Storage Area.

7) Amendment to Contingency Plan. 40 CFR 262.34(a)(4) adopted by reference at 40 CFR 265.54 (d) states that:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

Special Metals is in violation of this regulation in that the Contingency Plan has not been updated for changes in Emergency Coordinators.

Special Metals must update the Contingency Plan with correct Emergency Coordinators and submit to all local emergency authorities.

#### 8) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1) states that:

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust.

These containers of hazardous waste where not under the control of an operator.

Satellite Accumulation Areas must be under the direct control of an operator.

#### 9) Manifest Exception reporting. 40 CFR 262.42(a)(2) states that:

A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts

Special Metals is in violation of this regulation in that the signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste manifest.

Special Metals must obtain signed delivery copy for hazardous waste manifest number 1590611 and/or 1591960, and explain why there are two manifests for the same shipment of waste.

	BY-	X	-	Phe	00
Company EPA ID N		d-	zecu	rne	Def
Date:	13 m	no	9		
		V	(		

Required Records/Document Checklist Large

- FACILITY WAS INSpected AS A LARGE QUANTITY GONDANTON 72,200 #/month.

The generator must provide and make available, but not limited to, any persons knowledgeable of your HW management program and the following records/documents at the time of inspection:

1. Records of weekly inspection of containers stored in designated Hazardous Waste Storage Areas.

2. Records of daily inspection of tanks containing hazardous waste.

- 3. Records of weekly inspection of drip pads (and after storms).
- V4. Job titles for each position related to hazardous waste management and the name of the employee filling each job.

5. Job description of positions related to hazardous waste management. MISSING Some.

- $V^{6}$ . Written description of type and amount of introductory and continuing training that will be given to each hazardous waste management position.
- V7. Records of annual or introductory hazardous waste training for each employee managing hazardous waste. M1951 rs Some.

V8. Copies of signed hazardous waste manifests. Missing Some.

 $\sqrt{9}$ . Copy of land ban notification for each hazardous waste transported from facility.

VIO. Copy of latest facility contingency plan. Noto Up BAters (A. Jowes)

11. Copy of Biennial Report.

12. Copy of written, description or other type of Waste Minimization Plan.

I acknowledge or certify that the noted records/documents were requested and that all records currently available and staff cognizant of these records were made available at the time of the inspection.

Signature: //. h h h 5/13/09 **Facility Contact or Representative** 

**Inspection Date** 

waste code Dum Et 3D Shy GOA# Viete ENVIRINE OF PA ENVIRITE OF PA 1 DRUM SOP en 😬 the least the state of th 7/2/08 PAD 010 154 045 에서 이렇게 하는 것이 같은 것이 있는 것이 있는 것이 가지만 것이 있는 것이 있다. 이렇게 이렇게 있는 것이 있



North Carolina Department of Environment and Natural Resources Division of Waste Management

Beverly Eaves Perdue Governor Dexter R. Matthews Director

Dee Freeman Secretary

#### **HAZARDOUS WASTE SECTION**

DRAFT #4 28MAY09

#### FACILITY INSPECTION REPORT

May 28, 2009

1.	<b>Facility Information</b> :	Special Metals Welding Products
		1401 Burris Road
		Newton, NC 28658-1754
		NCD 980 841 951, Large Quantity Generator

- 2. Facility Contact: Hewitt Linyard
- 3. <u>Survey Participants</u>: Hewitt Linyard, Bobby Catoe, Sean Morris, Stephen Barron
- 4. Date of Inspection: May 13, 2009
- 5. Purpose of Inspection: To determine compliance with 40 CFR 260-279
- 6. Facility Description:
  - The facility manufactures welding rods and products.
  - There are approximately 75 employees at this facility.
  - The nearest private residence is approximately 500 yards from the facility.
  - The facility is on city water and sewer. They have a NPDES permit.
  - The facility consists of one manufacturing building.
  - The facility was last inspected on 16APRIL08, and received a Ticket Notice of Violation Docket # 2008-079. The prior inspection on 12APRIL06, also resulted in a Notice of Violation being issued.
  - The facility personnel agreed that the facility was to be inspected as a Large Quantity Generator.
  - Average hazardous waste generation for the last month of May 13, 2009 was about 7,251 lbs.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

Page 1

	Special Metals Waste Generations Calcul	ations		•			
	<u> </u>		<u> </u>				
	Waste shipments D005 Barlum Drummed Haza	rdous Waste	+	· · · · · · · · · · · · · · · · · · ·			
4/7/2009	Shipped	12 Drums	8,585 lbs.	or 715 # / Drum			
5/13/2009	In Inventory During RCRA Inspction						
	<90 Storage area	5 Drums	3,575 bs.	@715#/Drum			
	Plus Baghouse Drums	3 Drums	1074 lbs.	@ est. 1/2 full or 358#/Drum			
	Plus on the ground at the Baghouse		2 lbs.	estimate			
	Plus 6 Satellitte Accumulation Drums		100 lbs.	estimate			
	In Facility						
	Plus Weste D005 in Sludge Pit		2,500 lbs.	per month based on last year's			
				annual waste generated amount.			
				(Pt is full with one year's waste)			
	7,251 lbs. average monthly generation for month ending May 13, 2009						

7. Waste Type:

- The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste annually. The facility generates about 5 drums per month of Barium waste or about 3,575 lbs. of drummed waste per month, plus baghouse generation. Annual shipment of sludge from the water treatment pit generates about 2,500 lbs. per month.
- They ship in 55 gal drum containers and occasional metal roll off containers.

#### 8. Areas of Inspection:

- <u>Manifests</u>
  - Manifests where inspected. The facility had difficulty supplying all manifests. Manifest management was not adequate.
    - Signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste.
       Facility personnel could not explain why there were two manifest documents for the same shipment. (Violation #5).
    - Land Disposal Restrictions included.
    - The manifests inspected were completed correctly.
    - Drummed hazardous waste shipments are made approximately every three month. Metal roll offs are shipped annually.
  - o Transporter: Envirite of Ohio OHD 980 568 992
  - TSD: Envirite of Ohio OHD 980 568 992

- Weekly Inspections
  - o Weekly inspections documents were reviewed.
  - o Inspections are being performed and documented correctly.
- Training
  - Not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and both do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. Both Steve Winnell and Tom Dickerson have been in the position of environmental emergency coordinators at least since May 22, 2008 through the present. (Violation #6).
  - Employee job descriptions for the employees handling hazardous waste are not documented and could not be provided by Hewitt Linyard. Job descriptions for hazardous waste management is not documented for Hewitt Linyard (signed hazardous waste manifest 1990976), Bobby Catoe (signed hazardous waste manifest 1993147), and Willie Logan (signed hazardous waste manifest 1992740). (Violation #7).
  - Hazardous waste annual training of other employees is taking place. Last training date was 27MAY08.
- Emergency Preparedness
  - The facility has system for notification of employees in the case of a fire or emergency.
  - Emergency equipment is mapped and maintained.
  - There has not been a major emergency at this facility.
  - The facility has only limited internal emergency response capabilities, and relies heavily on outside emergency response agencies.
  - o ADT completes monthly fire sprinkler inspections.
  - Fire extinguishers are checked monthly.
  - Key employees carry radios and/or cell phones.
- <u>Contingency Plan</u>
  - The facility had completed and documented arrangements with local emergency authorities to include Fire Marshall, Catawba County Emergency Services, Newton Police, Newton POTW, Catawba Memorial Hospital, and STAT Inc.
  - Their Contingency Plan was located on site.
  - Emergency coordinator information was listed but was not correct. Alan Jones is still listed as an Alternate Environmental Emergency Coordinator. He has not been employed at the facility since

September, 2008. Updated Contingency Plan has not been submitted to local emergency authorities. (Violation # 9).

- o All emergency equipment is indicated in the plan.
- Evacuation routes were included.
- <u>Biennial Report</u>
  - o The facility's last Biennial Report was submitted on 28MAR08
- Waste Minimization Plan
  - o The Waste Minimization plan was located on site.
- Accumulation Areas
  - There were 6 satellite accumulation areas at the facility.
  - Satellite accumulation areas within the facility consisted of one 55 gal. container. These containers were labeled correctly and were closed.
  - Satellite accumulation area at outside baghouse # 6.
    - Consisted of one 55 gal. container.
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste was observed outside of the container and on the baghouse pad.
    - The baghouse, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil. (Violation # 8).
  - o Satellite accumulation area at outside baghouse # 5.
    - Consisted of one 55 gal. container.
      - The container was labeled correctly.
      - Dust identified by Bobby Catoe as D005 Barium dust waste.
      - The baghouse collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. These containers of hazardous waste where not under the control of an operator. Baghouses are located outside of the facility, and are not frequently visited by employees (Violation #4).
      - One container of hazardous waste at baghouse #5 was not closed. The lid was not properly connected on the drum, exposing a two inch gap (Violation # 1).
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - o It held 5 containers of D005 hazardous waste.
  - The containers were properly labeled and dated.

- There was not adequate aisle spacing of containers of hazardous waste to allow unobstructed movement of personnel or safety equipment. All waste containers, five 55 gal. containers, were blocked by a pallet of empty drums (Violation #2).
- Spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers. (Violation #3).
- o The hazardous waste personnel have radios and/or cell phones.
- There is also one 8' x 10' x 8' deep in-ground FLUX PIT located on the west side of the building the collects water from the manufacturing machines. It is a self-supporting tank. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. Removal is scheduled to be completed this month. It was last removed on 4/11/08. Removed was 30,000 lbs. of D005 sludge waste.
- Universal Waste/ Used Oil
  - The facility utilizes GE green fluorescent tube lamps which MSDSs indicated are non-hazardous.
  - The facility stores Used Oil on the Rear Pad. Storage is in 55 gal. containers. Used Oil is recycled. No containers where present during the inspection.
- Subpart BB/CC/J
  - None at this facility

#### 9. Site Deficiencies & Required Actions:

1) Management of Containers. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110 states that:

A container of hazardous waste must always be closed, except when it is necessary to add or remove waste.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained a 55 gal. container of hazardous waste that was not closed.

Special Metals must keep all containers of hazardous waste closed except when it is necessary to add or remove waste.

2) Aisle Spacing. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a), adopted by reference 15A NCAC 13A .0110 (c), states that:

A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

Special Metals is in violation of this regulation in that here was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area to allow unobstructed movement of personnel or safety equipment.

Special Metals must maintain adequate aisle spacing of waste containers in the Hazardous Waste Storage Area.

3) Waste into Containers. 40 CFR 262.34 (a) (1) (i), adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110, states that:

Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB and CC of 40 CFR part 265.

Special Metals is in violation of this regulation in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.

Special Metals must place all hazardous waste into containers

4) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1), adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110 states that:

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust.

These containers of hazardous waste where not under the control of an operator.

Satellite Accumulation Areas must be under the direct control of an operator.

5) Manifest Exception reporting. 40 CFR 262.42, adopted by reference at 15A NCAC 13A .0107, states that:

A generator of greater than 1000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

(2) A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts

Special Metals is in violation of this regulation in that signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste manifest.

Special Metals must obtain signed delivery copy for hazardous waste manifest number 1590611 and/or 1591960, and explain why there are two manifests for the same shipment of waste.

6) **Personnel training.** 40 CFR 265.16 (c), adopted by reference at 15A NCAC 13A .0110, states that:

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section . (c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Special Metals is in violation of this regulation in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training.

Special Metals must have all hazardous waste management personnel take part in an annual review of hazardous waste training.

7) Personnel Job Descriptions. 40 CFR 265.16 (d) (2), adopted by reference at 15A NCAC 13A .0110, states that:

The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

Special Metals is in violation of this regulation in that employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.

Special Metals must documented employee job descriptions for the employees handling hazardous waste.

8) Maintenance and operation of facility. 40 CFR 265.31, adopted by reference at 15A NCAC 13A .0110, states that:

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Special Metals must prevent the release of hazardous waste into the environment.

9) Amendment to Contingency Plan. 40 CFR 265.54 (d), adopted by reference at 15A NCAC 13A .0110, states that:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The facility changes—in its design, construction, operation, maintenance, or other circumstances—in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(d) The list of emergency coordinators changes; or

(e) The list of emergency equipment changes.

Special Metals is in violation of this regulation in that the Contingency Plan has not been updated for changes in Emergency Coordinators.

Special Metals must update the Contingency Plan with correct Emergency Coordinators and submit to all local emergency authorities.

#### 10. Comments/Recommendations:

- Digital photos were taken during the inspection.
- The management of all RCRA required documents should be improved as discussed during the inspection.
- The facility should up date the RCRA facility information utilizing EPA form 8700-12 to indicate correct contact person.

#### 11. Photos:



PHOTO #1 Special Metals -Rear Pad Hazardous Waste Storage Area -No adequate aisle spacing



PHOTO #2 Special Metals -Rear Pad Hazardous Waste Storage Area -Hazardous waste, D005, not in containers



## PHOTO #3 Special Metals -Baghouse #6 Satellite Accumulation Area

-D005 Barium Hazardous Waste outside of container

-Failure to maintain facility to minimize the possibility of an unplanned release of hazardous waste to soil and surface water.



**РНОТО #4** 



**РНОТО #5** 

Special Metals

-Baghouse #5 Satellite Accumulation Area

-Area not under the direct control of an operator.

-Container not closed.



**РНОТО #6** 

## Stephen H. Barron Environmental Senior Specialist

t

Date

### cc: Facility MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040 Page 14

.

Numfest 1 - 262.425 (10) Trum, 2 265.16 c (2) 110. JoB Da. - 3 26 5.14 (2) (D 110 and the second An Conley. -4-265,54(d) (9),10 Antonia . Mum FAR 5 65.31 (8) 110 DATINON 1 6 267.34 C 1 0 565.173 (C) 110 Not dough \$ 262. 34 (a) (1 ) (0 265-173 (a) NOT COM 8 262. 34 (G) 1 (1) (G) 15A NCAC EN 13A worken wit 9 262, 3 get 1 1 101 110

And 264,35

JAMIEO KRÍTZER @ NC DUNR, GO

a a marcha a tha an an a

Subject: Re: Special Metals Other Comments From: Brent Burch <Brent.Burch@ncmail.net> Date: Thu, 28 May 2009 07:52:09 -0400 To: Steve Barron <Steve.Barron@ncmail.net>

Take out the comment you highlighted (more than 55-gal) and leave it at that.

We rearranged for PFI, not for this one. We do need to reference from 262 to 265 and arrange them in order. Call me if you want to go over them together.....Brent.

Steve Barron wrote:

BB

I guess I am still asleep ...

From your comments, is the below that is in Draft #3 OK...or maybe I need to just take out the "more than 55 gal "comments?"

or do I need to do violations for a Storage Area...? I think the drums were labeled.....probably did not have the dates, but do not know for sure, probably did not do weekly inspections, but not sure.

Thanks.....S. Barron

6) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1), adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110 states that :

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section. Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. The hazardous waste at this area exceeded 55 gals. of total hazardous waste.

These containers of hazardous waste where not under the control of an operator.

Special Metals must not have more than 55 gals. of hazardous waste in a Satellite Accumulation Area.

Satellite Accumulation Areas must be under the direct control of an operator.

#### Brent Burch wrote:

My thoughts are that we can't say they are not satellite (not under control of the operator) and then also say they are in violation because it's over 55-gallon. So lets say it is a violation because the "containers are not under the control of the operator" and leave it at that.

Steve Barron wrote:

7. Violation #6. We may need to change that since it is not considered a satellite area but a storage area. Probably should cite them for no dates, no inspections, no communication device, etc.

 Subject: Re: Special Metals Other Comments From: Brent Burch <Brent.Burch@ncmail.net> Date: Wed, 27 May 2009 15:44:46 -0400 To: Steve Barron <Steve.Barron@ncmail.net>

My thoughts are that we can't say they are not satellite (not under control of the operator) and then also say they are in violation because it's over 55-gallon. So lets say it is a violation because the "containers are not under the control of the operator" and leave it at that.

Steve Barron wrote:

7. Violation #6. We may need to change that since it is not considered a satellite area but a storage area. Probably should cite them for no dates, no inspections, no communication device, etc.

I looked at it as a Satellite.....

according to some of the photos, it looks like there were labels with Hazardous Waste on them.....can not be sure for all drums..

My notes only indicated that they were labeled ...... (good enough for Sat)

I did not note if there were dates on the label....may or may not have been on there..(good enough for Sat) also they will say they carry radios (what was said for Storage Areas)

I could not be sure if they listed these areas on the weekly inspection logs......may have....I just made sure the main Storage Area was on it.

Thanks.....S. Barron

Brent G. Burch Western Area Compliance Supervisor Hazardous Waste Section - Division of Waste Management NC Dept. of Environment and Natural Resources Voice: 828-321-9585 Brent.Burch@ncmail.net

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

Subject: Special Metal Draft 3 From: Steve Barron <Steve.Barron@ncmail.net> Date: Wed, 27 May 2009 14:02:59 -0400 To: Brent Burch <Brent.Burch@ncmail.net>

1. DONE Page3 - Put "Both Mr. Winnell and Mr. Dickerson have been in the position..." Include when Mr. Linyard started his position and if he has any training.

2. DONE Include who the arrangements are with for the contingency plan.

3. DONEPut the first three bullets under baghouse #6 also under #5. Under #5 put the container at #5 was not closed.....

4. DONEHow many containers were blocked in the storage area?

5. DONE is the FLUX PIT a surface impoundment or tank that we regulate? It reads like it is a haz waste storage unit.

6. Violation should read, " in that the Baghouse # 6 hazardous waste container was open, and...."?? Only Baghouse #5 was OPEN....Baghouse #6 had the spill???

7. They called it a Satellite...... Violation #6. We may need to change that since it is not considered a satellite area but a storage area. Probably should cite them for no dates, no inspections, no communication device, etc. One could always go either way when there is more than 55 gal at a Satellite, and even go a third way with the failure to move in 3 days.....also they may come back with the measurement of the waste taken after we left, they might state that there was less than 55 gals of waste total....???

8. We are going to have to reference the violations from 262.34(a)(4) for some and rearrange them in order.

Correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue Governor

Division of Waste Management Dexter R. Matthews Director

Dee Freeman Secretary

### **HAZARDOUS WASTE SECTION**

## DRAFT #3 27MAY09 FACILITY INSPECTION REPORT

May 27, 2009

1.	<b>Facility Information:</b>	Special Metals Welding Products
		1401 Burris Road
		Newton, NC 28658-1754
		NCD 980 841 951, Large Quantity Generator

- 2. Facility Contact: Hewitt Linyard
- 3. <u>Survey Participants</u>: Hewitt Linyard, Bobby Catoe, Sean Morris, Stephen Barron
- 4. Date of Inspection: May 13, 2009
- 5. Purpose of Inspection: To determine compliance with 40 CFR 260-279

#### 6. Facility Description:

- The facility manufactures welding rods and products.
- There are approximately 75 employees at this facility.
- The nearest private residence is approximately 500 yards from the facility.
- The facility is on city water and sewer. They have a NPDES permit.
- The facility consists of one manufacturing building.
- The facility was last inspected on 16APRIL08, and received a Ticket Notice of Violation Docket # 2008-079. The prior inspection on 12APRIL06, also resulted in a Notice of Violation being issued.
- The facility personnel agreed that the facility was to be inspected as a Large Quantity Generator.
- Average hazardous waste generation for the last month of May 13, 2009 was about 7,251 lbs.

	Special Metals Waste Generations Calcula	ations			
4/7/2009	Waste shipments D005 Barlum Drummed Hazar	dous Waste 12 Drums	8 585 be	or 715 # / Drum	
			0,000 83.		
5/13/2009	in Inventory During RCRA Inspction				
	<90 Storage area	5 Drums	3,575 lbs.	@715 #Drum	
	Plus Beghouse Drums	3 Drums	1074 lbs.	@ est. 1/2 full or 358#0rum	
	Plus on the ground at the Baghouse		2 lbs.	estimate	
	Plus 6 Satellitte Accumulation Drums		100 lbs,	estinate	
	In Facility			· · · · · · · · · · · · · · · · · · ·	
	Plus Weste D005 in Sludge Pit		2,500 lbs.	per month based on last year's	
				ennuel waste generiated emount. (Pt is full with one year's waste)	
	7251 bs	. average monthly	generation fo	r month ending May 13, 2009	

7. <u>Waste Type</u>:

- The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste annually. The facility generates about 5 drums per month of Barium waste or about 3,575 lbs. of drummed waste per month, plus baghouse generation. Annual shipment of sludge from the water treatment pit generates about 2,500 lbs. per month.
- They ship in 55 gal drum containers and occasional metal roll off containers.

## 8. Areas of Inspection:

- <u>Manifests</u>
  - Manifests where inspected. The facility had difficulty supplying all manifests. Manifest management was not adequate.
    - Signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste.
       Facility personnel could not explain why there were two manifest documents for the same shipment. (Violation #1).
    - Land Disposal Restrictions included.
    - The manifests inspected were completed correctly.
    - Drummed hazardous waste shipments are made approximately every three month. Metal roll offs are shipped annually.
  - o Transporter: Envirite of Ohio OHD 980 568 992
  - o TSD: Envirite of Ohio OHD 980 568 992

- Weekly Inspections
  - o Weekly inspections documents were reviewed.
  - o Inspections are being performed and documented correctly.
- Training
  - Not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and both do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. Both Steve Winnell and Tom Dickerson have been in the position of environmental emergency coordinators at least since May 22, 2008 through the present. (Violation #2).
  - Employee job descriptions for the employees handling hazardous waste are not documented and could not be provided by Hewitt Linyard. Job descriptions for hazardous waste management is not documented for Hewitt Linyard (signed hazardous waste manifest 1990976), Bobby Catoe (signed hazardous waste manifest 1993147), and Willie Logan (signed hazardous waste manifest 1992740). (Violation #3).
  - Hazardous waste annual training of other employees is taking place. Last training date was 27MAY08.
- Emergency Preparedness
  - The facility has system for notification of employees in the case of a fire or emergency.
  - Emergency equipment is mapped and maintained.
  - There has not been a major emergency at this facility.
  - The facility has only limited internal emergency response capabilities, and relies heavily on outside emergency response agencies.
  - ADT completes monthly fire sprinkler inspections.
  - Fire extinguishers are checked monthly.
  - Key employees carry radios and/or cell phones.
- <u>Contingency Plan</u>
  - The facility had completed and documented arrangements with local emergency authorities to include Fire Marshall, Catawba County Emergency Services, Newton Police, Newton POTW, Catawba Memorial Hospital, and STAT Inc.
  - o Their Contingency Plan was located on site.
  - Emergency coordinator information was listed but was not correct. Alan Jones is still listed as an Alternate Environmental Emergency Coordinator. He has not been employed at the facility since

September, 2008. Updated Contingency Plan has not been submitted to local emergency authorities. (Violation # 4).

- o All emergency equipment is indicated in the plan.
- o Evacuation routes were included.
- Biennial Report
  - The facility's last Biennial Report was submitted on 28MAR08
- Waste Minimization Plan
  - The Waste Minimization plan was located on site.
- Accumulation Areas
  - There were 6 satellite accumulation areas at the facility.
  - Satellite accumulation areas within the facility consisted of one 55 gal. container. These containers were labeled correctly and were closed.
  - Satellite accumulation area at outside baghouse # 6.
    - Consisted of one 55 gal. container.
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste was observed outside of the container and on the baghouse pad.
    - The baghouse, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil. (Violation # 5).
  - o Satellite accumulation area at outside baghouse # 5.
    - Consisted of one 55 gal. container.
      - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste.
    - The baghouse collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. The hazardous waste at this area exceeded 55 gals. of total hazardous waste. (Violation #6 first part)
    - These containers of hazardous waste where not under the control of an operator. Baghouses are located outside of the facility, and are not frequently visited by employees (Violation #6 second part).
    - One container of hazardous waste at baghouse #5 was not closed. The lid was not properly connected on the drum, exposing a two inch gap (Violation # 7).
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - o It held 5 containers of D005 hazardous waste.

- The containers were properly labeled and dated.
- There was not adequate aisle spacing of containers of hazardous waste to allow unobstructed movement of personnel or safety equipment. All waste containers, five 55 gal. containers, were blocked by a pallet of empty drums (Violation #8).
- Spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers. (Violation #9).
- o The hazardous waste personnel have radios and/or cell phones.
- There is also one 8' x 10' x 8' deep in-ground FLUX PIT located on the west side of the building the collects water from the manufacturing machines. It is a self-supporting tank. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. Removal is scheduled to be completed this month. It was last removed on 4/11/08. Removed was 30,000 lbs. of D005 sludge waste.

#### Universal Waste/ Used Oil

- The facility utilizes GE green fluorescent tube lamps which MSDSs indicated are non-hazardous.
- The facility stores Used Oil on the Rear Pad. Storage is in 55 gal. containers. Used Oil is recycled. No containers where present during the inspection.

### Subpart BB/CC/J

• None at this facility

#### 9. Site Deficiencies & Required Actions:

1) Manifest Exception reporting. 40 CFR 262.42, adopted by reference at 15A NCAC 13A .0107, states that:

A generator of greater than 1000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

(2) A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest

with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts

Special Metals is in violation of this regulation in that signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste manifest.

Special Metals must obtain signed delivery copy for hazardous waste manifest number 1590611 and/or 1591960, and explain why there are two manifest for the same shipment of waste.

2) **Personnel training.** 40 CFR 265.16 (c), adopted by reference at 15A NCAC 13A .0110, states that:

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section . (c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Special Metals is in violation of this regulation in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training.

Special Metals must have all hazardous waste management personnel take part in an annual review of hazardous waste training.

3) **Personnel Job Descriptions.** 40 CFR 265.16 (d) (2), adopted by reference at 15A NCAC 13A .0110, states that:

The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

Special Metals is in violation of this regulation in that employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.

Special Metals must documented employee job descriptions for the employees handling hazardous waste.

4) Amendment to Contingency Plan. 40 CFR 265.54 (d), adopted by reference at 15A NCAC 13A .0110, states that:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The facility changes—in its design, construction, operation, maintenance, or other circumstances—in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(d) The list of emergency coordinators changes; or

(e) The list of emergency equipment changes.

Special Metals is in violation of this regulation in that the Contingency Plan has not been updated for changes in Emergency Coordinators.

Special Metals must update the Contingency Plan with correct Emergency Coordinators and submit to all local emergency authorities.

5) Maintenance and operation of facility. 40 CFR 265.31, adopted by reference at 15A NCAC 13A .0110, states that:

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Special Metals must prevent the release of hazardous waste into the environment.

6) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1), adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110 states that :

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. The hazardous waste at this area exceeded 55 gals. of total hazardous waste.

These containers of hazardous waste where not under the control of an operator.

Special Metals must not have more than 55 gals. of hazardous waste in a Satellite Accumulation Area.

Satellite Accumulation Areas must be under the direct control of an operator.

7) Management of Containers. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110 states that:

A container of hazardous waste must always be closed, except when it is necessary to add or remove waste.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained a 55 gal. container of hazardous waste that was not closed.

Special Metals must keep all containers of hazardous waste closed except when it is necessary to add or remove waste.

8) Aisle Spacing. 40 CFR 262.34(a)(1)(i) adopted by reference 15A NCAC 13A .0110(c), states that:

A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

Special Metals is in violation of this regulation in that here was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area to allow unobstructed movement of personnel or safety equipment.

Special Metals must maintain adequate aisle spacing of waste containers in the Hazardous Waste Storage Area.

9) Waste into Containers. 40 CFR 262.34 (a) (1) (i), adopted by reference at 15A NCAC 13A .0107, states that:

Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB and CC of 40 CFR part 265.

Special Metals is in violation of this regulation in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.

Special Metals must place all hazardous waste into containers.

### 10. Comments/Recommendations:

- Digital photos were taken during the inspection.
- The management of all RCRA required documents should be improved as discussed during the inspection.
- The facility should up date the RCRA facility information utilizing EPA form 8700-12 to indicate correct contact person.

## 11. Photos:



PHOTO #1 Special Metals -Rear Pad Hazardous Waste Storage Area -No adequate aisle spacing



PHOTO #2 Special Metals -Rear Pad Hazardous Waste Storage Area -Hazardous waste, D005, not in containers



## PHOTO #3 Special Metals

-Baghouse #6 Satellite Accumulation Area

-D005 Barium Hazardous Waste outside of container

-Failure to maintain facility to minimize the possibility of an unplanned release of hazardous waste to soil and surface water.



**РНОТО #4** 



РНОТО #5

Special Metals

-Baghouse #5 Satellite Accumulation Area

-Greater than 55 gals. of hazardous waste in a Satellite Accumulation Area.

-Area not under the direct control of an operator.

-Container not closed.



PHOTO #6

Stephen H. Barron Environmental Senior Specialist

.

Date

1

cc: Facility MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files

Subject: Re: Special Metals Draft #2 From: Brent Burch <Brent.Burch@ncmail.net> Date: Wed, 27 May 2009 10:38:05 -0400 To: Steve Barron <Steve.Barron@ncmail.net> CC: "Morris, Sean" <sean.morris@ncdenr.gov>

Here are my comments:

1. Page3 - Put "Both Mr. Winnell and Mr. Dickerson have been in the position..." Include when Mr. Linyard started his position and if he has any training.

 $\sqrt{2}$ . Include who the arrangements are with for the contingency plan.

3-Put the first three bullets under baghouse #6 also under #5. Under #5 put the container at #5 was not closed......

4. How many containers were blocked in the storage area?

5. Is the FLUX PIT a surface impoundment or tank that we regulate? It reads like it is a haz waste storage unit.

)6. Violation should read, " in that the Baghouse # 6 hazardous waste container was open , and ....."

7. Violation #6. We may need to change that since it is not considered a satellite area but a storage area. Probably should cite them for no dates, no inspections, no communication device, etc.

8. We are going to have to reference the violations from 262.34(a)(4) for some and rearrange them in order.

Call me if you have questions....Brent.

Steve Barron wrote:

See attached...

Thanks.....S. Barron

Correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

Brent G. Burch Western Area Compliance Supervisor Hazardous Waste Section - Division of Waste Management NC Dept. of Environment and Natural Resources Voice: 828-321-9585 Brent.Burch@ncmail.net

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue Governor Division of Waste Management Dexter R. Matthews Director

Dee Freeman Secretary

### **HAZARDOUS WASTE SECTION**

### DRAFT #2 19MAY09 FACILITY INSPECTION REPORT

May 19, 2009

- 1. Facility Information: Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 NCD 980 841 951, Large Quantity Generator
- 2. Facility Contact: Hewitt Linyard
- 3. <u>Survey Participants</u>: Hewitt Linyard, Bobby Catoe, Sean Morris, Stephen Barron
- 4. Date of Inspection: May 13, 2009
- 5. Purpose of Inspection: To determine compliance with 40 CFR 260-279
- 6. Facility Description:
  - The facility manufactures welding rods and products.
  - There are approximately 75 employees at this facility.
  - The nearest private residence is approximately 500 yards from the facility.
  - The facility is on city/water and sewer. They have a NPDES permit.
  - The facility consists/of one manufacturing building.
  - The facility was last inspected on 16APRIL08, and received a Ticket Notice of Violation Docket # 2008-079. The prior inspection on 12APRIL06, also resulted in a Notice of Violation being issued.
  - The facility personnel agreed that the facility was to be inspected as a Large Quantity Generator.
  - Average hazardous waste generation for the last month of May 13, 2009 was about 6,711 lbs.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

Page 1

	Special Metals	Waste Generation	ne Celcula	tions	<u> </u>	·			
	openial metala	Thate Sellerador	io calcule			<u> </u>			
	Waste shinments	0005 Barium Drummed	Hazardous V	Nasta			···		
4/7/2009	Shipped		12 Drums	8,585 lbs.	07 715 #/	Drum			
5/13/2009	In Inventory Duri	ng RCRA Inspction					- the		
	<90 Storage are	a	5 Drums		@715 #C	)ณฑ	350		
				1074		1/2	700		
	Plus Baghouse Drums		3 Drums	E34 lbs.	1/2 @ est. ## full or 176#/Drum				
	Plus on the ground at the Baghouse			2 lbs.	estimate				
	Plus 6 Satellitte		100 lbs.	estimate					
	in Facility								
	Plus Waste D005 in Sludge Pit			2,500 lbs.			last year's		
					annual waste generated amount.				
					(Pit is full with one year's waste)				
		<u>לכר / </u>				L	. <u> </u>		
		10	<u> </u>	L		1	<u>i</u>		
	-6.711 lbs. average monthly generation for month ending May 13, 2009								

## 7. <u>Waste Type</u>:

- The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste annually. The facility generates about 5 drums per month of Barium waste or about 3,575 lbs. of drummed waste per month. Annual shipment of sludge from the water treatment pit generates about 2,500 lbs. per month.
- They ship in 55 gal drum containers and occasional metal roll off containers.

## 8. Areas of Inspection:

- <u>Manifests</u>
  - Manifests where inspected. The facility had difficulty supplying all manifests. Manifest management was not adequate.
    - Signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste. Facility personnel could not explain why there were two manifest documents for the same shipment. (Violation #1).
    - Land Disposal Restrictions included.
    - The manifests inspected were completed correctly.
    - Drummed hazardous waste shipments are made approximately every three month. Metal roll offs are shipped annually.
  - o Transporter: Envirite of Ohio OHD 980 568 992
  - o TSD: Envirite of Ohio OHD 980 568 992

- Weekly Inspections
  - o Weekly inspections documents were reviewed.
  - o Inspections are being performed and documented correctly.
- <u>Training</u>
  - Not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. Both have been in the position of environmental emergency coordinators at least since May 22, 2008 through the present. (Violation #2).
  - Employee job descriptions for the employees handling hazardous waste are not documented and could not be provided by Hewitt Linyard. Job descriptions for hazardous waste management is not documented for Hewitt Linyard (signed hazardous waste manifest 1990976), Bobby Catoe (signed hazardous waste manifest 1993147), and Willie Logan (signed hazardous waste manifest 1992740). (Violation #3).
  - Hazardous waste annual training of other employees is taking place. Last training date was 27MAY08.
- Emergency Preparedness
  - The facility has system for notification of employees in the case of a fire or emergency.
  - o Emergency equipment is mapped and maintained.
  - There has not been a major emergency at this facility.
  - The facility has only limited internal emergency response capabilities, and relies heavily on outside emergency response agencies.
  - o ADT completes monthly fire sprinkler inspections.
  - Fire extinguishers are checked monthly.
  - Key employees carry radios and/or cell phones.
- Contingency Plan
  - The facility has completed and documented arrangements with local emergency authorities.
  - o Their Contingency Plan was located on site.
  - Emergency coordinator information was listed but was not correct. Alan Jones is still listed as an Alternate Environmental Emergency Coordinator. He has not been employed at the facility since September, 2008. Updated Contingency Plan has not been submitted to local emergency authorities. (Violation # 4).

- All emergency equipment is indicated in the plan.
- Evacuation routes were included.
- Biennial Report
  - o The facility's last Biennial Report was submitted on 28MAR08
- Waste Minimization Plan
  - The Waste Minimization plan was located on site.
- Accumulation Areas
  - There were 6 satellite accumulation areas at the facility.
  - Satellite accumulation areas within the facility consisted of one 55 gal. container. These containers were labeled correctly and were closed.
  - Satellite accumulation area at outside baghouse # 6.
    - Consisted of one 55 gal. container.
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste was observed outside of the container and on the baghouse pad.
    - The baghouse, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil. (Violation # 5).
  - Satellite accumulation area at outside baghouse # 5.
    - The baghouse collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. The hazardous waste at this area exceeded 55 gals. of total hazardous waste. (Violation #6 first part)
    - These containers of hazardous waste where not under the control of an operator. Baghouses are located outside of the facility, and are not frequently visited by employees (Violation #6 second part).
    - One container of hazardous waste was not closed. The lid was not properly connected on the drum, exposing a two inch gap (Violation # 7).
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - o It held 5 containers of D005 hazardous waste.
  - o The containers were properly labeled and dated.
  - There was not adequate aisle spacing of containers of hazardous waste to allow unobstructed movement of personnel or safety equipment.
  - 610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

Waste containers were blocked by a pallet of empty drums (Violation #8).

- Spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers. (Violation #9).
- The hazardous waste personnel have radios and/or cell phones.
- There is also one 8' x 10' x 8' deep in-ground FLUX PIT located on the west side of the building the collects water from the manufacturing machines. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. Removal is scheduled to be completed this month. It was last removed on 4/11/08. Removed was 30,000 lbs. of D005 sludge waste.
- <u>Universal Waste/ Used Oil</u>
  - The facility utilizes GE green fluorescent tube lamps which MSDSs indicated are non-hazardous.
  - The facility stores Used Oil on the Rear Pad. Storage is in 55 gal. containers. Used Oil is recycled. No containers where present during the inspection.
- <u>Subpart BB/CC/J</u>
  - None at this facility

#### 9. Site Deficiencies & Required Actions:

1) Manifest Exception reporting. 40 CFR 262.42, adopted by reference at 15A NCAC 13A .0107, states that:

A generator of greater than 1000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

(2) A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts

Special Metals is in violation of this regulation in that signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste manifest.

Special Metals must obtain signed delivery copy for hazardous waste manifest number 1590611 and/or 1591960, and explain why there are two manifest for the same shipment of waste.

2) **Personnel training.** 40 CFR 265.16 (c), adopted by reference at 15A NCAC 13A .0110, states that:

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section . (c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Special Metals is in violation of this regulation in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training.

Special Metals must have all hazardous waste management personnel take part in an annual review of hazardous waste training.

3) Personnel Job Descriptions. 40 CFR 265.16 (d) (2), adopted by reference at 15A NCAC 13A .0110, states that:

The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

Special Metals is in violation of this regulation in that employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.

Special Metals must documented employee job descriptions for the employees handling hazardous waste.

4) Amendment to Contingency Plan. 40 CFR 265.54 (d), adopted by reference at 15A NCAC 13A .0110, states that:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The facility changes—in its design, construction, operation, maintenance, or other circumstances—in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(d) The list of emergency coordinators changes; or

(e) The list of emergency equipment changes.

Special Metals is in violation of this regulation in that the Contingency Plan has not been updated for changes in Emergency Coordinators.

Special Metals must update the Contingency Plan with correct Emergency Coordinators and submit to all local emergency authorities.

5) Maintenance and operation of facility. 40 CFR 265.31, adopted by reference at 15A • NCAC 13A .0110, states that:

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or

hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Special Metals must prevent the release of hazardous waste into the environment.

6) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1), adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110 states that :

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. The hazardous waste at this area exceeded 55 gals. of total hazardous waste.

These containers of hazardous waste where not under the control of an operator.

Special Metals must not have more than 55 gals. of hazardous waste in a Satellite Accumulation Area.

Satellite Accumulation Areas must be under the direct control of an operator.

7) Management of Containers. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0110 states that:

A container of hazardous waste must always be closed, except when it is necessary to add or remove waste.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained a 55 gal. container of hazardous waste that was not closed.

Special Metals must keep all containers of hazardous waste closed except when it is necessary to add or remove waste.

8) Aisle Spacing. 40 CFR 262.34(a)(1)(i) adopted by reference 15A NCAC 13A .0110 (c), states that:

A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

Special Metals is in violation of this regulation in that here was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area to allow unobstructed movement of personnel or safety equipment.

Special Metals must maintain adequate aisle spacing of waste containers in the Hazardous Waste Storage Area.

9) Waste into Containers. 40 CFR 262.34 (a) (1) (i), adopted by reference at 15A NCAC 13A .0107, states that:

Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB and CC of 40 CFR part 265.

Special Metals is in violation of this regulation in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.

Special Metals must place all hazardous waste into containers.

#### 10. Comments/Recommendations:

- Digital photos were taken during the inspection.
- The management of all RCRA required documents should be improved as discussed during the inspection.
- The facility should up date the RCRA facility information utilizing EPA form 8700-12 to indicate correct contact person.

## 11. Photos:



PHOTO #1 Special Metals -Rear Pad Hazardous Waste Storage Area -No adequate aisle spacing



PHOTO #2 Special Metals -Rear Pad Hazardous Waste Storage Area -Hazardous waste, D005, not in containers



# PHOTO #3

Special Metals

-Baghouse #6 Satellite Accumulation Area

-D005 Barium Hazardous Waste outside of container

-Failure to maintain facility to minimize the possibility of an unplanned release of hazardous waste to soil and surface water.



PHOTO #4



РНОТО #5

Special Metals

-Baghouse #5 Satellite Accumulation Area

-Greater than 55 gals. of hazardous waste in a Satellite Accumulation Area.

-Area not under the direct control of an operator.

-Container not closed.



**РНОТО #6** 

Stephen H. Barron Environmental Senior Specialist

.

Date

cc: Facility MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files

FAQ's

Webmaster

Parcel	Report	-	Catawba	County,	NC

Parcel Information:	Owner Information:
Parcel ID: 374008797592	Name: HUNTINGTON ALLOYS CORPORATION
Parcel Address: 1401 BURRIS RD	Name2:
City: NEWTON 28658	Address: 3200 RIVERSIDE DR
LRK(REID): 33851	Address2:
Deed Book/Page: CO56/0815 Deed Image	City: HUNTGINTON
Subdivision:	State/Zip: WV 25705-1737
Lots:	
Block:	
Last Sale: \$123,500 on 5/1/1984	]
Plat Book/Page: 19/153	School Information:
Calculated Acreage: 14.45	School District: NEWTON CONOVER
Tax Map: 059N 02015F	Elementary School: THORNTON
State Road: 1746	Middle School: NEWTON CONOVER
Township: NEWTON	High School: NEWTON CONOVER
	][
Tax/Value Information: Tax Rates(pdf)	Zoning Information:
Municipal Tax District: NEWTON	Zoning District: NEWTON
Fire District:	Zoning1: M-1
Tax Account Number: 179062	Zoning2:
Market Building(s) Value: \$1,251,300	Zoning3:
Market Land Value: \$309,800	Zoning Overlay:
Market Total Value: \$1,561,100	Small Area:
Year Built/Remodeled: 1984	Split Zoning District 1/2: 0/0
Current Tax Bill	Zoning Agency Phone Numbers
Miscellaneous:	
Voter Precinct: P22	Firm Panel Date: 9/5/2007
Building Code: COMMERCIAL or INDUSTRIA	L Firm Panel #:
Building Permits for this parcel	2010 Census Tract: 011300
WaterShed:	2010 Census Block: 2005
WaterShed Split:	
Parcel Report Data Descriptions	

DISCLAIMER: This map/report product was prepared from the Catawba County, NC Geospatial Information Services. Catawba County has made substantial efforts to ensure the accuracy of location and labeling information contained on this map or data on this report. Catawba County promotes and recommends the independent verification of any data contained on this map/report product by the user. The County of Catawba, its employees, agents, and personnel, disclaim, and shall not be held liable for any and all damages, loss or liability, whether direct, indirect or consequential which arises or may arise from this map/report product or the use thereof by an person or entity.

Disclaimer • Privacy/Security Notice

http://www.gis.catawba.nc.us/website/Parcel/parcel\_main.asp?Cmd=identify&xx=134777... 4/15/2008



Re: [Fwd: Re: Draft #1 Special Metal Facility Report] Sgot OS left Except Tmonth Sgot OS left Exception as Alum Jones sill histed as Alum Jones sill histed as Blum Jones Jammy 39 Pet. Enur. Energy Co order Subject: Re: [Fwd: Re: Draft #1 Special Metal Pacility Report] From: Brent Burch <Brent.Burch@ncmail.net> 22 Date: Tue, 19 May 2009 09:36:47 -0400 To: Steve Barron «Steve Barron@ncmail.net> CC: Sean Morris «sean.morris@ncmail.net> Steve, The report looks good, but as Sean has noted it needs some additional descriptions in some places. For each of the violations dealing with training and contingency plan issues, we need to include how long the person(s) involved have been in their position or how long the contingency plan has needed to be updated. I also need additional to see evidence to show that the facility is in fact an LQG. Having tonnage totals from 2007 and them signing a statement that they are an LQG won't cut it. Do we know if they were an LQG in April/May of 2009? How did we or do we prove that? 4-7-09 4659× Doos 1485 8-6400 p Doos Apil 7 04 9 Steve Barron wrote: BB 715 th Sum Sean's comments are attached.. I will include in Draft #2, which would also have any of your comments.. inscrim 5/13/09 Thanks.....S. Barron Correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties 3 Partal Dun lus udge generation at Us POTO TANK Subject: RE: Draft #1 Special Metal Facility Report From: "Morris, Sean" <a>sean.morris@ncdenr.gov></a> Date: Thu, 14 May 2009 09:20:33 -0400 To: Steve Barron < Steve.Barron@ncmail.net> To: Steve Barron < Steve Barron@ncmail.net> Comment #1: You may want to add why the employees who did not have job descriptions are required (Bobbie and Willie). Also may want to list the actually manifests that the employees signed. May want to specify that the employees did not attend annual training instead of saying that that employees did not have documented annual documentation violation is different then not attending training. training. The = 5360 4 Comment #2: May want to specify why the contingency plan was not up to date. Comment#3: I know they will ask why hazardous waste was exposed to the elements. May want to state that D005 hazardous waste residues were observed on the outside of the containers and on the concrete pad around the containers. There were not any controls in place to minimize the possiblity of the waste residues from migrating to nearby soils. Comment#4: Again if this goes to enforcement you will be getting all kinds of questions about the violations. Why were the satellite areas not under the control of an operator (outside of the faiclity, behind the building in an area that is not frequently visited on a daily basis). The same with describing why the container was not closed (container was not properly connected to the baghouse discharge unit, A small gap was observed, see pic?) Also give details on why aisle space was not adequate. Comment#4: Violations 6%7 have the wrong NCAC citation. It should be changed from 15A NOAC 13A 0 .0110. The report looks good to me just threw out some suggestions. Sean Morris - Sean.Morris@ncdenr.gov Environmental Senior Specialist North Carolina Dept. of Environment & Natural Resources Division of Waste Management - Hazardous Waste Section 610 E. Center Ave., Suite 301 Mooresville, NC 28115 Ph: 704.663.1699 Fax: 70 Fax: 704.663.6040 E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties From: Steve Barron [Steve.Barron@ncmail.net] Sent: Wednesday, May 13, 2009 6:52 PM 3000 \$1 To: Morris, Sean + Shop floor Sit fee Adrew Apput & Dum PNNval Ready Non 1 of 2

Subject: Special Metals - audit From: Hewitt Linyard <hlinyard@smwpc.com> Date: Mon, 18 May 2009 14:35:04 -0400 To: <Steve.Barron@ncmail.net>, <Sean.Morris@ncmail.net>

#### Gentlemen:

Just a note to let you know we began correcting a number of our issues the day after your Wednesday visit last week. I was away from the plant all day Friday, and most of today. I plan to provide a follow-up memo with documentation in a day or two. I didn't want you to think we were ignoring this. Thanks,

Hewitt Linyard - QA & Continuous Improvement Manager Six Sigma Black Belt Special Metals Welding Products Company 1401 Burris Rd. Newton, NC 28658 USA <u>hlinyard@smwpc.com</u> 828-695-2755 fax 828-465-3447

This document has been scanned by Special Metals Corporation for viruses and inappropriate content. It contains information intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. Special Metals Corporation, 3200 Riverside Drive, Huntington, WV 25705, USA, www.specialmetals.com



North Carolina Department of Environment and Natural Resources William G. Ross Jr., Secretary Michael F. Easley, Governor

> **DIVISION OF WASTE MANAGEMENT** HAZARDOUS WASTE SECTION

FACILITY INSPECTION REPORT

Alan Jones, Plant Engineer

**1. Facility Information:** 

13 Mpy 29 April 21, 2008-5 W/SM 828-465-2352 Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 NCD 980 841 951, Large Quantity Generator

2. Facility Contact:

3. Survey Participants: Alan Jones, Stephen Barron

**Date of Inspection:** 4.

April 16, 2008 / 3mil 08 10 Mm

To determine compliance with 40 CFR 260-279 **Purpose of Inspection:** 

#### **Facility Description:**

Hawfunnel 257255

Somo

201 New left

- The facility manufactures welding rods and products.
- The facility was inspected as a Large Quantity Generator.
- The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste annually.
- There are approximately 75 employees at this facility.
- The nearest private residence is approximately 500 yards from the facility.
- The facility is on city water and sewer. They have a NPDES permit.
- The facility consists of one manufacturing building.

#### 7. Waste Type:

- D005 Barium solid and liquid waste is the major waste stream.
- They ship in 55 gal drum containers and occasional metal roll off containers.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115

Phone: 704-663-1699 \ FAX: 704-663-6040

Page 1

9,000 3m

Ser Sem copies 8. Areas of Inspection: Manifests Manifests where inspected and found to be correct. Signed delivery copy included. 11-0X 59061 Land Disposal Restrictions included. Manifest completed correctly. 7 Drummed hazardous waste shipments are made approximately monthly. Metal roll offs are shipped annually. 9600 Transporter: Envirite of Ohio OHD 980 568 992 · Envirite of Ohio OHD 980 568 992 TSD: By Bobby Cutoe Weekly Inspections Weekly inspections documents were reviewed. Inspections are being performed and documented correctly. Training Facility personnel are completing classroom training on the subject of 0 hazardous waste procedures. Three employee job descriptions are documented correctly for t employees handling hazardous waste. 200 Font Annual training of these employees is taking place. Last training date was 0MAY07. 5/27/08 mergency Preparedness The facility has system for notification of employees in the case of a fire 0 or emergency. Emergency coordinators are assigned, trained. Correct address information was documented. Emergency equipment is mapped and maintained. There has not been a major emergency at this facility. 0 Dum (month The facility has only limited internal emergency response capabilities, and 0 relies heavily on outside emergency response agencies. ADT completes monthly fire sprinkler inspections. 0 Fire extinguishers are checked monthly. Key employees carry radios./ Cul Ph 0 Y85-3 610 East Center Avenue, Suite 301, Mooresville, North Cardlina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

Page 2

10823

No. 1 Ada 1 April should be a start of the start of Contractor Reported Jacklage Jo Smil THE MADE AND AN ADDRESS OF A DECK s con sale in mostly introducing the of and the set and part of W.C - Open B

- **Contingency** Plan
- 23 mg 08 The facility has not completed and documented arrangements with update will Ala local emergency facilities.

Sould no

- Their Contingency Plan was located on site.
- All emergency coordinator information was listed and was correct
- All emergency equipment is indicated in the plan.
- Evacuation routes were included.

**Biennial Report** 

- The facility's last Biennial Report was submitted on 28MAR08 0
- The annual RCRA fees were paid on 13AUG07: 0

Waste Minimization Plan

The Waste Minimization plan was located on site and was reviewed. rom last time

Accumulation Areas

- There were 6 satellite accumulation areas at the facility.
- The satellite accumulation area consisted one closed head 55 gal. 0 container.
- Containers were labeled correctly.
- Containers were closed.

ous Waste Storage Areas:

There was one hazardous waste storage area at the facility located at the flell phone By Boby Rear Pad area.

For In

Blue phal

It held / containers of D005 waste.

The containers were properly labeled and dated.

There was proper aisle spacing.

No leaks or spills were present. Burn Srely

There is also one 8' x 10' x 8' deep inground FLUX PIT located on the 0 west side of the building the collects water from the manufacturing machines. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. The facility utilizes Tuesday To Wellen Shamrock vacuum truck.

Universal Waste/ Used Oil

The facility utilizes GE green fluorescent tube lamps which MSDSs - Sochim Vayour Shapped indicated are non-hazardous. This facility has Used Oil stored on the Rear Pad. Storage is in 55 gal. containers. The containers were properly labeled. No leaks or spills were present. Used Oil is recycled.

610 East Center Avenue, Suite 301, Moorezville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040



Subpart BB/CC/J

• None at this facility

#### 9. Site Deficiencies & Required Actions:

#### 1) 40 CFR 265.37 Arrangements with local authorities.

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

Special Metals Welding Products is in violation of this regulation in arrangements with local emergency authorities have not made or documented.

Special Metals Welding Products must make and document arrangements for services with emergency authorities and contractors.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

Page 4

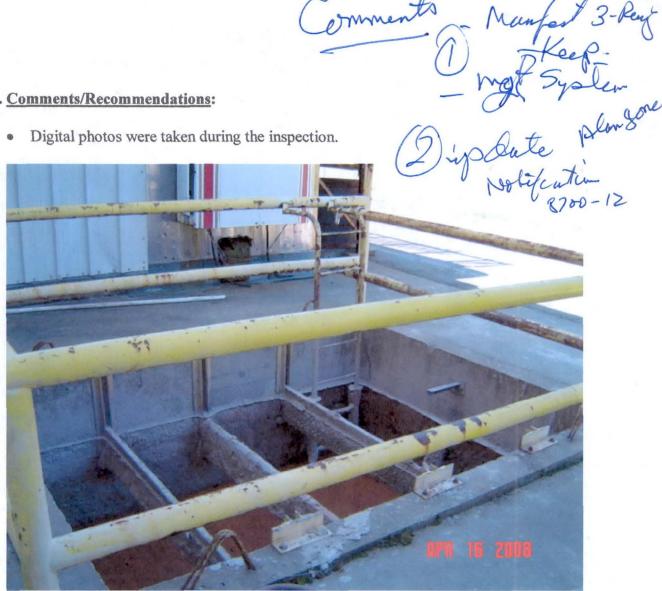
Note that we allow Principally as a statistic of the representation

Robins Agail 48-09

Jumos fl

#### 10. Comments/Recommendations:

Digital photos were taken during the inspection. .



Comments

FLUX PIT D005 Waste Solids/ Water to POTW

3. - HAB limbe Parl Need Roof.

Stephen H. Barron **Environmental Senior Specialist**  Date

cc: Facility **MRO** Files Brent Burch, Western Area Compliance Supervisor Central Office Files

> 610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040 Page 5

Subject: RE: Draft #1 Special Metal Facility Report From: "Morris, Sean" <sean.morris@ncdenr.gov> Date: Thu, 14 May 2009 09:20:33 -0400 To: Steve Barron <Steve.Barron@ncmail.net>

Comment #1: You may want to add why the employees who did not have job descriptions are required (Bobbie and Willie). Also may want to list the actually manifests that the employees signed. May want to specify that the employees did not attend annual training instead of saying that that employees did not have documented annual training. The documentation violation is different then not attending training.

Comment #2: May want to specify why the contingency plan was not up to date.

Comment#3: I know they will ask why hazardous waste was exposed to the elements. May want to state that D005 hazardous waste residues were observed on the outside of the containers and on the concrete pad around the containers. There were not any controls in place to minimize the possiblity of the waste residues from migrating to nearby soils.

Comment#4: Again if this goes to enforcement you will be getting all kinds of questions about the violations. Why were the satellite areas not under the control of an operator (outside of the faiclity, behind the building in an area that is not frequently visited on a daily basis). The same with describing why the container was not closed (container was not properly connected to the baghouse discharge unit, A small gap was observed, see pic?) Also give details on why aisle space was not adequate.

Comment#4: Violations 647 have the wrong NCAC citation. It should be changed from 15A NCAC 13A .0102 to .0110.

The report looks good to me just threw out some suggestions.

North Carolina Public Records Law and may be disclosed to third parties.

From: Steve Barron [Steve.Barron@ncmail.net]
Sent: Wednesday, May 13, 2009 6:52 PM
To: Morris, Sean
Subject: Draft #1 Special Metal Facility Report

SM

For your review ..

Thanks.....S. Barron

--

Correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

### **Inspection Notes**

•

ŀ

	Date: 5/13 Site Name: SPECIAL ME	
	Address:Co	unty:
	Contact / Phone #:	
	Participants: <u>HEWITT LINYARO - QA MANAGEN</u> BOBBY CATOR - PROCESS ENGI	MTEA
	Weather Conditions:	
	Notes: <u>APA. 16 2008 - LAST INSPECTION</u>	
	7/2/08 12h 507 Aggeox 10,500 p. 7 pm 6163 p	· · · · · · · · · · · · · · · · · · ·
	60n 3088 p 20n 1198 p 11/14/08 22n 110 g	
12 9	<u>30n 2400p 4,800p 10n 800p</u>	
1/221	<u>lon</u> <u>9 Ion 700p</u> <u>4 0n 2800p 41,900p</u> <u>2 0n 1400p</u>	•
4/0/09	30 1659 	
slolon 5 pturs		+ PROFILES
Coolune W	<u> </u>	· UNIVERSAL WOSTE PENEPTI · BIENNIOL
KF.X RUP	of e	
	FUR DRAW PROF TO POTW	
	$\mathbf{l}$	SEAN Moris

				- - -	•
Photographs (time and locations	):			-	
Documents Copied:					
Site Drawing:				]	
		• 			
Referrals: NC DWQ-Aquifer Protection NC DWQ-Surface Water Protection NC DAQ Solid Wasts Section			· · · · · · · · · · · · · · · · · · ·	- ', -	
Solid Waste Section EPA County Agency Other				-  	
·	•				

Integrated Contingency Plan

\* \* 8 \* 2 South of the second second

### INTEGRATED CONTINGENCY PLAN

### For

### SPECIAL METALS WELDING PRODUCTS CO. NEWTON, NORTH CAROLINA

Guidelines For Emergency Response and Cleanup Measures For Releases of Hazardous and Non-Hazardous Substances Into Air, Soil, Surfacewater, and Public Sewer System

> 1401 Burris Road Newton, North Carolina 28658

> > 828-465-0352

Integrated Contingency Plan

### TABLE OF CONTENTS

### **SECTION I -- PLAN INTRODUCTION ELEMENTS**

- 1. Purpose and Scope of Plan Coverage
- 2. Current Revision Data
- 3. General Facility Information

### **SECTION II -- CORE PLAN ELEMENTS**

- 1. Discovery
- 2. General Response
- 3. Specific Responses for Release Scenarios
- 4. Termination and Follow-Up Actions

### **SECTION III -- ANNEXES**

- 1. Facility and Locality Information
- 2. Notification
  - Emergency Coordinators
  - Plant Personnel
  - State and Local Agencies with Designated Response Roles
  - Local Authority for Evacuation
- 3. Incident Documentation
- 4. Training and Exercises/Drills
- 5. Response Critique and Plan Review and Modification Process
- 6. Prevention
- 7. Emergency Equipment

Integrated Contingency Plan

### **SECTION I -- PLAN INTRODUCTION ELEMENTS**

#### Purpose and Scope of Plan Coverage

The purpose of this <u>Integrated Contingency Plan (ICP)</u> is to provide written guidelines for responding to various emergency conditions that could occur within or near the Special Metals Welding Products Plant on Burris Road, Newton, North Carolina, involving liquid or solid ingredient chemicals, flammable gases, non-flammable gases, oil, and other chemical substances.

The ICP is focused primarily on the actions to be taken by the Emergency Coordinator, but ALL plant personnel involved in chemical processing, waste handling, or any form of emergency response activity must review, rehearse and understand these guidelines.

As no emergency – by definition – follows an exact script, no two emergency responses will be the same, nor follow the same script, either. Therefore, this document presents *guidelines* for actions to be taken for fore-seeable emergencies and prepares all personnel to respond quickly and safely, report to local authorities, clean up, and get back to normal operations again as soon as possible.

The Plant does not maintain a HazMat Response Team or a Fire Brigade. Therefore, the guidelines herein focus on (1) Making sure all Company personnel are safe, (2)That the size and scope of the emergency is controlled and minimized to the extent it can be done safely, and (3) Utilizing outside resources such as the Fire Department, the Catawba County HazMat team, and/or emergency clean-up contractors as needed.

The intent of this Integrated Contingency Plan is to be broad enough in scope to address the (overlapping) contingency plan requirements of RCRA (Hazardous Waste Treatment, Storage, and Disposal), the EPA's Oil Pollution Prevention Regulations (SPCC), the OSHA (HAZWOPER) regulations, the Clean Air Act (Risk Management Plans), and the requirements of the NC-DEHNR for Stormwater Pollution Prevention and NPDES (waste-water pretreatment) standards.

Note: The ICP applies to emergencies. Spills of most dry chemicals during normal plant processing generally will <u>not</u> be emergencies. The person responsible for making a mess is also responsible for cleaning it up using normal equipment, and for following routine procedures for disposal of waste material.

Integrated Contingency Plan

#### Current Revision Data

This section documents all revisions to this Plan including changes made in this section and will be maintained as a permanent part of the Contingency Plan.

Revised Section	<b>Revision Date</b>	Revisions
Section B	10-1-87	Adding Harold Steven
		Winnell
Emergency Coordinator		Adding Stephen B.
Listing		Schooley; Deleting James
		C. Judd
Section K	10-1-87	3 Revisions
Section B	4-23-96	Update Section B
		Emergency Coordinators
Emergency Coordinator	7-25-00	Name Change
Listing		
All	4-27-06	Company name change;
		coordinator name change;
		general revisions; add
		emergency responders.
Entire Document	May, 2008	Conversion of entire
		document to follow
		National Response Team's
		Integrated Contingency
		Plan Guidance, ref: Federal
		Register, June 5, 1996

#### **General Facility Information**

FACILITY NAME:		ETALS WELDING PRODUCTS COMPANY of Precision Castparts Corporation
OPERATOR:		HUNTINGTON ALLOYS A SPECIAL METALS COMPANY 3200 Riverside Drive Huntington, WV 25705
PHYSICAL ADDRE	ESS:	1401 Burris Road, Newton, Catawba County North Carolina 28658
LATITUDE/LONGI	TUDE:	35.686581, -81.196861
SIC CODE:		3356 (Roll, Draw, & Extrude Nonferrous)
NAICS CODE:		331491 (Nonferrous metal (except copper and ruding)

Integrated Contingency Plan

TYPE OF BUSINESS: Manufacturing flux-coated welding electrodes and bare filler metal for welding. The manufacturing operations include blending, mixing, drying, pressing, extruding and baking various flux compositions; rolling, drawing, cleaning, and annealing stainless steel and high-nickel alloy compositions.

GENERATOR'S US EPA ID No.: NCD98084195

STORMWATER DISCHARGE PERMIT CERTIFICATE OF COVERAGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM STORMWATER GENERAL PERMIT NCG030000: NCG030314

KEY CONTACT FOR PLAN DEVELOPMENT AND MAINTENANCE:	Alan E. Jones – Plant Engineer
PHONE NUMBER FOR KEY CONTACT:	828-465-0352 Ext. 211
MAIN TELEPHONE NUMBER:	828-465-0352
MAIN FAX NUMBER:	828-464-8993

Integrated Contingency Plan

### SECTION II -- CORE PLAN ELEMENTS

### Discovery

Any person in the plant who observes a release or potential release – whether sudden or non-sudden – of any significant hazardous material or waste is to notify his supervisor who will in turn contact the Environmental Emergency Coordinator or one of the Alternate Environmental Emergency Coordinators.

The decision to implement the Contingency Plan depends upon whether or not an imminent or actual incident could threaten human health or the environment.

The Emergency Coordinator has the duty to make this decision. The Emergency Coordinator is authorized to commit the resources of SMWPC, including emergency purchases, as needed, in implementing the Contingency Plan in response to an accident.

Depending on the degree of seriousness, the following potential emergencies might call for implementation of the Contingency Plan. The purpose of this section is to provide <u>guidance</u> to the Emergency Coordinator by providing decision-making criteria.

### A SPILL or MATERIAL RELEASE will require activation of the Contingency Plan if:

- 1. A hazardous material is spilled in a location where it can not be immediately contained and could contaminate surface or groundwater, soil, or the atmosphere.
- 2. The spill could result in the release of flammable liquids or vapors creating a fire or explosion hazard.
- 3. The spill could result in the release of toxic vapors which endanger human health and/or the environment.

#### A FIRE will require activation of the Contingency Plan if:

- 1. The fire could cause the release of toxic fumes.
- 2. Use of water or water & chemical fire suppressant results in contaminated run-off off-site.
- 3. A fire exists and if the fire spreads, it could ignite materials at other locations at the site or cause heat-induced explosions.
- 4. The fire could spread to off-site areas.
- 5. Use of water or water and chemical fire suppressant could result in contaminated run-off.

Integrated Contingency Plan

#### An EXPLOSION will require activation of the Contingency Plan if:

- 1. An imminent danger exists that an explosion could occur, resulting in a safety hazard due to flying fragments or shock waves.
- 2. An imminent danger exists that an explosion could ignite other hazardous waste at the facility.
- 3. An imminent danger exists that an explosion could result in release of toxic material.
- 4. An explosion has occurred.

#### **General Response**

#### Notification

The Emergency Coordinator will assess possible hazards to human health and/or the environment as a result of these releases, fires, and explosions and subsequently, if necessary, notify all affected or potentially affected facility personnel by public address system or by the building evacuation alarm. The nature and extent of the incident will dictate the number, type, and order in which appropriate Federal, State, or local agencies, and off-site emergency response agencies will be notified. See Section III – Annexes, State and Local Agencies with Designated Response Roles

#### **Identification of Hazardous Wastes**

The Emergency Coordinator will immediately identify the character, source, amount and extent of any released materials. The initial identification method will be to utilize visual analysis of the material, the containers, or process machinery, and the Coordinator's knowledge of the location of the release. If, for some reason, the released material cannot be identified, samples may be taken for laboratory analysis.

#### Assessment

The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment. These effects may include toxic, irritating, or asphyxiating gases that are generated, or the effects of hazardous surface water run-off from water or chemical agents used to control fire or heat-induced explosions.

#### **Procedural Guidelines**

In the event of a major emergency involving a hazardous material, the following general procedures are to be used for rapid and safe response and control of the situation.

1. If an employee discovers a leak which cannot be stopped by immediate action (turning off pumps, setting drum upright, etc.) by the employee before it becomes a significant release, he is to immediately report it to his foreman or supervisor.

Integrated Contingency Plan

- 2. The foreman or supervisor will observe the spill and contact the Emergency Coordinator, supplying him with the following information:
  - The name and position of the person reporting the emergency.
  - Identity of the materials included.
  - The approximate quantity spilled.
  - The specific location of the emergency.
  - The potential of fire and/or explosion.

This information will help the Emergency Coordinator to assess the magnitude and potential seriousness of the spill or release. If the accident is determined to lie within the Company's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary in-plant personnel. The initial response to any emergency will be to protect human health and safety, and then the environment. Identification, containment, treatment and disposal assessment will be the secondary response.

If the accident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies, starting with 911. Evacuation of all potentially affected plant areas will be initiated as soon as possible.

During the emergency, the Emergency Coordinator Must:

- Take measures to ensure that the incident does not recur or spread to other hazardous waste at the facility. Stop operations if necessary.
- Monitor equipment for leaks, pressure build-up or other potential problems in operations that are shut down.

### **Containment and Clean-Up Guidelines**

The following procedures for containment and clean-up are guidelines to be followed in the event of a release of *hazardous material*. Additional or alternate procedures may be used if in the judgment of the coordinator the alternate procedures offer equivalent or better protection of human health and the environment. All clean-up and containment procedures are to be directed by the Emergency Coordinator or his alternate.

#### Solid Materials

- 1. Transfer any material from a leaking drum into an approved drum.
- 2. Shovel and sweep any released material into an approved drum.
- 3. Mop the floor to remove any residue present, and dispose of the mop water along with the solid waste.

#### Liquid Materials

If a drum is leaking:

- 1. Position the drum so that the hole is the highest point of the drum to stop further leaking.
- 2. Place the saturated absorbent in an approved drum.

Integrated Contingency Plan

3. Store this contained material in a safe place and contact disposal firm.

#### Specific Responses for Release Scenarios

#### Natural Gas Leak – Outdoors

Key Guideline: Keep the leaking gas outside of the building, if possible, by shutting off supply air fans, and closing all doors near the point of the leak. Do not switch any electrical devices, including ordinary light switches, ON or OFF if you smell gas where the switch is located (a spark could ignite the gas).

#### Natural Gas Leak - Indoors

Immediately turn off the gas cock at the point of the leak, if it is safe to do so. Do not switch any electrical devices, including ordinary light switches, ON or OFF if you smell gas where the switch is located (a spark could ignite the gas).

If electrical power needs to be turned off, go to the circuit breaker or distribution panel for the equipment/area, and turn off the breaker(s).

If there is fire at the point of the leak, retreat to the nearest section control valve, or to the main gas safety shut off valve at Column A-3, and shut off the natural gas supply.

Call 9-1-1 to get the Fire Department on the way just in case the leaking gas ignites.

#### **Cooling Water Leak – Underground**

Cooling tower water is treated with microbiocide (isothiazolinones in a caustic solution) and scale inhibitor (phosphate/molybdate/tolyltriazole in sodium hydroxide solution) that are environmental concerns. Normal concentration of these chemicals in cooling water is under 100 ppm.

Turn off the cooling tower pumps as soon as possible, to minimize ground water contamination. If the estimated volume lost exceeds 1000 gallons, contact NCDENR, Division of Water Quality. See Section 9.

#### Hydrogen Tank/Line Leak

The hydrogen tank is equipped with a valve that slams shut if there is excessive flow, by sensing the flow of liquid hydrogen at cryogenic temperature, so a broken pipe should result in a very short duration leak.

If the leak is smaller and continuous, first and foremost make sure there are no sources of ignition. Do not switch any electrical devices, including ordinary light switches, ON or OFF near where the leak is located (a spark could ignite the hydrogen).

Trip the Emergency Shut-Off valve with the handle located on the fence beside the hydrogen tank.

Call 9-1-1 to get the Fire Department on the way just in case the leaking gas ignites.

Integrated Contingency Plan

#### LPG Tank or Cylinder Leak

If the leak is small and continuous, first and foremost make sure there are no sources of ignition. Do not switch any electrical devices, including ordinary light switches, ON or OFF near where the leak is located (a spark could ignite the Liquified Petroleum Gas (LPG).

If the leaking cylinder can be moved safely outdoors, do so, to reduce the fire hazard inside the building.

If the cylinder is still on the fork truck, consider the risk of igniting a fire by starting the fork truck engine versus leaving the leaking cylinder where it is found, and keep all the building exhaust fans running.

Call 9-1-1 to get the Fire Department on the way just in case the leaking gas ignites.

#### **Powdered Metal Fire**

Powdered metals may have some or all of these characteristics:

- Putting water on these metallic powders creates heat, and/or causes self-ignition.
- If the chemicals are already involved in a fire, spraying them with water may cause them to burn more intensely, i.e. the water supplies oxygen.
- If fine-mesh particles of the metallic powders become airborne, they may burn rapidly or explode.

If metallic powder chemicals are involved in a fire, use only the Class D fire extinguisher or sand to attempt to put out the fire. DO NOT USE WATER on any container marked with a:  $\mathbf{W}$ 

#### **Dry Chemical Spill – General**

Because of the low hazard level of most dry chemicals in the Plant, most spills of dry chemicals will not create a hazardous waste clean up situation.

#### Liquid or Dry Chemical Spill Into Sewer – "Slug Spill"

The first person to become aware of a wastewater 'slug' discharge or spill is to take the following actions:

1. In the event of a 'slug' of chemicals – whether an unusually large amount of a chemical normally discharged into the categorical sewer, or any quantity of oil or other chemical – reaching and draining into the sewer system, immediately contact the City Wastewater Treatment Plant at 695-4313, Public Works After-Hours Emergency at 465-7430 or Jim Rumley-Pretreatment Coordinator at 217-4456. Inform them of the location of discharge, time of discharge, type of material, volume and corrective actions taken.

- 2. Prevent further material from entering the sewer if possible.
- 3. Contact the Emergency Coordinator and report the following:

Integrated Contingency Plan

- a) Your name and position.
- b) The material spilled.
- c) The approximate quantity spilled.
- d) The approximate time that the spill occurred.
- e) The specific location of the spill.
- f) Actions taken to report the spill and to contain it and to clean it up.

#### Sodium silicate

Sodium silicate may be cleaned up by shovel and squeegee, and placed into normal trash dumpsters. Floors may be hosed clean with hot water.

#### Borax pre-coat

Borax pre-coat is a very low hazard chemical: the dry chemical may be swept up and disposed of in regular trash. When mixed with water, collect in drums or tanks and arrange for disposal with a TSDF as non-hazardous waste.

#### Barium-containing chemicals, sludge

Shovel up spills and place in 55-gallon drums, for routine disposal along with other barium-bearing waste (Baghouse Dust, Liquid Barium (from floor trench or from settling pit), and Solid Barium (from electrode press and from brushing machine baghouse)).

Spills of barium-containing material onto the ground outdoors larger than the Reportable Quantity must be reported to the EPA/NCDENR.

#### Alkaline cleaner

Spills or leaks of alkaline cleaner should be shoveled, scooped, mopped, or vacuumed up, and the collected material placed in the soap cooker outdoors. If any amount of the material is washed into the sewer system, follow the Slug Spill procedures above.

Avoid the use of dry absorbents such as Oil Dri, and use a minimal number of absorbent socks, to reduce the amount of solid waste created. Saturated absorbents may be disposed of in the plant trash dumpster.

#### Spent alkaline cleaner & soap lube

'Spent' alkaline cleaner -- alkaline cleaner that is saturated/loaded with drawing lubricant ('soap') – that has spilled indoors should be collected and placed into the soap cooker outdoors.

Integrated Contingency Plan

Material that has spilled outdoors must be absorbed, channeled, ponded/dammed, and collected to prevent it from entering the ditches and/or the catch basin and stormwater drainpipes that lead to the branches of McLin Creek.

#### X-ray chemistry

Not hazardous material in the quantities available on-site at Special Metals. Any collected liquid from a spill or leak may be disposed of in the soap cooker.

#### Etchants - Nitric acid, peroxide

Use proper protective gear, including safety goggles and appropriate gloves when handling any etching chemical.

Use limestone to neutralize acids; use water to dilute hydrogen peroxide

#### **Glycol (from chiller)**

Cover any floor drain to prevent run-off from reaching the City sewer. Collect the material in drums or tanks, and arrange for disposal.

#### **Oil Drum Punctured/Spilled/Leaking**

Roll or set the drum to stop the leak.

- a) Position the drum so that the hole is the highest point of the drum to stop further leaking.
- b) Place the saturated absorbent in an approved drum.
- c) Store this contained material in a safe place and contact disposal firm.

#### **Compressed Gas Cylinders**

Beware of compressed gas cylinders that have had the valve broken off, or that have been punctured in any way: The will instantaneously become rockets due to the sudden release of high-pressure gas.

If they are involved in a fire, they should be kept cool with a stream of water from a fire hose, to prevent overpressurization from overheating.

#### Hydraulic Oil – Pressurized Spray

Keep far away from the location of the leak, to avoid hypodermic penetration of the liquid stream into arms, hands, etc.

Hit an emergency stop button, or pull the main power switch to the hydraulic pump to shut of all electrical energy to the hydraulic pump.

Integrated Contingency Plan

#### Termination and Follow-Up Actions

Following the emergency, the Emergency Coordinator must:

- Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water or other material resulting from the discharge.
- Ensure that clean-up procedures are completed and emergency/clean-up equipment is again ready for use before resuming operations in affected areas. After an emergency event, and before operations are resumed, an inspection of safety equipment will be conducted.
- Complete the "Hazardous Waste Release Form" see Incident Documentation --Annex 4 of this Plan.

<u>Note on Reportable Quantity:</u> As called for in regulations developed under the Comprehensive Environmental Liability and Compensation Act of 1980 (Superfund), determine if the hazardous material released was a quantity equal to or greater than the reportable quantity as designated by the EPA or state authorities and which is listed under the Solid Waste Disposal Act, Clean Air Act, Clean Water Act, or TSCA.

• Perform the "Response Critique and Plan Review and Modification Process" procedures as directed in Annex 6 of this Plan.

Integrated Contingency Plan

### **SECTION III -- ANNEXES**

### 1. Facility and Locality Information

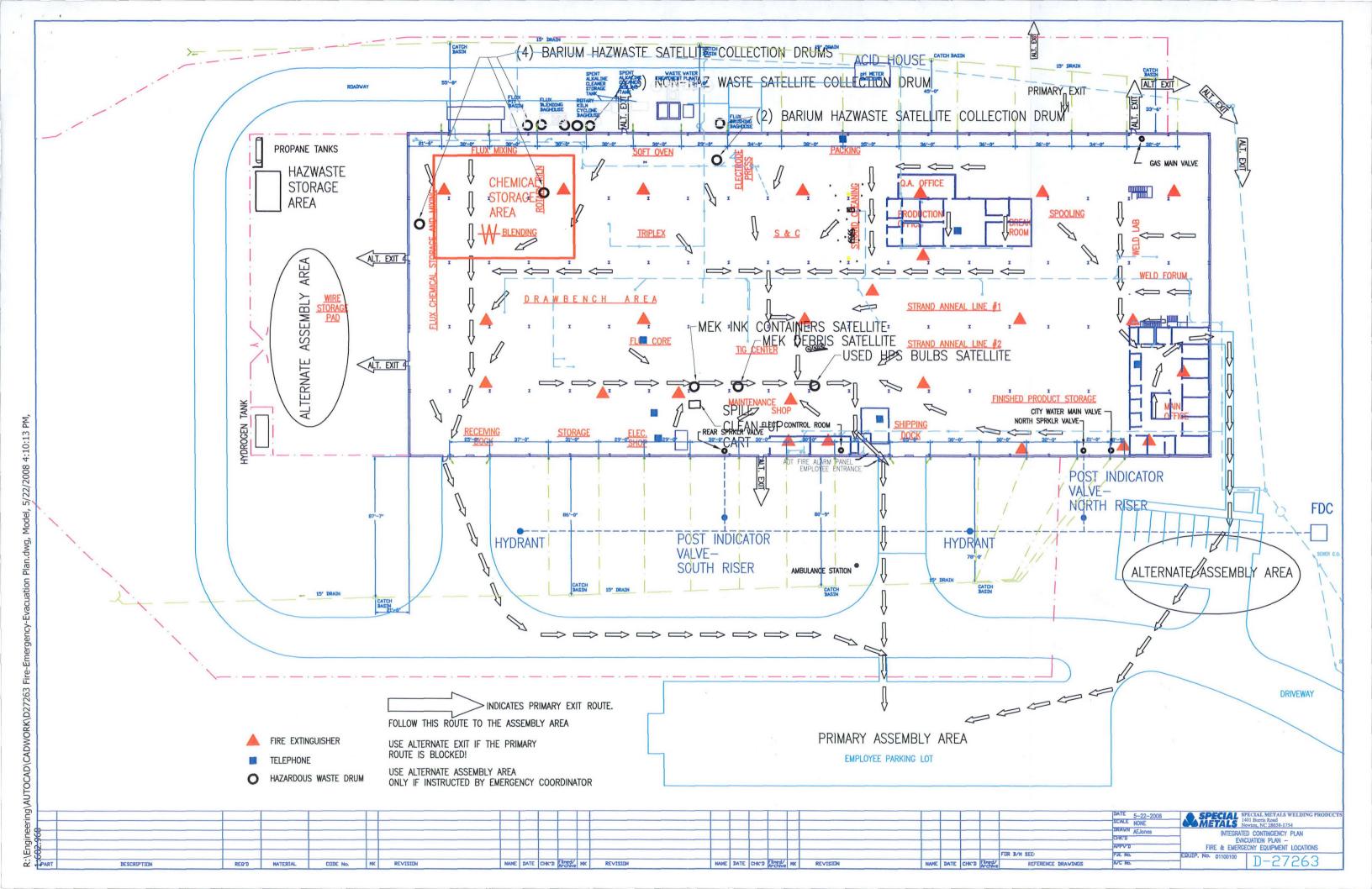
((maps, etc.))

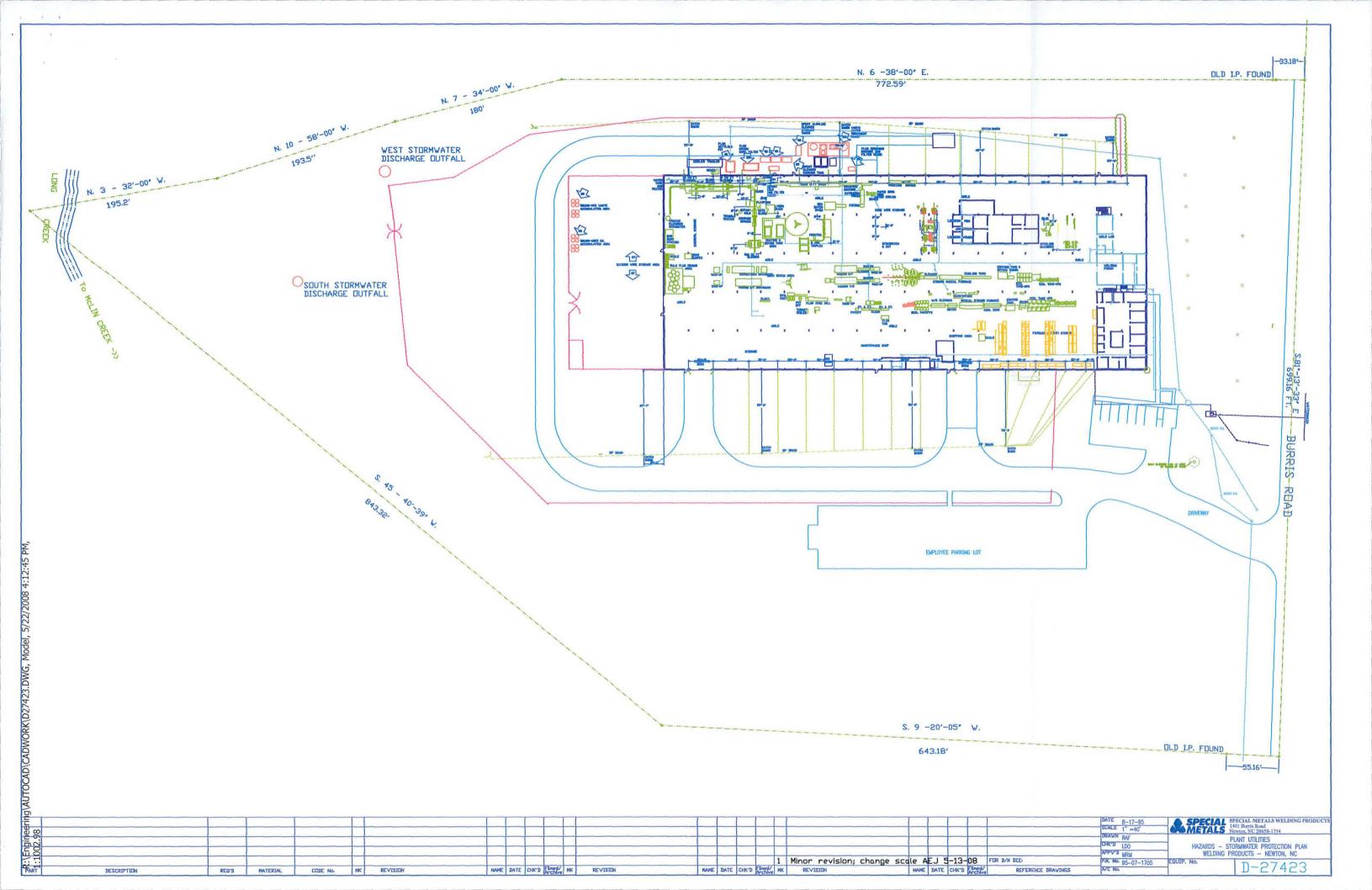
1 / f

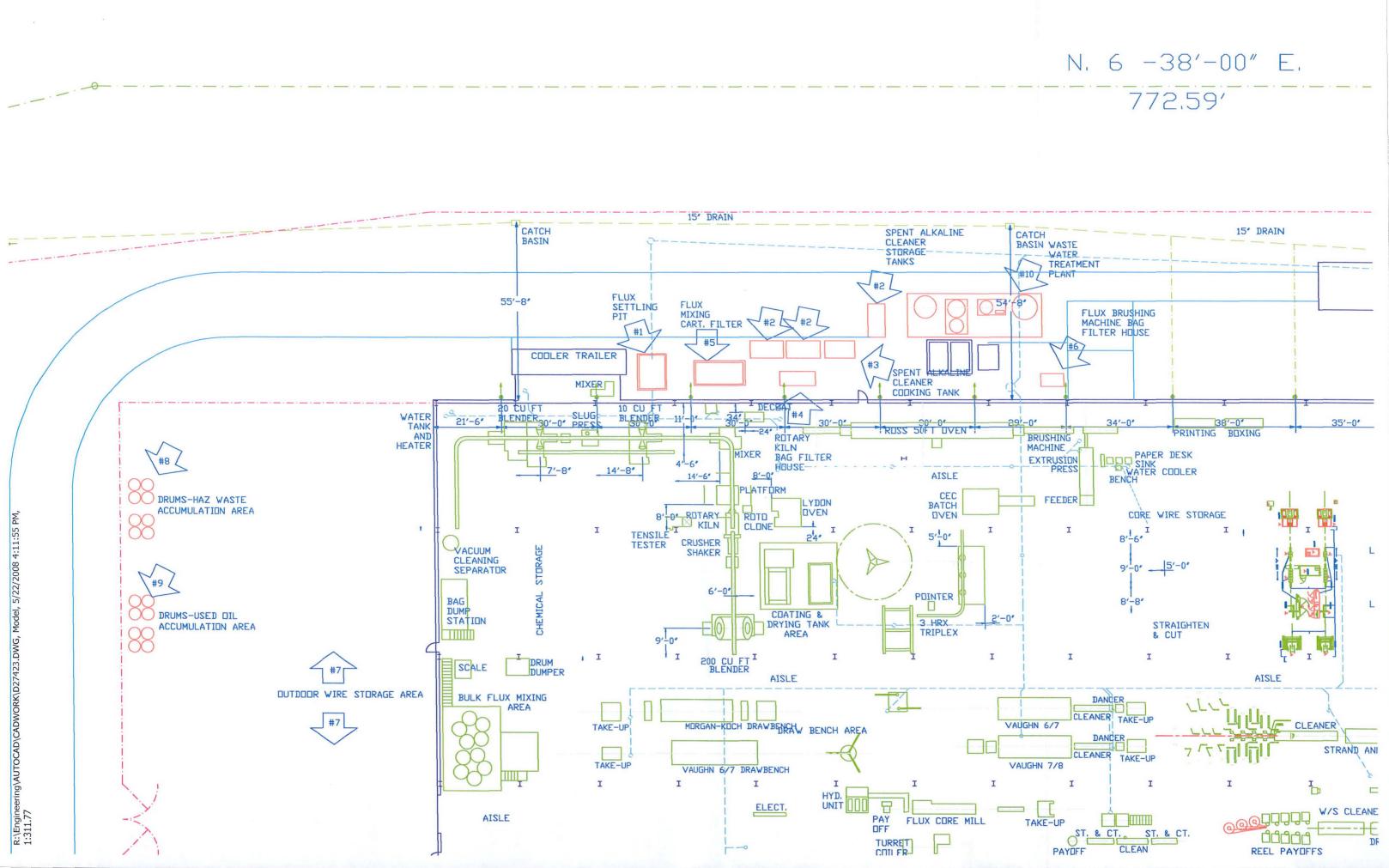
,

.

.







Integrated Contingency Plan

#### 2. Notification

ı

#### 2.1 Emergency Coordinators

The primary Environmental Emergency Coordinator is:

Steve Winnell 3641, 7<sup>th</sup> St. NE Hickory, NC 28601 (828) 324-1988

The Alternate Environmental Emergency Coordinators are:

1 <sup>st</sup> Alternate	Alan Jones 138 Paradise Lane Kings Mountain, NC 28086 704-739-9964
2 <sup>nd</sup> Alternate	Tom Dickerson - 335 Holland Drive Statesville, NC 28677 704-872-4292
<u>3<sup>rd</sup> Alternate</u>	Jeannie Martin • 1757 Castlewood Ct. Hickory, NC 28602 (828)-294-3408

#### When contacting an Emergency Coordinator:

- Attempt to notify a person who is in the plant first, using the order above.
- If none of the Coordinators are in the plant, contact one of the Coordinators at their home, following the order in the above list
- The Emergency Coordinator or Alternate can deputize other Company employees to assist them in the event of an emergency.
- The Emergency Coordinator or Alternate can commit the Equipment and resources needed to deal with an emergency.

Integrated Contingency Plan

) і 1

1

#### 2.2 Plant Personnel

(this tab section reserved for a list of all SMWPC-Newton personnel, with home addresses and telephone numbers)

Integrated Contingency Plan

с **3**.

.

.

#### 2.3 State and Local Agencies with Designated Response Roles

EMERGENCY	9-1-1
City of Newton Fire Marshall Mr. Dale Coffey 116 "A" Street Newton, NC 28658	828-695-4284 (cel) 828-217-2167
Catawba County Emergency Services (HAZMAT Team Mr. David Weldon - Coordinator (alt.: Ms. Shonda Hollis – Adminsitrative Asst. P.O. Box 389 Newton, NC 28658	<b>, LEPC)</b> 828-465-8233 (cel) 828-302-5139 828-465-8232
<b>City of Newton Police Department</b> Mr. Donald Brown – Chief P.O. Box 550 Newton, NC 28658	828-695-4306
City of Newton Water Treatment Plant (POTW) Mr. James Rumley – Pretreatment Coordinator Alternate Numbers: Public Works After-Hours Emergency Mr. Danny Sigmon Public Works Normal Hours P.O. Box 550 Newton, NC 28658	828-695-4313 828-695-4337 (cel) 828-217-4456 : 828-465-7430 828-695-4346 828-695-4310
Catawba Memorial Hospital Mr. Dale Greer – Safety Officer 810 Fairgrove Church Road Hickory, NC 28602	828-326-3592

STAT, Inc. – Chemical emergency spill clean-up, transportation and disposal services and equipment supplier Mr. Gary Sparts P.O. Box 1443 Lenoir, NC 28645

Integrated Contingency Plan

#### North Carolina Department of Environment and Natural Resources – Hazardous Waste Section, Division of Waste Management

.

Mr. Stephen Barron 610 East Center Avenue Mooresville, NC 28115

>

•

1

336-492-5714 (cel) 919-270-2186

Integrated Contingency Plan

) ι

ī.

#### 2.4 Local Authority for Evacuation

The Incident Commander is responsible for determining if any level of evacuation is necessary.

The Chief of the City of Newton Fire Department is designated as the Incident Commander for the purposes of this plan. The acting Emergency Coordinator will serve as temporary Incident Commander until arrival of the Fire Department on scene.

Integrated Contingency Plan

<u>،</u>

t

### 3. Incident Documentation

#### Hazardous Waste Release Form

Use this form to record data and actions taken when the Contingency Plan is implemented.

Date:		Emergen	cy Coordinator:	
Notifie	ed of release by:	Name	Position	
		At:	Time:	
Locati	on of release:			_
Relea	sed material(s) (sta	te quantity):		
ASSE	SSMENT OF HAZA	ARDS:		_
			Quantity:	
	Contamination of S	Sewer	Quantity:	
			Quantity:	
	Other		Quantity:	
	N-UP REPORT Describe actions t	aken:		
2.	Quantity of contan	ninated material	(soil or Water):	
3.	How was material	in (2) disposed o	of?	<u> </u>
4.	What equipment v	vas used in the c	lean-up?	
5.	Has this equipments storage area as st		, repaired, and placed back in its pro ingency Plan?	 per

Integrated Contingency Plan

× 1

.

1

## 4. Training and Exercises/Drills Records

Integrated Contingency Plan

• 1

### 5. Response Critique and Plan Review and Modification Process

Every actual event that requires actuation of this Contingency Plan shall be followed up with a critical examination of the event and whether the Plan was or was not effective. All deficiencies in the plan shall be addressed and the Plan modified as needed and then re-issued to all involved agencies and employees.

Integrated Contingency Plan

### 6. Prevention

а. , ,

Following the axiom that "Prevention is the best medicine", the Plant will operate and maintain the facilities in ways that will help avoid and/or minimize the impact of chemical-based emergencies.

The practices and principles found in a separate document, the Stormwater Pollution Prevention Plan, can be applied broadly to the types of fore-seeable emergencies outlined here as well as to those that relate to stormwater pollution.

**Integrated Contingency Plan** 

÷.

### 7. Emergency Equipment

To be prepared for chemical emergencies, an emergency equipment cart is kept in the Maintenance Shop. This cart contains the following items:

- 1. One bung wrench.
- 2. Two 40 pound bags of absorbent.
- 3. One large blade screwdriver.
- 4. One channel-lock pliers.
- 5. One crescent wrench.
- 6. One funnel.
- 7. One paint marker.
- 8. Two pair cloth gloves.
- 9. One square-end short handle shovel.
- 10. One 18" push broom.
- 11. One paint or white wash brush.
- 12. One roll of fiber tape.
- 13. Two rubber pads.
- 14. Two pair slip-on rubber boots.
- 15. One 10 quart galvanized pail.
- 16. Two pair black rubber gloves.
- 17. Two disposable protective suits.

An Overpack drum is stored on the rear storage pad.

Supplies are to be replenished immediately upon closure of each incident.

TO BB14 MM 09



North Carolina Department of Environment and Natural Resources Division of Waste Management

Beverly Eaves Perdue Governor Dexter R. Matthews Director Dee Freeman Secretary

#### **HAZARDOUS WASTE SECTION**

#### DRAFT #1 13MAY09 FACILITY INSPECTION REPORT

May 13, 2009

- 1. <u>Facility Information</u>: Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 NCD 980 841 951, Large Quantity Generator
- 2. Facility Contact: Hewitt Linyard
- 3. <u>Survey Participants</u>: Hewitt Linyard, Bobby Catoe, Sean Morris, Stephen Barron
- 4. Date of Inspection: May 13, 2009
- 5. Purpose of Inspection: To determine compliance with 40 CFR 260-279
- 6. Facility Description:
  - The facility manufactures welding rods and products.
  - The facility personnel agreed that the facility was to be inspected as a Large Quantity Generator.
  - There are approximately 75 employees at this facility.
  - The nearest private residence is approximately 500 yards from the facility.
  - The facility is on city water and sewer. They have a NPDES permit.
  - The facility consists of one manufacturing building.
  - The facility was last inspected on 16APRIL08, and received a Ticket Notice of Violation Docket # 2008-079. The prior inspection on 12APRIL06, also resulted in a Notice of Violation being issued.

#### 7. Waste Type:

• The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115

Phone: 704-663-1699 \ FAX: 704-663-6040

Page 1

annually. The facility generates about 3 to 4 drums per month of Barium waste or about 2,100 to 2,400 lbs. per month.

• They ship in 55 gal drum containers and occasional metal roll off containers.

#### 8. Areas of Inspection:

<u>Manifests</u>

• Manifests where inspected. The facility had difficulty supplying all manifests. Manifest management was not adequate.

- Signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste. (Violation #1).
- Land Disposal Restrictions included.
- The manifests inspected were completed correctly.
- Drummed hazardous waste shipments are made approximately every three month. Metal roll offs are shipped annually.
- o Transporter: Envirite of Ohio OHD 980 568 992
- o TSD: Envirite of Ohio OHD 980 568 992
- Weekly Inspections
  - Weekly inspections documents were reviewed.
  - Inspections are being performed and documented correctly.

#### • <u>Training</u>

- Not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training. (Violation #2).
- Employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan. (Violation #3).
- Hazardous waste annual training of some employees is taking place. Last training date was 27MAY08.

- Emergency Preparedness
  - The facility has system for notification of employees in the case of a fire or emergency.
  - Emergency equipment is mapped and maintained.
  - There has not been a major emergency at this facility.
  - The facility has only limited internal emergency response capabilities, and relies heavily on outside emergency response agencies.
  - ADT completes monthly fire sprinkler inspections.
  - Fire extinguishers are checked monthly.
  - Key employees carry radios and/or cell phones.
- <u>Contingency Plan</u>
  - The facility has completed and documented arrangements with local emergency authorities.
  - o Their Contingency Plan was located on site.
  - Emergency coordinator information was listed but was not correct. Updated Contingency Plan has not been submitted to local emergency authorities. (Violation # 4).
  - o All emergency equipment is indicated in the plan.
  - Evacuation routes were included.
- Biennial Report
  - o The facility's last Biennial Report was submitted on 28MAR08
- Waste Minimization Plan
  - The Waste Minimization plan was located on site.
- Accumulation Areas
  - There were 6 satellite accumulation areas at the facility.
  - Satellite accumulation areas within the facility consisted of one 55 gal. container. These containers were labeled correctly and were closed.
  - Satellite accumulation area at outside baghouse # 6.
    - Consisted of one 55 gal. container.
    - The container was labeled correctly.
    - Dust identified by Bobby Catoe as D005 Barium dust waste was observed outside of the container and on the baghouse pad.
    - The baghouse, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil. (Violation # 5).
  - o Satellite accumulation area at outside baghouse # 5.
    - The baghouse collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. The hazardous waste at this area exceeded 55 gals. of total hazardous waste. (Violation #6 first part)

- These containers of hazardous waste where not under the control of an operator. (Violation #6 second part).
- One container of hazardous waste was not closed. (Violation # 7).
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - It held 5 containers of D005 hazardous waste.
  - The containers were properly labeled and dated.
  - There was not adequate aisle spacing of containers of hazardous waste to allow unobstructed movement of personnel or safety equipment. (Violation #8).
  - Spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers. (Violation #9).
  - o The hazardous waste personnel have radios and/or cell phones.
  - There is also one 8' x 10' x 8' deep in-ground FLUX PIT located on the west side of the building the collects water from the manufacturing machines. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. Removal is scheduled to be completed this month.
- <u>Universal Waste/ Used Oil</u>
  - The facility utilizes GE green fluorescent tube lamps which MSDSs indicated are non-hazardous.
  - The facility stores Used Oil on the Rear Pad. Storage is in 55 gal. containers. Used Oil is recycled. No containers where present during the inspection.
- <u>Subpart BB/CC/J</u>
  - None at this facility

#### 9. Site Deficiencies & Required Actions:

1) Manifest Exception reporting. 40 CFR 262.42, adopted by reference at 15A NCAC 13A .0107, states that:

A generator of greater than 1000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

(2) A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts

Special Metals is in violation of this regulation in that signed delivery copy was missing for manifest number 1590611 and/or 1591960 of 15 containers of D005 hazardous waste manifest.

Special Metals must obtain signed delivery copy for hazardous waste manifest number 1590611 and/or 1591960.

2) **Personnel training.** 40 CFR 265.16 (c), adopted by reference at 15A NCAC 13A .0110, states that:

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section . (c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

Page 5

Special Metals is in violation of this regulation in that not all facility personnel responsible for the management of hazardous waste are completing annual classroom training. Steve Winnell and Tom Dickerson are emergency coordinators in the facility's contingency plan, and do not have documented annual training. Hewitt Linyard manages hazardous waste and signs hazardous waste manifests and does not have documented annual hazardous waste training.

Special Metals must have all hazardous waste management personnel take part in an annual review of hazardous waste training.

3) Personnel Job Descriptions. 40 CFR 265.16 (d) (2), adopted by reference at 15A NCAC 13A .0110, states that:

The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

Special Metals is in violation of this regulation in that employee job descriptions for the employees handling hazardous waste are not documented. Job descriptions for hazardous waste management is not documented for Hewitt Linyard, Bobby Catoe, and Willie Logan.

Special Metals must have documented employee job descriptions for the employees handling hazardous waste.

4) Amendment to Contingency Plan. 40 CFR 265.54 (d), adopted by reference at 15A NCAC 13A .0110, states that:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The facility changes—in its design, construction, operation, maintenance, or other circumstances—in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(d) The list of emergency coordinators changes; or

(e) The list of emergency equipment changes.

Special Metals is in violation of this regulation in that the Contingency Plan has not been updated for changes in Emergency Coordinators.

Special Metals must update the Contingency Plan with correct Emergency Coordinators and submit to all local emergency authorities.

5) Maintenance and operation of facility. 40 CFR 265.31, adopted by reference at 15A NCAC 13A .0110, states that:

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Special Metals is in violation of this regulation in that Baghouse # 6, hazardous waste container, and spilled hazardous waste material were exposed to the outside elements. The concrete pad rainwater was not collected but was allowed to flow onto the soil.

Special Metals must prevent the release of hazardous waste into the environment.

6) Satellite Accumulation Area Management. 40 CFR 262.34 (c) (1), adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0102 states that :

A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040 Page 7

٦

operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained two 55 gal. containers identified by Bobby Catoe as D005 Barium dust. The hazardous waste at this area exceeded 55 gals. of total hazardous waste.

These containers of hazardous waste where not under the control of an operator.

Special Metals must not have more than 55 gals. of hazardous waste in a Satellite Accumulation Area.

Satellite Accumulation Areas must be under the direct control of an operator.

7) Management of Containers. 40 CFR 262.34(a)(1)(i) adopted by reference at 40 CFR 265.173 (a), adopted by reference at 15A NCAC 13A .0102 states that:

A container of hazardous waste must always be closed, except when it is necessary to add or remove waste.

Special Metals is in violation of this regulation in that Baghouse #5 collection area contained a 55 gal. container of hazardous waste that was not closed.

Special Metals must keep all containers of hazardous waste closed except when it is necessary to add or remove waste.

8) Aisle Spacing. 40 CFR 262.34(a)(1)(i) adopted by reference 15A NCAC 13A .0110 (c), states that:

A facility's owner or operator must maintain aisle space of at least two feet to allow the unobstructed movement of personnel, fire prevention equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

Special Metals is in violation of this regulation in that here was not adequate aisle spacing of containers of hazardous waste in the Waste Storage Area to allow unobstructed movement of personnel or safety equipment.

Special Metals must maintain adequate aisle spacing of waste containers in the Hazardous Waste Storage Area.

9) Waste into Containers. 40 CFR 262.34 (a) (1) (i), adopted by reference at 15A NCAC 13A .0107, states that:

Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with the applicable requirements of subparts I, AA, BB and CC of 40 CFR part 265.

Special Metals is in violation of this regulation in that spillage of material identified by Bobby Catoe as D005 hazardous waste was noted on the outside of one of the containers in the Hazardous Waste Storage Area.

Special Metals must place all hazardous waste into containers.

#### 10. Comments/Recommendations:

- Digital photos were taken during the inspection.
- The management of all RCRA required documents should be improved as discussed during the inspection.
- The facility should up date the RCRA facility information utilizing EPA form 8700-12 to indicate correct contact person.

#### 11. Photos:



PHOTO #1 Special Metals -Rear Pad Hazardous Waste Storage Area -No adequate aisle spacing



PHOTO #2 Special Metals -Rear Pad Hazardous Waste Storage Area -Hazardous waste, D005, not in containers



# PHOTO #3

Special Metals -Baghouse #6 Satellite Accumulation Area

-D005 Barium Hazardous Waste outside of container

-Failure to maintain facility to minimize the possibility of an unplanned release of hazardous waste to soil and surface water.



PHOTO #4



**PHOTO #5** 

Special Metals

-Baghouse #5 Satellite Accumulation Area

-Greater than 55 gals. of hazardous waste in a Satellite Accumulation Area.

-Area not under the direct control of an operator.

-Container not closed.



РНОТО #6

Stephen H. Barron Environmental Senior Specialist

Ň

Date

cc: Facility MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files



13may09 001.jpg



13may09 002.jpg



13may09 003.jpg



13may09 004.jpg



13may09 005.jpg



13may09 006.jpg







13may09 009.jpg



13may09 010.jpg



13may09 011.jpg



13may09 012.jpg



13may09 013.jpg

Jein Metal Bring Og James James James

11. Photos:



Special Metals -Rear Pad Hazardous Waste Storage Area -No adequate aisle spacing



Special Metals -Rear Pad Hazardous Waste Storage Area -Hazardous waste, D005, not in containers



Special Metals

-Baghouse #6 Satellite Accumulation Area

-D005 Barium Hazardous Waste outside of container

-Failure to maintain facility to minimize the possibility of an unplanned release of hazardous waste to soil and surface water.





Special Metals

-Baghouse #5 Satellite Accumulation Area

-Greater than 55 gals. of hazardous waste in a Satellite Accumulation Area.

-Area not under the direct control of an operator.

-Container not closed.



rolf#1

Inspection Notes

pein met Date: 13mm 09 Site Name: County: Address: Contact / Phone #: tentio Violation Notes: 1 - Hazardous Waste Engloyces not annud - Hewitt Lingard - Sign namfor - Steve Winnell - Ener. C Winn Jon Dicker Coord. 2-Not Job Descriptions for Hazard waste - Willie Logan - R.L. Cator - Dien loyces R.L. Cator -Hewitt Linyand - Sign mangest 3 - Contugency Plan not yoda (Alan Jones ~ 4- manifest not with Signed Copy - Failure to do Exception Report 1590611 - 1591960? &- Waste Storage Area Space, out side dreen Satellite Accum. BAG house # 6 7 - Waste Spillage ouse # 5 8- open Containon Not Gal REDI ommento Management of PU RCRA paper look 2-Update LOPA form 8700-12 Alen Jones 3- Recommend Dwa Og zmr



Alan Jones Manager – Engineering, Safety, Health, and Environment 1401 Burris Road Newton, NC 28658 USA Phone 828-465-0352 ext. 211 Fax 828-465-3447 www.specialmetalswelding.com e-mail: ajones@smwpc.com

May 23, 2008

Mr. Dale Coffey City of Newton Fire Marshall 116 "A" Street Newton, NC 28658

Mr. David Weldon Catawba County Emergency Services P.O. Box 389 Newton, NC 28658

Mr. Donald Brown City of Newton Police Department P.O. Box 550 Newton, NC 28658

Mr. James Rumley City of Newton Wastewater Treatment Plant P.O. Box 550 Newton, NC 28658

Mr. Dale Greer Catawba Memorial Hospital 810 Fairgrove Church Road Hickory, NC 28602

Mr. Gary Sparts STAT, Inc. P.O. Box 1443 Lenoir, NC 28645

Mr. Stephen Barron North Carolina Department of Environment and Natural Resources – Hazardous Waste Section, Division of Waste Management 610 East Center Avenue Mooresville, NC 28115

INCONEL, INCOLOY, INCOFLUX, INCO-CORED, INCO-WELD, MONEL, NDUR-ALL, NI-ROD, NIMONIC, DURANICKEL, 686CPT, and 725NDUR are trademarks of the Special Metals group of companies.

#### Contingency Plan for Special Metals Welding Products, Newton, NC

RE: State and Local Agencies with Designated Response Roles

Attached please find a copy of the Integrated Contingency Plan for the Special Metals Welding Products Company at 1401 Burris Road, Newton, NC. Your organization is named in the document as a state or local agency with a designated response role. In accordance with 40CFR 265.37 (see next page) this plan must be communicated to you and reviewed by you to familiarize yourself with our facility and the nature of the potential chemical-related emergencies that could occur here.

Please review the attached Integrated Contingency Plan, and respond in writing to acknowledge your receipt and review of it, and/or to communicate back to me the need for any changes or corrections.

In accordance with 40CFR265.37 (b), if you or your agency is unable or unwilling to be part of our Contingency Plan, you must notify me in writing.

Sincerely,

Jones

Alan E. Jones – Manager Engineering, Safety, Health and Environment Special Metals Welding Products Company

Cc: Steve Winnell Tom Dickerson Jeannie Martin Gary Beaird Willie Logan

INCONEL, INCOLOY, INCOFLUX, INCO-CORED, INCO-WELD, MONEL, NDUR-ALL, NI-ROD, NIMONIC, DURANICKEL, 686CPT, and 725NDUR are trademarks of the Special Metals group of companies.

### 40CFR265.37

#### § 265.37 Arrangements with local authorities.

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

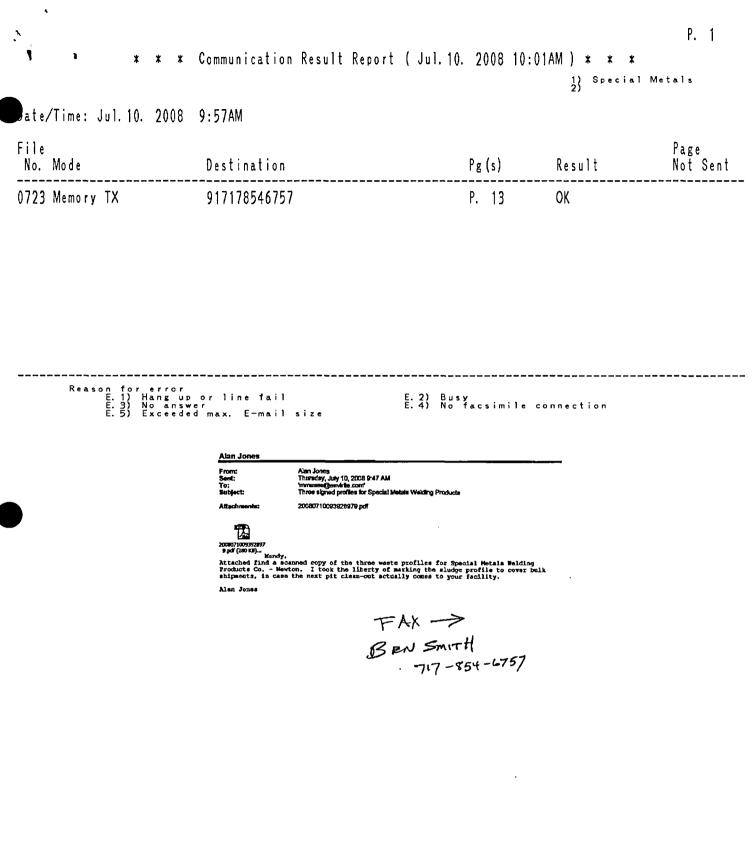
(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.



# Nan Jones

From: Sent: To: Subject: Alan Jones Thursday, July 10, 2008 9:47 AM 'mmusse@envirite.com' Three signed profiles for Special Metals Welding Products

**Attachments:** 

20080710093928979.pdf



2008071009392897 9.pdf (280 KB)...

Mandy,

Attached find a scanned copy of the three waste profiles for Special Metals Welding Products Co. - Newton. I took the liberty of marking the sludge profile to cover bulk shipments, in case the next pit clean-out actually comes to your facility.

Alan Jones

FAX -> BEN Smith 717-854-6757

Profile: 16342

A. Profile Information		
<b>Profile:</b> 16342	File Ref #: 14853	
Common Description: BARIUM SLUD	3E	
B. Company Information		
Generator Address	Bill-To Address	Disposal Facility Address
Special Metals Welding Products 1401 Burris Road	Special Metals Welding Products 1401 Burris Road	Envirite of Pennsylvania, Inc. 730 Vogelsong Road
Newton, NC 28658	Newton, NC 28658	York, PA 17404
NCD980841951 Contact: Alan Jones 828-465-0352 EXT211	CD980841951 Contact:	PAD010154045
828-465-0352	828-465-0352	
SIC: NAICS:		
C. DOT Information		
DOT Name: RQ, Hazardous waste	, liquid, n.o.s., 9 , NA3082, PG III (D005)	
/		
Container Type DM $/TT$	Container Size: 55 / 5000	
D. Blennial/Annual Reporting Ir	formation	
Source Code G15 For	n Code W319	
E Dhysical Dreparties		
E. Physical Properties		P/ 011/Crosses
E. Physical Properties Color: Grey	Odor:None	% Oil/Grease:0
Color: Grey FLASH POINT	FREE LIQUIDS	PHASES
Color: Grey FLASH POINT < 100 F	FREE LIQUIDS	PHASES X SINGLE
Color: Grey FLASH POINT Color: Grey FLASH POINT Color: Grey 100 - 139 F	FREE LIQUIDS	PHASES
Color: Grey FLASH POINT < 100 F	FREE LIQUIDS	PHASES X SINGLE
Color: Grey FLASH POINT < 100 F	FREE LIQUIDS	PHASES
Color: Grey  FLASH POINT  < 100 F 100 - 139 F > 140 F × >200 F PHYSICAL STATE	FREE LIQUIDS	PHASES
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS	PHASES
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS         X       YES         NO       PH         2       >2 - <4.9	PHASES
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS	PHASES
Color: Grey  FLASH POINT  < 100 F 100 - 139 F > 140 F > 200 F PHYSICAL STATE SOLID POWDER X SLUDGE	FREE LIQUIDS         X       YES         NO       PH         2       PH         >2 - <4.9       X       >5 - <9.9	PHASES
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS         X       YES         NO       pH        <<2	PHASES       X     SINGLE       DOUBLE
Color: Grey	FREE LIQUIDS         X       YES         NO       pH        <<2	PHASES       X     SINGLE       DOUBLE
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS         X       YES         NO       pH          <2	PHASES       X     SINGLE       DOUBLE
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS         X       YES         NO       pH         <2	PHASES
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS         X       YES         NO       pH         <2	PHASES         X       SINGLE         DOUBLE       MULTI         MULTI       MULTI         Actual Value       Reg. Level       UM         100       100.0       MG/L         5       5.0       MG/L
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS         X       YES         NO       pH         <2	PHASES           X         SINGLE           DOUBLE         MULTI           MULTI         MULTI
Color: Grey         FLASH POINT         < 100 F	FREE LIQUIDS         X       YES         NO       pH         <2	PHASES           X         SINGLE           DOUBLE         MULTI           MULTI         Image: Simple state sta

•

.

03 JUL 2008

•

#### Profile: 16342

Page 2 of 4

CHLOROFORMTCLP	6	<	6.0	MG/L	O-CRESOL TCLP	200	<	200	MG/
M-CRESOL TCLP	200	<	200	MG/L	P-CRESOL TCLP	200	<	200	MG/
CRESOL TCLP	200	<	200	MG/L	2,4-D TCLP	10	<	10	MG/
ENDRIN TCLP	.02	<	0.02	MG/L	HEPTACHLOR (AND ITS EPOXIDE	.008	<	0.008	MG/
HEXACHLOROBENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLOROBENZENE TCLP	7.5	<	7.5	MG/
HEXACHLORO-1,3 BUTADIENE T	.5	<	.5	MG/L	HEXACHLOROETHANE TCLP	3	<	3	MG/
NITROBENZENE TCLP	2	<	2	MG/L	LINDANE TCLP	.4	<	0.4	MG/
METHOXYCHLOR TCLP	10	<	10	MG/L	METHYL ETHYL KETONE TCLP	200	<	200	MG/
PENTACHLOROPHENOL TCLP	100	<	100	MG/L	PYRIDINE TCLP	5	<	5	MG/
TETRACHLOROETHYLENE TCLP	7	<	0.7	MG/L	TOXAPHENE TCLP	.5	<	0.5	MG/
1,2-DICHLOROETHANE TCLP	.5	<	0.5	MG/L	1,1-DICHLOROETHYLENE TCLP	.7	<	.7	MG/
2,4-DINITROTOLUENE TCLP	.13	<	.13	MG/L	2,4,5 TRICHLOROPHENOL TCLP	400	<	400.0	MG/
2,4,6 TRICHLOROPHENOL TCLP	2	<	2.0	MG/L	2,4,5-TP (SILVEX) TCLP	.2	<	0.2	MG/
MNYL CHLORIDE TCLP	.2	<	0.2	MG/L					
G. Underlying Haz. Cons	tituent	S							
NONE				Va	ue <u>UM</u> %				
H. Chemical Composition Chemical	n		<u> </u>						
Other			L	ow	High UM				
Water					= 10 %				
Barium Sludge					= 90 %				
	waste p	oer 40 (	CFR 261	or equiv	-	? Yes			
I. Waste Codes									
D005 Barium									
J. Generation Information	า								
Generating CLEAN-UP FRO Process:	MWASHII	NG EQUIF	MENTAFT	rer mixing	FLUX - ACCUMULATION INTO PIT.				
Generation Rate 20 TON per YF	R								

)3 JUL 2008	Waste N	Envirite Iaterial Profile Sheet Profile: 16342	Page 3 of 4
K. Waste C	haracteristics		
	Insecticides 🗌		Carcinogen
	Shock Sensitive	Dioxin	PCB's:
	Pesticides 🦳	Pyrophoric 🗌	RX Cyanide >250ppm 📃
	Herbicides 🗌	Household Waste:	RX Sulfide >500ppm 🗌
	Radioactive:	Crystalline Free Silica 📃	(Unless Checked) None Apply
	Medical Waste 📃	Explosive	Other (specify)
	Oxidizers 🗌	Asbestos: 🗌	
Additional I	nformatior		

Profile: 16342

IS THIS A WASTEWATER PER 40CF	R 268	BYPRODUCT
IS THIS A NON-WASTEWATER PER	40 CFR 268	RX WITH LIME TO CREATE FLAM. GAS
UNIVERSAL WASTE		Y DOES NOT RX VIOLENTLY WITH LIME
CHARACTERISTIC SLUDGE		CONTAINS VOCS OVER 500PPM
VIRGIN UNUSED PRODUCT		Y     DOES NOT CONTAIN VOCS OVER 500PPM
SPENT MATERIAL		
WASTE HAS BEEN TREATED		POLLUTION CONTROL WASTE (IL)
CYANIDE PLATING ON SITE		INDUSTRIAL PROCESS WASTE (IL)
SUBSTITUTE COMMERCIAL PRODU	JCT	
ark ALL conditions that apply, a blank response co	onfirms the above condition(s) do	not apply to this waste stream.)
	ections to this waste	profile. I understand that I will be required to confirm
any changes in writing. hereby avow that any pertinent been disclosed. I certify that, to	Yes No information that is kr the best of my knowle	
any changes in writing. hereby avow that any pertinent been disclosed. I certify that, to accurate representations of this	Yes No. information that is kr the best of my knowle waste material.	o nown by the generator conerning possible hazards edge, all statements and attachments are correct an
any changes in writing. hereby avow that any pertinent been disclosed. I certify that, to accurate representations of this Signee Name	Yes No information that is kr the best of my knowle waste material. Signee Date	o nown by the generator conerning possible hazards edge, all statements and attachments are correct an Signee Title
ny changes in writing. hereby avow that any pertinent been disclosed. I certify that, to accurate representations of this Signee Name	Yes No information that is kr the best of my knowle waste material. Signee Date	o nown by the generator conerning possible hazards edge, all statements and attachments are correct an
any changes in writing. hereby avow that any pertinent been disclosed. I certify that, to accurate representations of this	Yes No information that is kr the best of my knowle waste material. Signee Date	nown by the generator conerning possible hazards edge, all statements and attachments are correct an Signee Title Mart Ergineer Company Special Metals Webling F Time of Sampling:
hereby avow that any pertinent been disclosed. I certify that, to be ccurate representations of this Signee Name <u>ALAN JONES</u> Signature <u>Man Jon</u> Date of Sampling:	Yes ☐ No Information that is knowled waste material. Signee Date 7 -10 - 08	nown by the generator conerning possible hazards edge, all statements and attachments are correct an Signee Title Plant Ergineen Company Special Metals Webbing F
any changes in writing. hereby avow that any pertinent been disclosed. I certify that, to accurate representations of this Signee Name <u>ALAN JONES</u> Signature <u>Man Jon</u>	▼Yes       No         information that is kr         the best of my knowle         waste material.         Signee Date         7 -10 - 08	nown by the generator conerning possible hazards edge, all statements and attachments are correct and Signee Title Mart Engineer Company Special Metals Webding / Time of Sampling: AM/PM

7

03 JUL 2008

۲

Page 4 of 4

¥ • 03 JUL 2008

•

.

#### Envirite Waste Material Profile Sheet .... ---

Page 1 of 4

A. Profile Information				· · · · · · ·						
Profile: 16	343			File Ref #: 10827						
Common Description:EX	TRUSION SOL	.IDS								
B. Company Informati	on								<u> </u>	
Generator Addre	SS			Address					y Address	I
Special Metals Welding Product	s			ng Products	11	ite of Pe			с.	
1401 Burris Road		1401 Burris	Road		730 \	/ogelsoi	ng Roa	ď		
Newton, NC 28658		Newton, N	28658		York	PA 174	04			
NCD980841951		NCD98084				0101540				
Contact: Alan Jones 828-465-0	352 EXT211	Contact: A	lan Jones	828-465-0352 EXT211						
828-465-0352		828-465-03	352							
SIC: NAICS:	· · · · · · · · · · · · · · · · · · ·									
C. DOT Information										
DOT Name: RQ, Haza	rdous waste, s	solid, n.o.s., 9 , I	NA3077, F	PG III (D005)						
Container Type DM	Co	ontainer Size	: 55							
D. Biennial/Annual Rej	norting Infr	ormation								
	porting init	Jimadon								
	E	<b>O</b>								
Source Code G21	Form	Code W319								
		Code W319								
Source Code G21		·····	dor:N/A				% Oil	/Grea	se:0	
Source Code G21 E. Physical Properties	5	00	dor:N/A FREE L	IQUIDS			-	/Grea	_	
Source Code G21 E. Physical Properties Color: Black	5	00		IQUIDS	X :	SINGLE	PH/		_	
Source Code G21 E. Physical Properties Color: Black FLASH POINT	5	00		IQUIDS		SINGLE	PH/		_	
Source Code G21 E. Physical Properties Color: Black FLASH POINT C < 100 F	5			IQUIDS	<u> </u>		PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	5			IQUIDS	<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>				<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>		FREE L		<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>	00	FREE L		<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>	00 YES X NO 	FREE L pl		<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>	00	FREE L pl		<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>	0 YES X NO C C C C C C C C C C C C C	FREE L pl		<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>	0 YES X NO C C C C C C C C C C C C C	FREE L pl		<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>	0 YES X NO C C C C C C C C C C C C C	FREE L pl		<u> </u>	DOUBL	PH/		_	
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	<u>.</u>	0 YES X NO 2 2 2 2 2 2 2 2 2 2 2 2 2	FREE L pl 4.9 9.9 <12.4		<u> </u>	DOUBL	PH/	ASES	_	
Source Code G21 E. Physical Properties Color: Black FLASH POINT <pre>     </pre> \$ 100 F           100 - 139 F           > 140 F           \$ >200 F           PHYSICAL STA           X           SOLID           POWDER           SLUDGE           LIQUID           LIQUID/SOLID           F. TCLP           TCLP	TE	0 YES X NO 2 2 2 2 2 2 2 2 2 2 2 2 2	FREE L pl 4.9 9.9 <12.4	H BARIUM TCLP	<u> </u>	OOUBL MULTI Act	PH/ E	ASES		
Source Code G21 E. Physical Properties Color: Black FLASH POINT <pre>     </pre> < 100 F	TE Actual Valu 5 1	O YES X NO C C C C C C C C C C C C C	FREE L pl 4.9 9.9 <12.4 el UM MG/L MG/L	H BARIUMTCLP CHROMUMTCLP	<u> </u>	OOUBL MULTI Act	PH/ E ual Val 100 5	ue <	Reg. Leve 100.0 5.0	M
Source Code G21 E. Physical Properties Color: Black FLASH POINT <pre>     </pre> < 100 F	TE Actual Valu 5 1 5	O YES X NO C C C C C C C C C C C C C	FREE L pl 4.9 9.9 <12.4 el UM MG/L MG/L	H BARIUMTCLP CHROMUMTCLP MERCURYTCLP	<u> </u>	OOUBL MULTI Act	PH/ E ual Val 100 5 .2	ue <	Reg. Leve 100.0 5.0 0.2	M M M
Source Code         G21           E. Physical Properties           Color: Black           FLASH POINT           < 100 F	TE Actual Valu 5 1	O YES X NO C C C C C C C C C C C C C	FREE L pl 4.9 9.9 <12.4 el UM MG/L MG/L	H BARIUMTCLP CHROMUMTCLP		Act	PH/ E ual Val 100 5	ue <	Reg. Leve 100.0 5.0	

Profile: 16343

					1.4.7500.100 cm				
CHLOROFORMTCLP	6	<	6.0	MG/L	O-CRESOL TCLP	200	<	200	MG/L
M-CRESOL TCLP	200	<	200	MG/L	P-CRESOL TCLP	200	<	200	MG/L
CRESOL TCLP	200	<	200	MG/L	2,4-D TCLP	10	<	10	MG/L
ENDRIN TCLP	.02	<	0.02	MG/L	HEPTACHLOR (AND ITS EPOXIDE	.008	<	0.008	MG/L
HEXACHLOROBENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLOROBENZENE TCLP	7.5	<	7.5	MG/L
HEXACHLORO-1,3 BUTADIENE T	.5	<_	.5	MG/L	HEXACHLOROETHANE TCLP	3	<	3	MG/L
NITROBENZENE TCLP	2	<	2	MG/L	LINDANE TCLP	.4	<	0.4	MG/L
METHOXYCHLOR TCLP	10	<	10	MG/L	METHYL ETHYL KETONE TCLP	200	<	200	MG/L
PENTACHLOROPHENOL TCLP	100	<	100	MG/L	PYRIDINE TCLP	5	<	5	MG/L
TETRACHLOROETHYLENE TCLP	7	<	0.7	MG/L	TOXAPHENE TCLP	.5	<	0.5	MG/L
1,2-DICHLOROETHANE TCLP	.5	<	0.5	MG/L	1,1-DICHLOROETHYLENE TCLP	.7	<	.7	MG/L
2,4-DINITROTOLUENE TCLP	.13	<	.13	MG/L	2,4,5 TRICHLOROPHENOL TCLP	400	<	400.0	MG/L
2,4,6 TRICHLOROPHENOL TCLP	2	<	2.0	MG/L	2,4,5-TP (SILVEX) TCLP	.2	<	0.2	MG/L
MNYL CHLORIDE TCLP	.2	<	0.2	MG/L					
					%		-		
H. Chemical Compositio Chemical	<u>n</u>			<u> </u>				, <u></u>	- <u></u>
Other			L	ow	High UM				
Extrusion Solids				· · · ·	= 100 %		_	<u> </u>	
Barium					> 100 PPM				
Is this a RCRA Hazardous Is this a Listed Hazardous Is this a Characteristic Haz	waste p	oer 40	CFR 261	or equi	-	Yes			
I. Waste Codes									
D005 Barium					]		-		
J. Generation Informatio	n								· · · · ·
					NING OF WELDING RODS. THE METAL ROD FROM THESE RODS WILL BE PART OF T				4

Generation Rate 10 DMper QTR

Page 2 of 4

03 JUL 2008

.

.

•

03 JUL 2008	Waste N	Envirite Iaterial Profile Sheet Profile: 16343	Page 3 of 4
K. Waste C	haracteristics		· · · · · · · · · · · · · · · · · · ·
	Insecticides		Carcinogen
	Shock Sensitive	Dioxin	PCB's:
	Pesticides 🗌	Pyrophoric 📃	RX Cyanide >250ppm 📃
	Herbicides 🦳	Household Waste: 🗌	RX Sulfide >500ppm
	Radioactive:	Crystalline Free Silica 📃	(Unless Checked) None Apply Y
	Medical Waste 📃	Explosive	Other (specify) 📋
	Oxidizers 🗌	Asbestos:	
Additional	Informatior		
1			

Page 4 of 4

L. Regulatory Characterization		
IS THIS A WASTEWATER PER 40CFR 26	68 BYPR	ODUCT
IS THIS A NON-WASTEWATER PER 40 C		TH LIME TO CREATE FLAM. GAS
UNIVERSAL WASTE		NOT RX VIOLENTLY WITH LIME
CHARACTERISTIC SLUDGE		AINS VOCS OVER 500PPM
VIRGIN UNUSED PRODUCT		NOT CONTAIN VOCS OVER 500PPM
SPENT MATERIAL		AINS METALLIC FINES/POWDERS
WASTE HAS BEEN TREATED		JTION CONTROL WASTE (IL)
CYANIDE PLATING ON SITE		STRIAL PROCESS WASTE (IL)
SUBSTITUTE COMMERCIAL PRODUCT		
lark ALL conditions that apply, a blank response confirms	s the above condition(s) do not apply to this	waste stream.)
	ons to this waste profile. I u X Yes	nderstand that I will be required to confir
any changes in writing.	Yes INO Prmation that is known by th best of my knowledge, all st	nderstand that I will be required to confir e generator conerning possible hazards atements and attachments are correct ar
any changes in writing. I hereby avow that any pertinent info been disclosed. I certify that, to the	Yes INO Prmation that is known by th best of my knowledge, all st	e generator conerning possible hazards
any changes in writing. I hereby avow that any pertinent info been disclosed. I certify that, to the accurate representations of this was Signee Name	Yes INO ormation that is known by th best of my knowledge, all st ste material. Signee Date	e generator conerning possible hazards atements and attachments are correct ar Signee Title
any changes in writing. I hereby avow that any pertinent info been disclosed. I certify that, to the accurate representations of this was	Yes No ormation that is known by th best of my knowledge, all st ste material. Signee Date	e generator conerning possible hazards atements and attachments are correct ar
any changes in writing. I hereby avow that any pertinent info been disclosed. I certify that, to the accurate representations of this was Signee Name	Yes No ormation that is known by th best of my knowledge, all st ste material. Signee Date	e generator conerning possible hazards atements and attachments are correct an Signee Title <u>PLANT ENGINEER</u> Special Metab Welding Production Time of Sampling:
any changes in writing.	Yes Downward No No No No No No No No No No	e generator conerning possible hazards atements and attachments are correct an Signee Title <u>PLANT ENGINEER</u> Special Metab Welding Product
any changes in writing.	Yes No prmation that is known by th best of my knowledge, all st ste material. Signee Date 7-10-08 Company of Company of the state of the sta	e generator conerning possible hazards atements and attachments are correct an Signee Title <u>PLANT ENGINEER</u> Special Metab Welding Production Time of Sampling:



•

03 JUL 2008

•

Profile: 16344

Page 1 of 4

A. Profile Information							
Profile: 16	344		File Ref #: 1	0828			
Common Description: BAG HOUSE DUST							
B. Company Informati	on						
Generator Addre			Bill-To Address	Disposal			
Special Metals Welding Product	5	11	tals Welding Products	Envirite of Pennsylv		с.	
1401 Burris Road		1401 Burris	s Road	730 Vogelsong Roa	ad		
Newton, NC 28658		Newton, N	C 28658	York, PA 17404			
NCD980841951		NCD98084		PAD010154045			
Contact: Alan Jones 828-465-0	352 EXT211	Contact:					
828-465-0352		828-465-0	352				
SIC: NAICS:							
C. DOT Information						_	
DOT Name: RQ, Haza	rdous waste, s	solid, n.o.s., 9 , I	NA3077, PG III (D005)				
Container Type DM	Ce	ontainer Size	: 55				
D. Biennial/Annual Re	porting Info	ormation			·		
Source Code G21	Form	Code W319				-	
E. Physical Properties	;						
Color: Black	<u> </u>	0	dor:N/A	% O	il/Grea	se:0	
Color: Black		0	dor:N/A FREE LIQUIDS		il/Grea		
		O VES					
FLASH POINT				PH			
FLASH POINT		YES		PH X SINGLE			
FLASH POINT           < 100 F		YES					
FLASH POINT         < 100 F		YES					
FLASH POINT         < 100 F		YES	FREE LIQUIDS				
FLASH POINT         < 100 F		YES X NO	FREE LIQUIDS				
FLASH POINT         < 100 F		☐ YES	FREE LIQUIDS				
FLASH POINT         < 100 F		☐ YES X NO Control = 100 - 100	FREE LIQUIDS pH 4.9 9.9				
FLASH POINT         < 100 F		☐ YES X NO 3 < 2 3 < 2 3 < 2 4 < 2 3 < 2 < 4 X >5 - 4	FREE LIQUIDS pH 4.9 9.9 <12.4				
FLASH POINT         < 100 F		YES X NO X NO 2 - < 2 - < X >5 - < >10	FREE LIQUIDS pH 4.9 9.9 <12.4				
FLASH POINT         < 100 F		YES X NO X NO 2 - < 2 - < X >5 - < >10	FREE LIQUIDS pH 4.9 9.9 <12.4				
FLASH POINT         < 100 F		YES X NO X >2 - < >2 - < >2 - < >10 - √ >12.5	PH 9.9 <12.4				UN
FLASH POINT         < 100 F	TE	YES X NO 3 < 2 3 < 2 3 < 2 3 < 2 3 < 2 4 < >2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 2 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 3 < 10 < 4 4 < 10 < 4 4 < 5.0	PH           4.9           9.9           <12.4	PH X SINGLE DOUBLE MULTI MULTI Actual V P 100		Reg. Level	MG/
FLASH POINT         < 100 F	TE Actual Valu 5 1	YES X NO X NO 2 - <4 >2 - <4 >2 - <4 >10 -  >10 -  >12.5 Ne Reg. Level < 5.0 < 1.0	PH 4.9 9.9 <12.4 rel UM MG/L BARIUM TCL MG/L CHROMIUM	PH	ASES	Reg. Level 100.0 5.0	MG/ MG/
FLASH POINT         < 100 F	Actual Valu 5 1 5	YES X NO X NO 32 - <4 32 - <4 >2 - <4 >2 - <4 >10 -  >10 -  >12.5 ae Reg. Lev < 5.0 < 1.0 < 5.0	PH 4.9 9.9 <12.4 rel UM MG/L BARIUM TCL MG/L CHROMIUM MG/L MERCURY T	PH	alue	Reg. Level 100.0 5.0 0.2	MG/ MG/ MG/
FLASH POINT         < 100 F	TE Actual Valu 5 1	YES X NO X NO 2 - <4 >2 - <4 >2 - <4 >10 -  >10 -  >12.5 Ne Reg. Level < 5.0 < 1.0	PH 4.9 9.9 <12.4 rel UM MG/L BARIUM TCL MG/L CHROMIUM MG/L MERCURY T MG/L SILVER TCL	PH	ASES	Reg. Level 100.0 5.0	UM MG/ MG/ MG/

	Profile: 16344	

•

03 JUL 2008

.

ſ

							. <u></u>			
CHLOROFORMTCLP	6	<	6.0	MG/L	O-CRESOL 1	ICLP	200	<	200	MG/L
M-CRESOL TCLP	200	<	200	 MG/L	P-CRESOL T	CLP	200	<	200	MG/L
CRESOL TCLP	200	<	200	MG/L	2,4-D TCLP		10	<	10	MG/L
ENDRIN TCLP	.02	<	0.02	MG/L		OR (AND ITS EPOXIE	DE .008	<	0.008	MG/L
HEXACHLOROBENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLO	ROBENZENE TCLP	7.5	<	7.5	MG/L
HEXACHLORO-1,3 BUTADIENE T	.5	<	.5	MG/L	HEXACHLOF	ROETHANE TCLP	3	<	3	MG/L
NITROBENZENE TCLP	2	<	2	MG/L	LINDANE TO	LP	.4	<	0.4	MG/L
METHOXYCHLOR TCLP	10	<	10	MG/L	METHYL ETH	IYL KETONE TCLP	200	<	200	MG/L
PENTACHLOROPHENOL TCLP	100	<	100	MG/L	PYRIDINE TO		5	<	5	MG/L
TETRACHLOROETHYLENE TCLP		<	0.7	MG/L	TOXAPHENE			<	0.5	MG/L
1,2-DICHLOROETHANE TCLP	.5	<	0.5	MG/L	1,1-DICHLO	ROETHYLENE TOLE	<u>.7</u>	<	.7	MG/L
2,4-DINITROTOLUENE TCLP	.13	<	.13	MG/L_		LOROPHENOL TCL		<	400.0	MG/L
2,4,6 TRICHLOROPHENOL TCLP	2	<	2.0	MG/L	2,4,5-TP (SIL	VEX) TCLP	.2	<	0.2	MG/L
MNYL CHLORIDE TCLP	.2	<	0.2	MG/L						
G. Underlying Haz. Cons	tituent	:S								
				Va	lue	<u>UM</u>				
NONE						%				
H. Chemical Compositio Chemical	n									
Other		·	L	ow	High	UM				· · · ·
Barium					> 100	PPM	· · · · · ·			
Bag House Dust					= 100	%				
Is this a RCRA Hazardous Is this a Listed Hazardous Is this a Characteristic Haz	waste	per 40	CFR 261	or equi	valent State I	Regulation? No	)			
I. Waste Codes							- <u>-</u>			
D005 Barium										
J. Generation Informatio	n		<u> </u>							
Generating MINERALS, ME Process:	TALLICS,	SILICAB	INDER CLE	AN UP ARC	DUND MIX PIT TH	AT MAKES FLUX FOR V	VELDING ROD	os.		
Generation Rate 10 DMper QT	R	·								

• , 03 101	L 2008 Waste	Envirite Material Profile Sheet Profile: 16344	Page 3 of 4
	K. Waste Characteristics		
	Insecticides 🔄		Carcinogen
	Shock Sensitive	Dioxin 🗌	PCB's:
	Pesticides 🦲	Pyrophoric 📋	RX Cyanide >250ppm [
	Herbicides	Household Waste:	RX Sulfide >500ppm [
	Radioactive:	Crystalline Free Silica 🗌	(Unless Checked) None Apply Y
	Medical Waste 📃	Explosive	Other (specify)
	Oxidizers 🔤	Asbestos:	
	Additional Informatior		

UL 2008	Profile: 163	44	Page 4 of 4
L. Regulatory Characterizati	on		
IS THIS A WASTEWATER PER 4	0CFR 268	BYPRODUCT	
Y IS THIS A NON-WASTEWATER F	PER 40 CFR 268	RX WITH LIME TO CREATE FLAM. GAS	
		Y DOES NOT RX VIOLENTLY WITH LIME	
		CONTAINS VOCS OVER 500PPM	
VIRGIN UNUSED PRODUCT		Y DOES NOT CONTAIN VOCS OVER 500PPM	
Y SPENT MATERIAL		CONTAINS METALLIC FINES/POWDERS	
WASTE HAS BEEN TREATED		POLLUTION CONTROL WASTE (IL)	
CYANIDE PLATING ON SITE		INDUSTRIAL PROCESS WASTE (IL)	
SUBSTITUTE COMMERCIAL PR			
Profile is a broker or other age notification (on generator letter	person authorized to repre nt not employed by the gen head) documenting the au	sent the generator. If the individual signing perator of the waste, the generator must pro	vide written
This form must be signed by a Profile is a broker or other age notification (on generator letter I authorize Envirite to make c any changes in writing. I hereby avow that any pertine	person authorized to reprent not employed by the gen thead) documenting the au orrections to this waste p Yes No ent information that is knowle	sent the generator. If the individual signing perator of the waste, the generator must pro phority granted that individual.	vide written I to confirm e hazards h
This form must be signed by a Profile is a broker or other age notification (on generator letter I authorize Envirite to make c any changes in writing. I hereby avow that any pertin- been disclosed. I certify that,	person authorized to reprent not employed by the gen thead) documenting the au orrections to this waste p Yes No ent information that is knowle	sent the generator. If the individual signing perator of the waste, the generator must pro thority granted that individual. rofile. I understand that I will be required	vide written I to confirm e hazards h
This form must be signed by a Profile is a broker or other age notification (on generator letterI authorize Envirite to make c any changes in writing.I hereby avow that any perting been disclosed. I certify that, accurate representations of t Signee NameALAN JONES	person authorized to repre- nt not employed by the gen- thead) documenting the au- orrections to this waste p $X$ Yes $\square$ No ent information that is knowle to the best of my knowle his waste material. Signee Date 7 - 10 - 0	sent the generator. If the individual signing perator of the waste, the generator must pro- thority granted that individual. rofile. I understand that I will be required own by the generator conerning possible dge, all statements and attachments are of Signee Title <i>MAMT ENGM</i>	to confirm hazards h correct and
This form must be signed by a Profile is a broker or other age notification (on generator letterI authorize Envirite to make c any changes in writing.I hereby avow that any perting been disclosed. I certify that, accurate representations of t Signee NameALAN JONES	person authorized to repre- nt not employed by the gen- thead) documenting the au- orrections to this waste p $X$ Yes $\square$ No ent information that is knowle to the best of my knowle his waste material. Signee Date 7 - 10 - 0	sent the generator. If the individual signing perator of the waste, the generator must pro- thority granted that individual. rofile. I understand that I will be required own by the generator conerning possible dge, all statements and attachments are o Signee Title	to confirm hazards h correct and
This form must be signed by a Profile is a broker or other age notification (on generator letterI authorize Envirite to make c any changes in writing.I hereby avow that any perting been disclosed. I certify that, accurate representations of t Signee NameALAN JONES	person authorized to repre- nt not employed by the gen- thead) documenting the au- orrections to this waste p Yes No- ent information that is knowle to the best of my knowle his waste material. Signee Date 7-10-00	sent the generator. If the individual signing perator of the waste, the generator must pro- thority granted that individual. rofile. I understand that I will be required own by the generator conerning possible dge, all statements and attachments are of Signee Title <i>MAMT ENGM</i>	to confirm to confirm hazards h correct and <i>EEK</i>

Title and Affiliation of Sampler:

Profile: 16344

Page 1 of 4

Profile: 163	24.4		File Ref #:	10828				
		_	Flie Ker#:	10020				
Common Description:BAC	GHOUSE DUS	ST						
B. Company Information	on							
Generator Addres	ss		Bill-To Address	Di	isposal F	acility	Address	
Special Metals Welding Products	6	Special Meta	als Welding Products	Envirite of	Pennsylva	nia, Ind	<b>D</b> .	
1401 Burris Road		1401 Burris	Road	730 Vogel	Isong Road	ł		
				11				
Newton, NC 28658		Newton, NC	28658	Vork, PA 1	7404			
NCD980841951		NCD980841	1951	PAD0101	54045			
Contact: Alan Jones 828-465-0	352 EXT211	Contact:						
828-465-0352		828-465-03	52					
SIC: NAICS:		_] [		![				
C. DOT Information								
DOT Name: RQ, Haza	rdous waste, s	olid, n.o.s., 9 , N	A3077, PG III (D005)		·			
			· ·					
<u>.</u>								
Container Type DM	Co	ontainer Size:	55					
D. Biennial/Annual Rep	porting Info	ormation						
					··· <u>··</u> ·····			
Source Code G21	Form	Code W319	·		<u> </u>			<u> </u>
E. Physical Properties			······································					
Color: Black			or:N/A		% Oil/	Groot		
COIOF: Black		Uu	OFIN/A		70 UII/	Giea	50.0	
والشريبي والكمي والمهيين والب								
FLASH POINT	•		FREE LIQUIDS		PHA	ASES		
FLASH POINT	•	YES	FREE LIQUIDS		PHA	ASES		
			FREE LIQUIDS		PH/ GLE	ASES		
< 100 F		YES	FREE LIQUIDS		PH/ GLE IBLE	ASES		
<ul> <li>☐ &lt; 100 F</li> <li>☐ 100 - 139 F</li> <li>☐ &gt; 140 F</li> </ul>	· · · · · · · · · · · · · · · · · · ·	YES	FREE LIQUIDS		PH/ GLE IBLE	ASES		
<ul> <li>&lt; 100 F</li> <li>☐ 100 - 139 F</li> <li>&gt; 140 F</li> <li>X &gt; 200 F</li> </ul>		YES			PH/ GLE IBLE	ASES		
<pre>               &lt; 100 F                 100 - 139 F                &gt; 140 F                X &gt; 200 F                PHYSICAL STA</pre>		YES X NO	FREE LIQUIDS		PH/ GLE IBLE	ASES		
<ul> <li>&lt; 100 F</li> <li>100 - 139 F</li> <li>&gt; 140 F</li> <li>X &gt; 200 F</li> <li>PHYSICAL STA</li> <li>SOLID</li> </ul>		☐ YES X NO C <2	рН		PH/ GLE IBLE	ASES		
<ul> <li>&lt; 100 F</li> <li>100 - 139 F</li> <li>&gt; 140 F</li> <li>&gt; 200 F</li> <li>PHYSICAL STA</li> <li>SOLID</li> <li>X POWDER</li> </ul>		☐ YES X NO C <2 C >2 - <4	<b>рН</b> .9		PH/ GLE IBLE	ASES		
<pre>     &lt; 100 F     100 - 139 F     &gt; 140 F     &gt; 200 F     PHYSICAL STA     SOLID </pre>		☐ YES X NO C <2	<b>рН</b> .9		PH/ GLE IBLE	ASES		
<ul> <li>&lt; 100 F</li> <li>100 - 139 F</li> <li>&gt; 140 F</li> <li>&gt; 200 F</li> <li>PHYSICAL STA</li> <li>SOLID</li> <li>X POWDER</li> </ul>		☐ YES X NO C <2 C >2 - <4	<b>рН</b> .9 .9		PH/ GLE IBLE	ASES		
<pre>     &lt; 100 F     100 - 139 F     &gt; 140 F     &gt; 200 F     PHYSICAL STA     SOLID     SOLID     X POWDER     SLUDGE </pre>		YES X NO 2 < 4 X >5 - <9	<b>рН</b> .9 .9		PH/ GLE IBLE	ASES		
<ul> <li>&lt; 100 F</li> <li>100 - 139 F</li> <li>&gt; 140 F</li> <li>&gt; 200 F</li> <li>PHYSICAL STA</li> <li>SOLID</li> <li>X POWDER</li> <li>SLUDGE</li> <li>LIQUID</li> <li>LIQUID/SOLID</li> </ul>		YES X NO YES X NO 2 - <4 X >5 - <9 > 10 -	<b>рН</b> .9 .9		PH/ GLE IBLE	ASES 		
<pre>     &lt; 100 F     100 - 139 F     100 - 139 F     &gt; 140 F     &gt;200 F     PHYSICAL STA     SOLID     SOLID     SLUDGE     LIQUID     LIQUID/SOLID     F. TCLP </pre>		YES X NO YES X NO 2 - <4 X >5 - <9 > 10 -	<b>рН</b> .9 .9		PH/ GLE IBLE	ASES		
<ul> <li>&lt; 100 F</li> <li>100 - 139 F</li> <li>&gt; 140 F</li> <li>≥ 200 F</li> <li>PHYSICAL STA</li> <li>SOLID</li> <li>X POWDER</li> <li>SLUDGE</li> <li>LIQUID</li> <li>LIQUID/SOLID</li> </ul>	TE	<ul> <li>YES</li> <li>X NO</li> <li>2</li> <li>2 - &lt;4</li> <li>X &gt;5 - &lt;9</li> <li>&gt;10 - &lt;</li> <li>&gt;12.5</li> </ul>	рН .9 :12.4		PH/ GLE JBLE TI			
<pre>     &lt; 100 F     100 - 139 F     100 - 139 F     &gt; 140 F     X &gt; 200 F     PHYSICAL STA     SOLID     SOLID     SLUDGE     LIQUID     LIQUID/SOLID     F. TCLP     TCLP </pre>	TE Actual Valu	<ul> <li>YES</li> <li>X NO</li> <li>2</li> <li>2 - &lt;4</li> <li>2 &gt;2 - &lt;4</li> <li>X &gt;5 - &lt;9</li> <li>10 - &lt;</li> <li>&gt;12.5</li> </ul>	рН .9 .9 :12.4 el UM		PHA BLE TI Actual Val		Reg. Leve	
☐       < 100 F	TE Actual Valu 5	YES X NO 2 <2 >2 - <4 X >5 - <9 >10 - < >12.5	рН .9 :12.4 el UM MG/L   BARIUM T		PHA BLE TI Actual Val		Reg. Leve 100.0	M
☐       < 100 F	TE Actual Valu 5 1	YES X NO 2 < 4 X >5 - <9 >10 - < >12.5 ae Reg. Leve < 5.0 < 1.0	рН .9 :12.4 el UM 		PHA JEE JBLE TI Actual Val	ue >	Reg. Leve 100.0 5.0	N
☐       < 100 F	TE Actual Valu 5 1 5	YES         X         NO         2         >2 - <4	pH .9 .9 :12.4 el UM MG/L BARIUM T MG/L CHROMIU MG/L MERCUR		PHA JEE JBLE TI Actual Val 100 5 .2	ue > <	Reg. Leve 100.0 5.0 0.2	N N N
<pre>     &lt; 100 F     100 - 139 F     100 - 139 F     &gt; 140 F     &gt;200 F     PHYSICAL STA     SOLID     SOLID     SLUDGE     LIQUID     LIQUID/SOLID     F. TCLP </pre>	TE Actual Valu 5 1	YES X NO 2 < 4 3 > 2 - 44 X >5 - 99 10 - < >10 - < >12.5 ae Reg. Leve < 5.0 < 1.0	pH .9 .9 :12.4 MG/L BARIUMT MG/L CHROMU MG/L MERCUR MG/L SILVER TO		PHA JELE JBLE TI Actual Val <u>100</u> 5 <u>2</u> 5	ue >	Reg. Leve 100.0 5.0	

•

6

•

# لمن 2008 L

÷

. 1

# Envirite Waste Material Profile Sheet

Profile: 16344

CHLOROFORMTCLP	6	<	6.0	MG/L	O-CRESOL TCLP	200	<	200	MG/L
M-CRESOL TCLP	200	<	200	MG/L	P-CRESOL TCLP	200	<	200	MG/L
CRESOL TCLP	200	<	200	MG/L	2.4-D TCLP	10	<	10	MG/L
ENDRIN TCLP	.02	<	0.02	MG/L	HEPTACHLOR (AND ITS EPOXIDE	.008	<	0.008	MG/L
HEXACHLOROBENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLOROBENZENE TCLP	7.5	<	7.5	MG/L
HEXACHLORO-1,3 BUTADIENE TI	.5	<	.5	MG/L	HEXACHLOROETHANE TCLP	3	<	3	MG/L
NITROBENZENE TCLP	2	<	2	MG/L	LINDANE TCLP	.4	<	0.4	MG/L
METHOXYCHLOR TCLP	10	<	10	MG/L	METHYL ETHYL KETONE TCLP	200	<	200	MG/L
PENTACHLOROPHENOL TCLP	100	<	100	MG/L	PYRIDINE TCLP	5	<	5	MG/L
TETRACHLOROETHYLENE TCLP	.7	<	0.7	MG/L	TOXAPHENE TCLP	.5	<	0.5	MG/L
1,2-DICHLOROETHANE TCLP	.5	<	0.5	MG/L	1,1-DICHLOROETHYLENE TCLP	.7	_ <	.7	MG/L
2,4-DINITROTOLUENE TCLP	.13	<	.13	MG/L	2,4,5 TRICHLOROPHENOL TCLP	400	<	400.0	MG/L
2,4,6 TRICHLOROPHENOL TCLP	2	<	2.0	MG/L	2,4,5-TP (SILVEX) TCLP	.2	<	0.2	MG/L
VINYL CHLORIDE TCLP	.2	<	0.2	MG/L					
NONE			_		%				
NONE					<u>%</u>				
H. Chemical Compositio	n								
Chemical									
Other			L	ow	High UM				
Barium					> 100 PPM				
Bag House Dust					= 100 %				
Is this a RCRA Hazardous	waste p	er 40 (	CFR 261	or equiv	alent State Regulation? Yes		•		
Is this a Listed Hazardous									
	•			•	or equivalent State Regulation?	Yes			
I. Waste Codes					<del></del>				
D005 Barium									
J. Generation Informatio	n								
	TALLICS. S	SILICAB	NDER CLE	AN UP ARC	OUND MIX PIT THAT MAKES FLUX FOR WEL	DING ROI	DS.		
Generating MINERALS, ME Process:									

03 JUF	2008 Waste	Envirite Material Profile Sheet Profile: 16343	Page 3 of 4
· <b>K</b>	K. Waste Characteristics		
	Insecticides		Carcinogen
	Shock Sensitive	Dioxin 🔄	PCB's:
	Pesticides 🗌	Pyrophoric 🗌	RX Cyanide >250ppm 🛄
	Herbicides	Household Waste: 📃	RX Sulfide >500ppm
	Radioactive:	Crystalline Free Silica 🗌	(Unless Checked) None Apply Y
	Medical Waste 📃	Explosive	Other (specify)
	Oxidizers 🗌	Asbestos:	
	Additional Information		

.

. •	Envirite	
AUL 2008	Waste Material Profile Sh Profile: 16343	Page 4 of 4
L. Regulatory Characteriz	ation	
<ul> <li>IS THIS A WASTEWATER PER</li> <li>IS THIS A NON-WASTEWATE</li> <li>UNIVERSAL WASTE</li> <li>CHARACTERISTIC SLUDGE</li> <li>VIRGIN UNUSED PRODUCT</li> <li>Y SPENT MATERIAL</li> <li>WASTE HAS BEEN TREATED</li> <li>CYANIDE PLATING ON SITE</li> <li>SUBSTITUTE COMMERCIAL I</li> <li>(Mark ALL conditions that apply, a blank res</li> <li>This form must be signed by Profile is a broker or other a notification (on generator let)</li> </ul>	R 40CFR 268       BY PR         R PER 40 CFR 268       RXWI         Y       DOES         CONT.       Y         Y       DOES         CONT.       Y         POLLU       INDUS         Product       INDUS         Product       Industry         Product       Industry         Product       Industry         Product       Industry         Product       Industry         Industry       Industry         Product       Industry         Industry       Industry	enerator. If the individual signing the Waste the waste, the generator must provide written
I hereby avow that any per	tinent information that is known by th at, to the best of my knowledge, all st	e generator conerning possible hazards h atements and attachments are correct and
Signee Name	Signee Date	Signee Title
ALAN JONES	7-10-08	PLANT ENGINEER
Signature <u>Alan</u> J	Company	Special Metals Welding Produ
Date of Sampling: Sampler Name:		Time of Sampling: AM/PM
Sampler Signature:		
Title and Affiliation of Sam	pler:	

•

AY-13	-2009-WED 11:48	AM ENVIRI	te of penn	FAX No. 717 854 6757	P. 001
Š.				· . · . ·	· .
					•.
				n\/IBITE	· · · ·
				nvirite	· · ·
•			TECH	NOLOGY FOR THE ENVIRONMEN	
•					
	•		Envirite of P 730 Vogels York, P/	song Road	• .
• .			· · ·		•
•		•	FAX CÔVE	R SHEET	• •
• •			FAX No.: (71	7) 854-6757	
· ·.	· .		· ·	Date: MAY 13,2	200
•				Date: 101019 1512	<u>, , , , , , , , , , , , , , , , , , , </u>
	To:	Hewit	t LINVAR	2d	• • •
	-		1	welding produc	ts ·
	FAX Number:	•	65-3447	<b>V</b>	
: '	From:	-	1 Wood		, , , , , , , , , , , , , , , ,
				AX (747) 846 4000 Ext .	203
		•			205
	Number of pag				
	Regarding: M	anitests	• • • • • • • • • • • • • • • • • • • •	ب 	,
	If you do not roo		number of page	es transmitted, please call us	20 6000 00
	possible at (717)				as soon as
	Time of Transm	nission:	·		
	Sent by:	. <u>.</u>			· ··· · · · · · · · · · · · · · · · ·
		•		·	
			let me	KNOW IF YOU	
				ything else!	
				a good day!	·

•

•

.

.

fexcover.doc

.

.

.

# MAY-13-2009-WED 11:49 AM ENVIRITE OF PENN

•

÷.

5

Ŧ١

# FAX No. 717 854 6757

P. 002

••• ••

DILAIL

Ple	ase print or type. (Form designed for use on elite (12-pitch) typewriter.)
Î	UNIFORM HAZARDOUS NCD980841951 2. Page 1 of 3. Emergency Response Phone 828-464-0352 001992371 FLE
	5. Generator's Name and Mailing Address Special Metals Weiding Products 1401 Burtis Road
	Newion, NC 28658 Generators Phone: 628-465-0352
	6. Transporter 1 Company Name Envirite of Pennsylvania, Inc. PAD010154045
	7-Thissporter 2 Company Name U.S. EPA ID Number
	6. Designated Facility Name and Site Address Environme and Site Address T30 Vogelsong Road York, PA 17404 Facilitys Phone: 800-878-1618
	Facility's Phone:       BUU-5/8-1638         ga,       80. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number,       10. Containers       11. Total       12. Unit         HM       and Facking Group (if eny))       1       No.       Type       Quantity       WL/Vol.
<b>GENERATOR</b> -	
GENE	x <sup>2</sup> RQ, Hazardous waste, solid, n.o.s., 9, NA3977, PG III (D005) 008 DM 659 D005
	X <sup>3</sup> RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG #1(D005) 1 DM 55 P D005
÷	14. Special Hanoling Instructions and Additional Information.         1. EW Approval # 16342 File Ref. # 14853 ERG 171         Box#           2. EW Approval # 16343 File Ref. # 10827 ERG 171         Box#           3. EW Approval # 16344 File Ref. # 10828 ERG 171         Trailer # 3003 /
,	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are hilly and accurately described above by the proper shipping name, and are classified, packaged, merked and labeled/placended, and are in all respects in proper condition for trainsport according to applicable internalized and netional governmental regulations. If exports shipment and light the contents of this consignment conform to the terms of the attached EPA Actnowedgment of Consent. I cently that the contents of this consignment conform to the terms of the attached EPA Actnowedgment of Consent. I cently that the contents of this consignment identified in 40 CFR 252 27(a) (if I am a large quantity generatory or (b) (if I am a small quantity generator) is true. Generators/Offeror's Printed/Typed Name Mortin Day Year
ļ	Shannon Lril 18. International Shipments
INT	Transporter signature (for exports only):
TR ANSPORTER	17. Transporter Acknowledgment of Receipt of Markenials Transporter Aringed Name SAMES 6, MILLER, JR. Signature JAMES 6, MILLER, JR. Juw J. M.Y. 940907
<b>R ANS</b>	Transponar 2 Printed/Typed Name Signature Month Day: Mear
Ť	18. Discrepancy
	18a. Discrepancy Julication Space     Quantity     Type     Residue     Partial Rejection       3145     4345     433     Manifest Reference Number:
FACILITY	18b. Atlamate Facility (or Generator) U.S. EPA ID Number
ED FA(	Facility's Phona: 18c. Signature of Alternate Facility (or Generator) Year : Month Day Year :
DESIGNATED	19. Hazardous Waste Report Management Mathod Codes (18., codes 10/f)szardous waste treatment, disposal, and recycling systems)
- DES	1 HIII 2 HIII 4
	20. Designated Facility Owner or Operator. Certification of receiptor hazardous materials covered by the manifest except as noted in heart 18s Printed/Typed Name Month:
↓ F₽	KIRBY E HEN 3001- A Form 8700-22 (Rev. 2-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE ILF REQUIRED
	DESIGNALED FACILITY TO GENERATUR STATE

# MAY-13-2009-WED 11:49 AM ENVIRITE OF PENN FAX No. 717 854 6757 P. 003

•

is.	and the second					D 14	37/	
Pleas	se print or type. (Form designed for use on elite (12-pitch) typewriter.)					n Approved. (	MB No. 2	050-003
111	UNIFORM HAZARDOUS 1. Generator JD Number 2. Page 1 of 3. Em WASTE MANIFEST NCD980841951 1 5. Generator's Name and Maing Address Generator's Name Address Generato	828-44 828-44	64-035		199	274	0 F	LE
	Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Generators Phone: 828-465-0352	, <b>609 (1977) - 19</b>	(n culorant ar	ait timuð sære:				•
	6. Transporter 1 Company Name			U.S. EPAID				
	Envirté of Pennsylvania, inc. 7. Transporter 2 Company Name			U.S. EPAID N		54045		
	8. Designated Facility Name and Site Address			U.S. EPAID I	lumber			
	Envirite of Pennsylvania, Inc. 730 Vogelsong Road York, PA 17404 Facilitys Phone: 800-878-1618			PA	D0101	54045	_	Emile 1
	9a. Sb. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, HM and Packing Group (if any))	10. Contair No.	nens Type	11. Total Quantity	12. Unit WLNol,	· 13. W	/asie Codes	•
ATOR -	1. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG II (D005) X	00/	DM	EST	$\mathcal{P}$	0005		
	TRO Wools Remmeble liquids, mus. (Weiting Elby Kotore, Elbanoli, 3 JIN 1993, PGII (D001 D035)	170y	- DM-			-0001-	<b>DC3</b> 5	÷
	RO, Hezardous waste, liquid, n.o.s., 9, NA3082, PG fil (D005)			EST		D005		120.8
	X (3)	0.4	DM	3800	P			
	RQ, Hazardous waste, solld, n.o.s., 9, NA3077, PG III (D005)	002	D₩	1400	P	-D005	· · · ·	
	14. Special Handing Instructions and Additional Information 4/1 ARC ARC ESTIM 1. EW Approval # 16344 File Ref. # 10828 ERG 171 2. EW Approval # 14822 File Ref. # 10823 ERG 171 3. EW Approval # 16342 File Ref. # 14853 ERG 171 4. EW Approval # 16343 File Ref. # 10827 ERG 171	PGP			. 1	lox# miler#	300	s¥
	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully marked and labeled/pleasided, and are in all respects in proper condition for theirsport according to applicable in Exponer, Learlify that the contents of this consignment conform to the terms of the attached EPA Action/Isogment conformation to the terms of the attached EPA Action/Isogment conformation to the terms of the attached EPA Action/Isogment conformation to the terms of the attached EPA Action/Isogment conformation to the terms of the attached EPA Action/Isogment conformation to the attached EPA Ac	amational and national and nati	onal governm	ental regulations.	ipping name If export at	e, and are class ripment and 1 ar	lifed, packa In the Prime	ged, ry . 
Ţ	Generator's United Typed Name Signature	Thyn	J			Monti	n Day	Year
Z	16. International Shipments Import to U.S. Export from U.S.	Port of ent Date leaving					· · ·	
PORIE	17. Transporter Acknowledgment of Receipt of Metarials Transporter   Printed/Typed Name SAMES E, MILLER, JR.	hun	P	MUL	•••	Mont		Year
TR ANSPORTER	Transporter 2 Printed/Typed Name Signature			, <u>, , , , , , , , , , , , , , , , , , </u>		Mont	- Day	Year 1
t I	16. Discrepancy	_,						
	The Discrepancy Indication Space Quantity Type	La Residue Mainifest Reference	11	Pential Rej	ection	. L	J Full Rejac	tion
FACILITY	18b. Alternate Facility (or Generator)	Mannest Kerenence	·	U.S. EPA ID N	lumber			
	Facility's Phone: 18c. Signature of Atemate Facility (or Generator)			1	:	Mont	h Day	Yes
<b>S</b>	19, Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and re	Interfacts eventures					1	<u> </u>
	13, helenous waste report metragement metros codes (n.e., codes nor nazerodus waste beaunein, doptase, and re 1			4.			<del></del>	معنو 
	20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest exc Printed/Typed Name	ept as noted in Item	) 16a	 		Mont	n Day	Year
$\downarrow$	KIRGY E NEWSWORD -1 M2 Form 8700-22 (Rev. 3-05) Previous editions are obsolete.		GNATED I	ACILITY TO	GENER	0/	123	109 JUIREI
			where a		. 1	· · · · · · · ·		· · · ·

# MAY-13-2009-WED 11:50 AM ENVIRITE OF PENN FAX No. 717 854 6757 P. 004

• • • • •	
	70558
Please print or type. (Form designed for use on elite (12-pltch) typewriter.)	Form Approved. OMB No. 2050-003 3. Emergency Response Phone [4. Manifest Tracking Number
WASTE MANIFEST NULD920841951	828-4/24-0352 001990976 FIF
5. Generator's Name and Mating Address SPECIAL METHOS WED 1401 BURRIS RD- 200-14- DELATON, NC, 286	enerator's Sile Address (Adifferent man melling address)
LEWTON, NC, 286	56
Generator's Plioner Salar 105 - 035 at 1	U.S. EPA ID Number
ENVIRE OF PENNSYLVANIA,	
7. Transporter 2 Compony Name	U.S. EPA ID Number
	1
8. Designated Facility Warte and Site Address GNUIRITE OF PENNSY. 1950 UDSELS ONS RPI	LANA, INC. U.S. EPAID Number
ASO VOSES ONS RM	
Facility's Phone 1118461900 YORK, PA. 11	104 PADO10154045
ga.         9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, MM           HM         and Packing Group (if any))	10. Containera 11. Total 12. Unit No. Type Quantity WUVol. 13. Waste Codes
E RIQI HRARDOUS WASTE LIQUID, NIL	
X 91NAS082, ATTL CARE)	002 DM 1600 P
RIDIHAZARDOUS WASTE SOLED, NO,	
A BUASONN, PSTU. (Doos)	003 0m 2400 P
Y 9, NASOM, ITT (DOOS)	
UNIVERSAL WASTE, NOW HAZA	00101 8001
(SODIUM WAPOR BULBS)	DOIDM NOP
$\frac{1}{2} + \frac{1}{2} + \frac{1}$	3) Exturally - ERSTON
	TECH TECH
982) EW#16343 - ERS, #101 98	JEWF H927 18111
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment a marked and labeled/placarded, and are in all respects in proper coodition for transport according to applic	ble International and national governmental regulationa. If export shipment and tam the Primary
Exporter, i centify that the contants of this consignment conform to the terms of the attached EPA Acknowle I centify that the waste minimization assement identified in 40 CFR 262-27(a) (if I am a large quantity gene	
Generators/Offerdrs Frinded/Typed Name	Bura Month Day: Year
HEWITT LINUARD	12 B 10
Import to U.S.     Export from U	.S. Pon of entry/axit
Transporter signature (for exports only):	Date leaving U.S.
17. Transporter Advaceded ment of Receipt of Materials	
Transporter & Printed Typed Name	ture & Mille V20808
Transporter 2 Printed/Typed Name Sign	avri Morth Day Yest
18a Diographics Indication Space	the second se
Quantity Intradict of the guantity	Residue Partial Rejection
E 18b. Alēmeté Facility (or Generator)	Manifest Reference Number: U.S. EPA ID Number
18b. Atkémeté Facility (cr.Generator)	
18. Hazardovs Wasis Report Manegement Method Codes (i.e., codes for hazardous vaste treatment, disposed     1	Month Day Year
19. Hazardous Waste Report Manegement Method Codes (i.e., codes for hazardous waste treatment, disposel	
	HI4
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manife	
	ature
EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.	DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED
(* EFA FOIM 8100-22 (Nev. 3-03) FIBVIDUS CONUCIS ALF ODSOLERE.	

### MAY-13-2009-WED 11:51 AM ENVIRITE OF PENN

.

•

÷

# FAX No. 717 854 6757 P. 005

D11433

Please p	rint or type, (Form desig	ned for use on elite (	12-pitch) typewriter.)	· ·							Approved.		2050-0039
	FORM HAZARDOUS	1. Generator ID Numbe NCD98	5841951		2. Page 1 of : 1	3. Emergen	828-46	4-035			3314	7 F	키도
5.G	enerator Name and Mailin Special Metal 1401 Burris R Newton, NC 2 herator's Phone: 828-	s Welding Pr	oducts	<b>-</b>		-Generator's	She Addrees (	if different th	an maling addres			<u> </u>	•
	ranaponer 1 Company Nan Envirite of Per	ne			<b>!</b>	<u> </u>		<u></u>			54045		•
7.1	ransponer 2 Company Nan					<u></u>			U.S. EPAID N	lumber			
111	Envirile of Per Envirile of Per 730 Vogelsor Vork, PA 1749 Hry's Phone: 800-8	nnsvivania. Ir							U.S. EPAID N PAI		54045		
9a. HM	9b. U.S. DOT Descript	ion (including Proper Shi	pping Name, Hazard C	lass, ID Number,		-	10. Contain No.	iens Тура	11. Total Quantity	12. Unit WLVOI.	13.	Waste Code	28
GENERATOR -		ammable liquid UN1893, PG11 (		yl Ethyl Keto	ire,	•	602	DM	110	6	D001	:D035	
	2. RQ, Hazardo	us waste, liquid	;n.0.6., 9 , NA3	1082, PG 11	(D005)		50	DM	385	6	D005		
X		us waste, solid,	n.o.s., 9 , NAS	077, PG 11)	(D005)		۰6	ĎМ .	330	·6: .	D005		
	<sup>4.</sup> RQ, Hazardo	us waste, solid	nós. 9 NA3	077, PG III (	(D005)		٥٦	DM	25F 700	P	D0052		
14.	Special Handling Instruction A. EW Approva B. EW Approva C. EW Approva D. EW Approva	# 14922 File   # 16342 File   # 16343 File	Ref. # YS436 Ref. # 14853 Ref. # 10827	ERG 171 ERG 171	•	· · ·					ox# raller#	300	67
	GENERATOR'S/OFFER( marked and labeled/place Exporter, I cartify that the I certify that the waste min erators/Offerors Printed/T	DR'S CERTIFICATION: arded, and are in all resp contents of this consigning nimization statement de	Thereby declare that a edd in proper condition nem conform to the ter	he contents of this worth transport account for the stacker	consignment arding to appli d EPA Acknow	icable internat wiedgment of (	ional and natk Consent.	nai governm	nental regulations.		hipment and I		any '
4	International Shipments	(. (A			Export from	//- dis.		JD ny/eXit:	 		<u>[]</u>	1 119	
	msporter signature (for exporter signature (for exporter Acknowledgme	nt of Receipt of Materials					Date leavin	ng U.S.					· ·.
IO IS	nsporter 1 Printed/Typed Na	HIE	JSh	<u>o</u> t+		grature	$\mathcal{I}$	L.	Sho	A	/	1 14	108
TRAN	nsporter 2 Printed/Typed Na	ene .			S. 200	gnature	• • •				ты .	mth. Daÿ	'Year
	Discrepancy a. Discrepancy Indication Sp			Плуре		<u>ः ।</u> भुः । न	Residue	•					
,	159# 1193#	3495 <sup>#</sup> 13	35 <sup>4</sup>				estReference	Numbers	Partial Rej	ecton .		Ful Rej	ecoon :
	). Allemats Facility (or Gene	rator)				ţ.	· ·		U.S. EPAID N	lumber			
	Hity's Phone: 	Xility (or Generator)			57 P. 5.							onth Da	y Year
GNAT		· · ·	he fine and a factor		in in incom	· ·						:4:	
1. 1.	Hazardous Weste Report N	2	HII	2 (1997) 2 (	3.	H)	:	~~~	4.	4 <i>n</i>			·;
	Designated Facility Owner ned/Typed Name	or Operator: Carolication	of receipt of hazardou	is misterials covere				18a	1	2		nth Day	Year
	KIRBY E	KENSU		· ···		12	10	· Al		•••••		1.14	108
EPA Fon	m 8700-22 (Flev, 3-05)	Previous editions are					. Desi	GNATED I	FACILITY TO	GENER	ATOR STA	TE (IF RE	OUIRED)

MAY-13-2009-WED 11:51 AM ENVIRITE OF PENN FAX No. 717 854 6757

P. 006

	م من من من من المنتخب ا المنتخب المنتخب		.,	xj		ī	)50	75	$\widehat{P_{1}}$	507	十	
өзşе ргі	int or type. (Form desig	ined for use on el	te (12-pitch) typewriter.)	)		·			Form	Approved.	OMB No. 2	050-00
W§	FORM HAZARDOUS		CD98084195	1	1 8=		-0357	* *		367:	19 F	LE
Беле	Ingrator's Name and Mall Special Metal 1401 Burris R Newion, NC 2 arator's Phone: 828-	s Welding i oad 8658 405-03 <u>52</u>	Products		Ganer	ator'a Site Address   •	(i diterent in	-				-
	Envirte of Per		Inc.							54045		\$
	ansporter 2 Company Nan		<u></u>	: <u></u> _				V.S. EPAID N	umber			
	signaled Facility Name ar Envirite of Per 730 Vogelson York, PA 1740 ity's Phone: 800-81	nevlvania.	inc.	· · · ·		ŗ		U.S. EPAID N PAD		54045		
9а. НМ		ion (including Proper	Shipping Name, Hazard Cl	less, ID Number,		10. Contain	ners Type	11. Totel Quantity	12. Unit WL/Vol.	13.	Waste Codea	1
X	<sup>1</sup> RQ, Waste Fl Ethanoi), 3, 1	ammable liq JN1993, PG	ulds, n.o.s. (Meth) 11 (D001, D035)	z Ethy Kotone	анан (с. н. 1	-1-	DM	OD	P	D001	D035	-
X		ARDOL	5 WASTE	•		007	ÔM	6163	P	0005		 }
X	3. R. Q. HA NIOS, 9,	ZAR OL NASO 13	AS WAS	2005]		006	OM	3:088	β	Û205	·	
X	ARIQ, HAZ 9, NASO	ZAKDOU 10, P.L.	TT, (DDC	5) 🐔	UPIS	002			P	0005 0120		
15.	EW Approval	# 14922 Fi ////////////////////////////////////	ie Ref. # YS436 SSPH)R N: (hereby declare think the respects in proper condition	ha contents of this cor		v and accurately de	schibed above	by the proper sh		ox# ziler# /\$7 3, and are cla		
	Exporter, I centry that the	contents of this con nimization statement	signment conform to the ler Identified in 40 CFR 2622	ms of the attached E (7(a) (f Cam a laige g	PAAC(nowledgm uantity generator) Signature	ant of Consent.				· · · ·	nth Day 7   2	Yes
Tran	nternational Shipments Isporter signatura (for skp	Import.	to U.S.		contron U.S.	Port of en Date (Sav			•			
	iransporter Acknowledgme aporter Printed/Typed Na TAMES	ame	MILLER	s, A	Signatura	Tom	Set	MY-	<b></b> .			Provide state
	sporter 2 Printed/Typed Na	eme. '		· · · · · · · · · · · · · · · · · · ·	Signature	/ ·			·	. Mo	nth Day	Yea
	Discrepancy Indication Sp 95. 6419.#	7225		П Туре	:	Residue		Partial Rej	ecilion		Full Refe	 cion
18b.	Alternate Facility (or Gene	1575C				Manifest Reference		U.S. EPAID N	tumber	·		
	ity's Phone: Signature of Alternete Fac	ility (or Generator)	· · ·							M	onth Day	Yei
18c. 1 19. H	Hazardous Wasle Report N $H/I H/I$	Aanagement Method	Codes (i.e., codes for hazz	ardous waste treatme	nt, disposal, and ( 3.	recycling systems)		4.	411 )	 		
									<u> </u>			

2007 Haz Waste Volume Date for 2007' RCRA Biennial Haz. Waste Report Summa Vendor our ref # Quantity Permafix 225 4,400 #= 31,640 # 227 Envirite 10,700 # Envirite 228 13,780 10,743 Ż29 Envinite 9,680 . 11 231 234 11,025 11 78,188 

FULL	REPORT - FILE C	OPY	OMB#: 2050-0024 Expires 11/30/2009							
MAIL THE COMPLETED FORM TO: The Appropriate EPA Regional or State Office	United States Environmental F RCRA SUBTITLE C SITE IDENT									
1. Reason for Submittal and Status of Information Supplied (see instructions on page 9) MARK ALL BOX(ES) THAT APPLY	To provide subsequent notification (to update site identification) As a component of a First RCRA Hazardous Waste Part A	<ul> <li>To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).</li> <li>To provide subsequent notification (to update site identification information).</li> <li>As a component of a First RCRA Hazardous Waste Part A Permit Application.</li> <li>As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #).</li> </ul>								
2. Site EPA ID Number (see instructions on page 10)	EPA ID Number: NCD980841951									
3. Site Name (see instructions on page 10)	Name: SPECIAL METALS WELDING PRODUCTS									
4. Site Location Information (see	Street Address: 1401 BURRIS ROAD									
instructions on page 10)	City, Town, or Village: NEWTON	State: NC								
	County Name: CATAWBA Zip Code: 28658-1754									
5. Site Land Type (see instructions on page 10)	Site Land Type: XPrivate County District Federal Indian Municipal State Other									
6. North American Industry Classification System (NAICS) Code(s)	A. 331491	·								
for the Site (see instructions on page 10)										
7. Site Mailing Address (see instructions on	Street or P.O. Box: 1401 BURRIS ROAD									
page 11)	City, Town, or Village: NEWTON		State: NC							
	Country:		<b>Zip Code:</b> 28658-1754							
8. Site Contact Person (see Instructions on	First Name: ALAN	MI: E	Last Name: JONES							
page 11)	Phone Number: (828)465-0352 Extension: 2	Email: AJONES@SMWPC.COM								
9. Legal Owner and Operator of the Site (see instructions on pages 11 and 12)	A. Name of Site's Operator: SPECIAL METALS WELDING PRODUCTS	Date Became Operator (mm/dd/yyyy): 11/26/2003								
	Operator Type: 🛛 Private 🗋 County 🗋 District 🗌	Federal	Indian Municipal State Other							
	B. Name of Site's Legal Owner: HUNTINGTON ALLOYS	-								
	Owner Type: Private County District	Federal	Indian Municipal State Other							

# EPA ID No. NCD980841951

•

.

OMB#: 2050-0024 Expires 11/30/2009

5. Legal Owner (Continued)	Street or P.O. Box: 3200 RIVERSIDE DRIVE							
Address	City, Town, or Vil	lage: HUNTING	ron					
	State: WV	<b>Zip Code:</b> 2570	6-	Country:				
10. Type of Regulate Mark 'X' in the a			"No" for	each choice. (See instructions on pages 13 to 16)				
A. Hazardous V Complete al	Vaste Activities I parts for Items	1 through 6.	F	or Items 2 through 6, check all that apply:				
Y X N 1. Generator of Ha	azardous Waste nly one of the follow	ring - a,b, or c.	Y [] N 🕅	2. Transporter of Hazardous Waste				
X a. LQG: Greater of non-acute haza	ardous waste; or		Y [] N 🕅	3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity				
of non-acute haza		2,200 100.7	Y [] N 🕅	4. Recycler of Hazardous Waste (at your site)				
c. CESQG: Less of non-acute haza				Note: A hazardous waste permit may be required for this activity.				
In addition, indicate (check all that app		ctivities	5. Exempt Boiler and/or Industrial Furnace					
Y 🗍 🕅 d. United States Ir	nporter of Hazardous	Waste	_	N 🛛 a. Small Quantity On-site Burner Exemption				
Y 🗌 🛛 🔀 e. Mixed Waste (h	azardous and radioad	ctive) Generator		6. Underground Injection Control				
			<u> </u>					
B. Universal Waste Activitie	S		с	Used Oil Activities - Mark all boxes that apply				
1. Large Quantity Handler of U [refer to your State regulation types of universal waste ge at your site. (check all box	ons to determine wha nerated and/or accun	t is regulated]. Indicat		NX 1. Used Oil Transporter If "Yes", mark each that applies. a. Transporter b. Transfer Facility				
a. Batteries b. Pesticides c. Thermostats d. Lamps e. Other f. Other g. Other			Y[	<ul> <li>NX 2. Used Oil Processor and/or Re-refiner - If "Yes", mark each that applies.</li> <li>a. Processor</li> <li>b. Re-refiner</li> <li>NX 3. Off-Specification Used Oil Burner</li> <li>NX 4. Used Oil Fuel Marketer If "Yes", mark each that applies.</li> </ul>				
Y ] N X 2. Destination Facili Note: A hazardous waste	ity for Universal Wa			<ul> <li>a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner</li> <li>b. Marketer Who First Claims the Used Oil Meets the Specifications</li> </ul>				

.

•

•

11. Description of Hazardous Waste							- <u></u>
A. Waste Codes for Federally Regula List them in the order they are presented	ated Hazar ed in the re	dous Wastes gulations (e.g	. Please list th ., D001, D003, F007	e waste codes o , U112).  Use an	f the Federal haza additional page if	rdous wastes more spaces	handled at your site are needed.
005							
				-			
	_						
						·····	<u> </u>
. Waste Codes for State-Regulated andled at your site. List them in the order the orde	(i.e., non- ney are prese	Federal) Haza ented in the regu	ardous Wastes. Ilations. Use an additio		vaste codes of the St aces are needed for		azardous wastes
	-					<u> </u>	
	_						
		<u> </u>					
2. Comments (see instructions on	page 17)						
AJONES@SMWPC.COM				·	<u> </u>		
13. Certification. I certify under penal: system designed to assure that qualified per manage the system or those persons direct accurate and complete. I am aware that ther violations. (see Instructions on page	sonnel prop v responsible e are signifig	erly gather and e e for gathering th	valuate the information the information, the infor	submitted. Based on mation submitted is	on my inquiry of the p to the best of my kn	erson or perso owledge and be	ns who elief, true,
Signature of owner, operator, or an authorized representative	ı	Name	and Official Title (	ype or print)			D. Date Signed (mm-dd-yyyy)
	AI	LAN E JON	IES				03/28/2008
		PLANT	ENGINEER				
<u> </u>							
			- <u> </u>				
							<u> </u>
		<u></u>					

SITE NAME SPECIAL METALS WELDING PH 1401 BURRIS ROAD	RODUCTS	A States	U.S. ENVIRONMENTAL PROTECTION AGENCY 2007 Hazardous Waste Report			
NEWTON, NC 286581754 EPAID NO: NCD980841951		FORM GM	WASTE GENERATION AND MANAGEMENT			
Sec. 1 A. Waste BARIUM CONTA Description	INING COMPOUN	ND FROM WELD	ING FLUX MANUFACTURING			
B. EPA Hazardous Waste Code D005		C. State Haz	ardous Waste Code			
D. Source Code G09	E. Form Code	F. Qua	antity Generated in 2007 G. UOM 1			
Management Method code for Source code G25	W319		Density 78,188.00 0.00 lb./gal.			
Sec. 2 Was any of this waste managed on-s	ite? N	<u>о</u>				
ON-SITE PROCESS SYSTEM 1		ON-SITE PI	ROCESS SYSTEM 2			
On-site process system type Quantity tre on-site in 2	eated, disposed, or recy 2007	cled On-site pro type	cess system Quantity treated, disposed, or recycled on-site in 2007			
Sec. 3 A. Was any of this waste shipped off	site in 2007 for treatme	nt, disposal, or recycli	ng? Yes			

Site #	B. EPA ID No. of facility to which waste was shipped	C. Off-site Management Method code shipped to	D. Total quantity shipped in 2007
1	FLD980559728	H141	4,400.00
2	OHD980568992	H141	73,788.00

### EORM OL

SITE NAME	<u></u> ·	and the States	U.S. ENVIRONMENTAL PROTECTION AGENCY
SPECIAL METALS WELDING PRODUCTS BURRIS ROAD NEWTON NC	286581754		2007 Hazardous Waste Report
EPAID NO: NCD980841951	200301734	FORM OI	OFF-SITE IDENTIFICATION

Form 1	A. EPA ID No. of off-s FLD980	ite installation or tran 559728	sporter	B. Name of off-site installation or transporter PERMA-FIX OF ORLANDO						
C. Ha	andler Type		D. A	ddress of off-site install	ation					
	N	Generator	Stre	et 10100 ROCKET BOULEVARD						
	Y Y	Transporter TSDR	City	<b>T</b> T	7:-	32824-				
Form	A. EPA ID No. of off-s	ite installation or tran		B. Name of off-site	Zip Installation or	transporter				
2	OHD980		-	ENVIRITE OF C	DHIO, IN	IC .				
C. Ha	andler Type		D. A	D. Address of off-site installation						

C. Handler Type			D. Address of off-site installation							
	N	Generator	Street	2050 CENTRAL	AVENU	JE, SE				
	Y	Transporter		CANTON						
	Y	TSDR	City State	OH	Zip	44707-				

e 🙀 e pr	int or the (Form de	signed for use on	elite (12-pitch) typewr	iter.)					Form	DILC Approved. ON	•			
	FORM HAZARDOUS	1. Generator ID I			2. Page 1 of 3. E <b>1</b>	mergency Response 828-4	Phone 64-035	2 4. Manifest	Tracking N	12740				
П.,	5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Generator's Site Address (if different than mailing address)													
6. Tra	Envirite of Pr	U.S. EPAID		54045										
7. Tra	ansporter 2 Company N	U.S. EPAID												
8. De	signated Facility Name	and Site Address	· · · · · · · · · · · · · · · · · · ·	•				U.S. EPA ID I	Number					
Facili	Envirite of Po 730 Vogelso York, PA 174 ity's Phone: 800-4	ennsyivani ng Road 104 378-1618	a, Inc.		PAD010154045									
9a. HM		ption (including Prop	er Shipping Name, Haza	rd Class, ID Number,		10. Contair No.	ners Type	11. Total Quantity	12. Unit Wt./Vol.	13. Wa	te Codes			
X	1. RQ, Hazard	nus wasta, s	olld.n.o.s., 9 , N	A3077, PG III	(D005)	00/	DM	EST	P	0005				
			quids, no.5. (%) 311 (0001.0035		me, JEIY	-0-	DM-			-0001-0	:0?5			
x	RQ, Hazard	ous wasta, lie	quìd, n.o.s., 9 , 1	1A3082, PG III	(D005)	004	DM	557- 2800	P	D005				
x			A3077, PG III		002	DM	EST 1400	P	-5095					
	14. Special Handling Instructions and Additional Information JULY DRE ARE ESTIMATES 1. EW Approval # 16344 File Ref. # 10828 ERG 171 2. EVY Approval # 16342 File Ref. # 10827 ERG 120 3. EW Approval # 16342 File Ref. # 14853 ERG 171 4. EVY Approval # 16343 File Ref. # 10827 ERG 171 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper st										2005			
	marked and labeled/pla Exporter, I certify that th	carded, and are in al e contents of this con inimization statements	ION: I hereby declare the respects in proper concernsignment conform to the nt identified in 40 CFR 20	lition for transport acco e terms of the attached	rding to applicable i EPA Acknowledgm	nternational and national and nation of Consent. or (b) (if I am a sma	ional governn	nental regulations						
4	Jillie Log	AN		<u> </u>		he fly m	J			· 1 /	<i>z</i> 2			
	ternational Shipments sporter signature (for ex		t to U.S.		Export from U.S.	Port of ent Date leavin	•				<u>.</u>			
17. Tr	ransporter Acknowledgm	ent of Receipt of Mat	erials		C									
Trans	porter 1 Printed/Typed I AMES porter 2 Printed/Typed I	E. A.	IKLER.	JR.	Signature	Finn	5.1	MY?	, 	Month Month	Day Day Day			
18. Di														
	18. Discrepancy     if       18a. Discrepancy Indication Space     Quantity       Type     Residue   Partial Rejection										Full Reject			
18b. A	2->>         3577         1071         Manifest Reference Number:           18b. Alternate Facility (or Generator)         U.S. EPA ID Number:         U.S. EPA ID Number:													
18b. A	Facility's Phone:													
	Signature of Alternate Fa	cility (or Generator)		<u></u>	<u></u>					Month	Day			
	azardous Waste Report				<u> </u>									
<b>1</b> 9. Ha	1. $2.$ 3. $1.1.1$ 4.													
( ) — — — — — — — — — — — — — — — — — —	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a													
20. De	esignated Facility Owne	r or Operator: Certific	cation of receipt of hazar	dous materials covered	<u> </u>		n 18a			and the second s				
20. De		r or Operator: Certific	ation of receipt of hazar	dous materials covere	d by the manifest ex Signature		n 18a			Month	Day			

### ENVIRITE CORP. 730 VODELCONG ROAD YORK CITY INDUSTRIAL PARK YORK, PA. 17424 PHONE (717) 846 IOM8

#### 10:30 01/27/09

المسلومين المسلحان

STREAM #	1. C. 3.4.4.	an an an an an an an an Araba an Araba. An an
#1 OR055 Ut.	C (7) 73 (1) (2) (3) (2) (3) (4)	
тотан ыт.	COB LDS.	
10:32 01/27/0	5	
No. of Street of		·
	and the second	

#### ENVIRITE CORP. 730 VOGELSONG ROAD YORK CETY INDUSTRIAL FARM YORK, PR. 17424 FHONE (717) 846-1080

#### 10:22 01/27/09

فتسكم يعتب

À

 STREOM #
 # GROSS WE.
 # GROSS WE.

#### ENVIRONE CORFL 730 VOOTLSONG ROGD YORK CITY INDUSTRIAL PORK YORK, PA. 17404 PHONE (717) D46 1000

10:10:38 01/27/09 Content of the state of th

.

STREAM & LO PAS

RI OROSSING. SERVER LEXENCE.

TOTAL WT. 12771 LING.

. 10:34 01/27/05

and the second second

With Realing

1294 (A.S. 1814)

DOSE Please print or type, (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 4. Manifest Tracking Number UNIFORM HAZARDOUS 1. Generator ID Number 2. Page 1 of 3. Emergency Response Phone 1060980841951 828-4164-6355 001990976 FI F WASTE MANIFEST 5. Generator's Name and Mailing Addre Generator's Site Address (if different than r OCIAL METHLS WELDING DEONUCTS OI BURRIS RD-DEUTON, NC, 8.86.58 -035 Generator's Phone: 828-416 6. Transporter 1 Company U.S. EPA ID Number 0101.5404 ENVIR ENNSYLVANI 7. Transporter 2 Company Name 8. Designated Facility Name and Site Address T30 UCSES ONS RAINA, INC. U.S. EPA ID Number Facilitys Phone: 1118461900 YORK, PA. 1140 40010154045 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number 10. Containers 9a. 11. Total 12. Unit 13. Waste Codes 🕻 and Packing Group (if any)) lнм Quantity Wt.Nol No. Туре RIGI HAZARDOUS WASTE LIQUID, NOB. FS 205 GENERATOR 002 ŊΝ 9, NASORZ, PSTTCDass ODC RID, HAZARDOUS WASTE SOLED, NIDIS, leas 003 NASDAD, PSIII (DOOS) רא או RIQ, HAZARDOUS WASTE SOLED, NIDIS, 1, NASDAD, ITT CODOS) Itas DD UNIVERSAL WASTE, NOW HAZARDOS 14. Special Handling Instructions and Additional Information 981) EW 14. 16342- 2544111 Ew# 16343-984 15 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged. marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name Signature Month Dav Year ÷., anti الالماس INNE 12 | B 0,2 16. International Shipments Import to U.S. Export from U.S. Port of entry/exit: Date leaving U.S. Transporter signature (for exports only): 17. Transporter Acknowledgment of Receipt of Materials Transporter 1, Printed/Typed Name Signature Month Dav Year AMES 08 08 Trac Transporter 2 Printed/Typed Name Signatu 'ear 18. Discrepancy 18a. Discrepancy Indication Space Птуре Full Rejection Residue Partial Rejection Quantity jł. Manifest Reference Number: 18b. Alternate Facility (or Generator U.S. EPA ID Number FACII Facility's Phone: 品 18c. Signature of Alternate Facility (or Generator) Month Day Year DESIGNAT 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 4. НЛІ 4141 LH 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month The Day Year , er 12 08 08 EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR





i T

#### ENVIRITE CORP. 730 VOGELSONG ROAD YORK CITY INDUSTRIAL PARK YORK, PA. 17404 PHONE (717) 046-1900

• , •

tr

13:34 12/13/08

STREAM # 16342

#1 GROSS Wt. 1966 LBS.

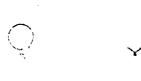
. . . . . .

TOTAL WT. 1966 LBS.

13:35 12/13/08



### ENVIRETE CORP. 730 VOGELSONG ROAD YORK CITY INDUSTRIAL PARK YORK, PA. 174244 PHONE (717) 846-1988 13:31 12/13/08 and the second 16343 STREAM # HI GROSS WE. LESS. #2 GROSS Wt. 673 LBS. TOTAL WT. EESS LDS. 13:34 12/13/08 · · · · Sec. Sec. 1



#### ENVIRITE CORP. 730 VOGELSOND ROAD YORK CITY INDUSTRIAL PARK YORK, PA. 17424 PHONE (717) 846-1980

13:35 12/13/08

a second a second s A Contraction of the at 4 2 1 1 1

16344 STREAM #

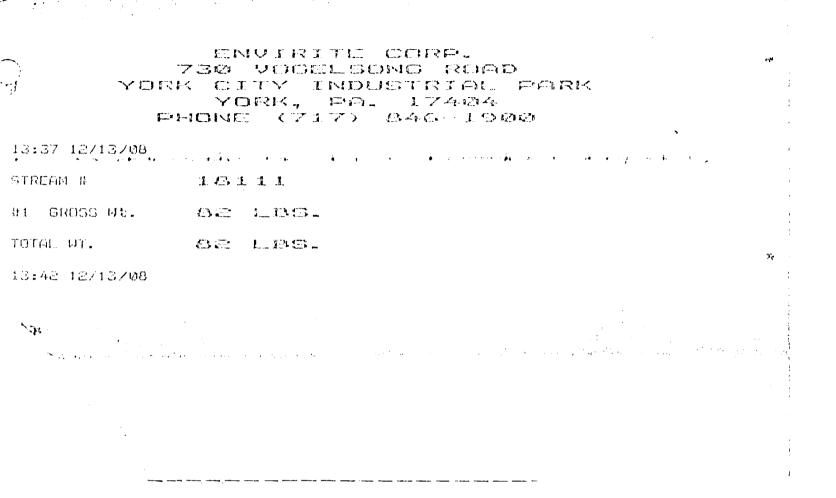
#1 GROSS Wt. 666 LESS.

TOTAL VI. C.G.C. LDS.

13:37 12/13/08

4

n an the second state of the second second



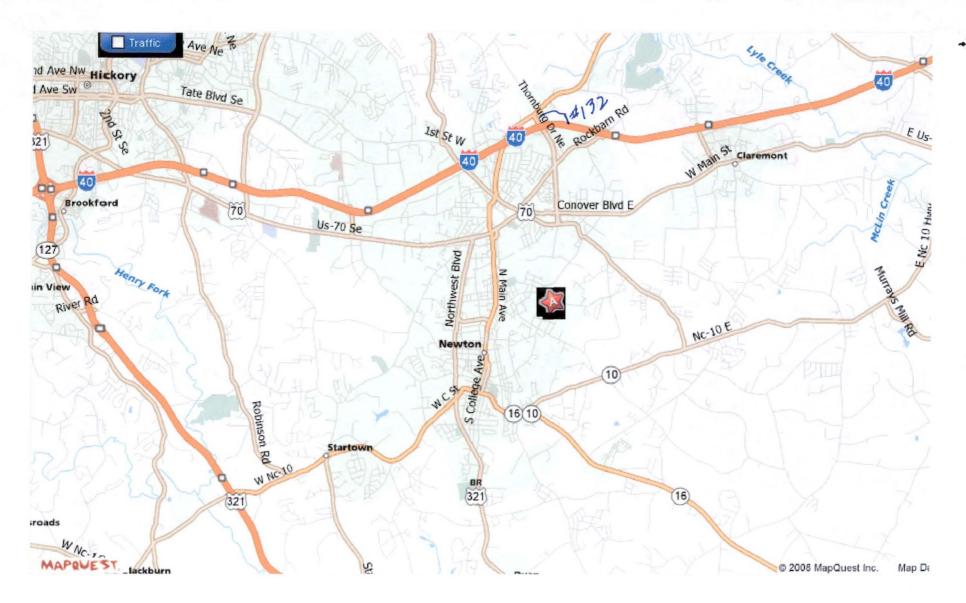
		ب ج			<b>`</b>		ī	750	75	D	<u> </u>	+	
Plea	e pr	int or type. (Form desig	ned for use on elite	(12-pitch) typewriter.)	<i>x</i>			<b>`</b>			Approved.	OMB No.	2050-0039
K	N	FORM HAZARDOUS	11	ber CD980841951	2. Page 1 of 1	82	rgency Response E8 - 465 or's Site Address (	-035		1158	<sup>umber</sup> 8672	19 F	E
	} ≀ 	enerator's Name and Mailin Special Motor 1401 Burris R	z Welding P load	roducts		Generat	ors Sile Address (	n diletent u	an maning addres	5)			
П	Gene	Newlon, NC 2 erator's Phone: 828-	8658 405-0352			i i		_			_		
	6. Tr	ansporter 1 Company Nan	ne		·····				U.S. EPAID N		54045		
		Envirite of Per ansporter 2 Company Nan	•	<u>nc.</u>	·				U.S. EPAID N				
				1.				_					
	8. De	Envirile of Per		U.S. EPA ID N	lumber			Ŷ					
	Facil	730 Vogelsor York, PA 1740 lity's Phone: 800-80	ng Road 14	т. т	•				PAE	0101	54045		•
	9a.			hipping Name, Hazard Class	s, ID Number,		10. Contain	· · · ·	11. Total	12. Unit	13. Waste Codes		
	НМ	and Packing Group (if	any)) 				No.	Туре	Quantity	Wt./Vol.			1
GENERATOR	x	Ethanol) 3.1	JN1893, PG1	•			-1	อดไ	050	P	D001	D035	
ENE N		2RIQ, HAZ	ROAS	s whate	$\mathcal{L}(\mathcal{R} \cup \overline{\mathcal{U}} \mathcal{D})$	ids.					Dr.05	2	
ĬĬ	IX			I CPOUS,			0017	DM.	6163	P			•
-	F	3.R.R.HA	ZAROC	JUS WAST	E SOLTO,				<u> </u>		0:05	i	
	lχ	NiOis, 9,	, NAZOMI	, PETT, CA	12005)		206	DIM	3088	9	0.02		
		ARIQ. HA	ZARDOU	SWASTES	SOLTONO	15,		<u> </u>			205		<u>.</u>
	Iχ	9:NARD	-	TT, CÜDOS			002	DAA	1198	P	1005		
	14.	Special Handling Instructio			/	<u> </u>				15	010	<u>}</u>	1
	ļ	K EW Approva	# 14922 File	mation Ref. # YS4367	ERG 128 3.	)EN	レロリンろうろ	(056)	510/51	/ В	ox#		
	c	DENTO	156 (0)	STALERY	<u>/// //E</u>	NI	528725	ges0	<u> 171</u>	<u>'-Di</u>	ailer # ノメア		0242
	15.	marked and labeled/place Exporter, I certify that the	arded, and are in all re- contents of this consig	<ol> <li>I hereby declare that the espects in proper condition fo gnment conform to the terms dentified in 40 CFR 262.27(a</li> </ol>	r transport according to app of the attached EPA Ackno	olicable inte wledgmer	ernational and nati at of Consent.	ional governr	nental regulations.	ipping nam If export sl	e, and are cla hipment and I	am the Prir	kaged, nary <sup>:</sup>
	Gen	erator's/Offeror's Printed/T	yped Name			ignature	62_ )	12~+			—Мо	nth Da	y Year 2.∣∂£
Ę	16.1	International Shipments	JONES	· ·			·					<u></u>	- 00
INT'L	Tra	nsporter signature (for exp	Import to Import to only):	U.S.	Export from	n U.S.	Port of en Date-leavi						
TER		Transporter Acknowledgme sporter 1 Printed/Typed Na	· · · ·			lignature	-/				Mo	nth Da	y Year
ANSPORTER		THINGS	EI /	MILER.	JR.	ngnatore	Tour	5.1	My		10	21/0	205
ANS	. 1	nsporter 2 Printed/Typed N	ame			Signature	/	- <u>19</u>	AN AN		Mc	inth Da	y Year
R		<u> </u>			~l	<u> </u>							
1		Discrepancy . Discrepancy Indication Sp	pace Quanti				Residue		Partial Rej	ection			viection —
		75 4	7555	<u>9</u>			Residue			664011			jecuon
≿	185	<u>LY19</u> - <sup>2</sup> Alternate Facility (or Gene	・フェー erator)			N	Manifest Reference	e Number:	U.S. EPA ID I	Number		·	
GNATED FACILITY			- •										
DFA	Fac	ility's Phone:											
ATE	180.	. Signature of Alternate Fai	cility (or Generator)								M I	onth Di	ay Year İ
19	19.	Hazardous Waste Report I	Management Method (	Codes (i.e., codes for hazard	ous waste treatment, dispo	sal, and re	cycling systems)						
, , 1 1	i (1,	H141	,	2	3	. /	4111		4.	HII,	1		
		Designated Facility Owner hted/Typed Name	or Operator: Certificat	tion of receipt of hazardous r		anifest exc Signature	ept as noted in Iter	m 18jar				onth Da	y Year
			e II	New Je - A	1	orginalure		(~	7/200		M	07102	
EP	A For	m 8700-22 (Rev. 3-05)	Previous editions a	are obsolete.	l		11		DES		D FACILII		·
	.·						11						

### **RCRA Site Detail**

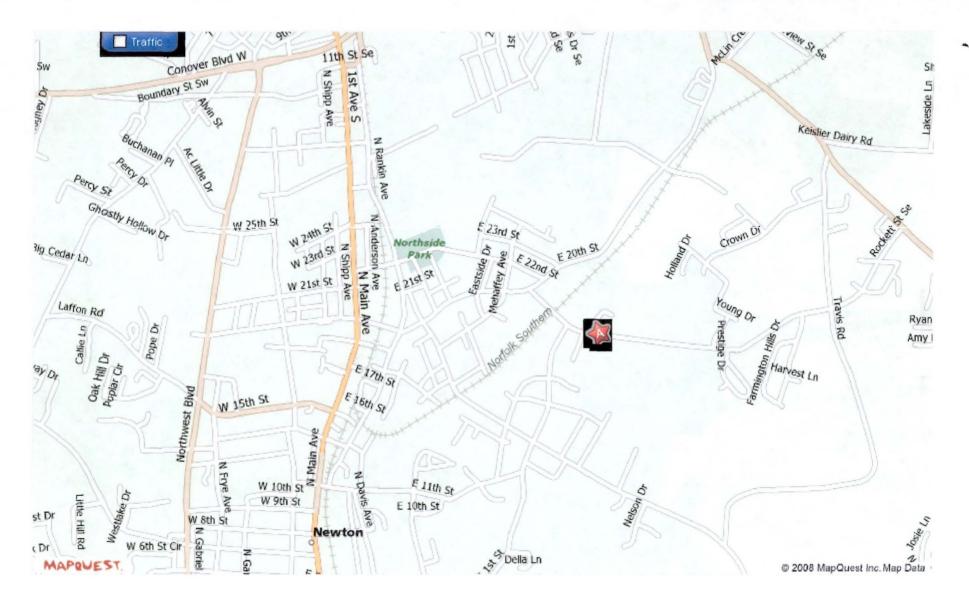
.

Report run on: May 6, 2009 - 7:40 AM

NCD980841	951	SPEC	;IAL	METAL	s Wi	ELDI	NG PR	0	DUCTS	;					
EPA Region:04	Extra	ct Flag:	Y	Facility Ide	entifie	er; C	ounty: C	AT	AWBA						
Universes			Gene	erator:	LQG	3	Transpo	orte	r: N	Activ	e:	Y			
			Oper	ating TSDF:		=	IC In Pla	ace	: N	El In	dicator	(HE / GW): N	/ N		
Activity Location:	NC	Source	Type:	Notificatio	n	Seq. N	lumber:	3		Receive	Date:	31 MAR 200	8		
Other/Previous Site	Name:	SPECIAL	META	LS WELDING	3 PRO	DUCTS		_							
		IS ROAD IC 28658							Mailing Address:	1401 BU NEWTO UNITED	N, NC	28658			
Contact Person For Source Information	82	AN E. JO 8-465-035 JONES@S	52 ext.		NE		RIS ROAD NC 28658 ATES			<u> </u>					
<b>Owner (current)</b> HUNTINGTON ALL( From: 11/26/2003	DYS To:				HU		RSIDE DI ON, WV : 'ON					Type: Phone:	Priva	te	
Operator (current) SPECIAL METALS From: 11/26/2003	WELDI To:	NG PROD	UCTS		NE		RIS ROAD NC 28658		754			Type: Phone:	Priva	te	
Latitude/Longitude M	Measur	e - Owne	r:	Seq #:									_		
Coordinates: ,															
Land Type: Priva	ite				No				rcial Availat	oility: Unk	nown			Tsd Date:	
Accessibility: NAICS Codes: 3	31491			mployees: etal (except C			State								
Regulated Waste A Hazardous Waste G			Fede	eral: Large Q	uantity	Genera	tor; State	9: N	IC-4 NC-5	STATE RE	GULA	TED			
Other Hazardous W	aste G	enerator A	ctivitie	s		Used	I Oli Acti	viti	es						
Importer Activity					lo	Use	d Oil Tra	nsp	orter Activi	ty	Off-	Specification I	Jsed C	il Burner:	No
Mixed Waste Ge	nerato	r			lo	- Transporter:					No Used Oil Fuel Marketer Activity				
Transporter Activity: TSD Activity: Recycler Activity:				1	lo lo lo	Transfer Used Oil Pro Re-refiner Ad			sor and/or	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:		shipment I oil to		
Exempt Boller and/c	or Indus	trial Furna					Processor:			No		•			No
Small Quantity (				n: N	10	Refiner:				No		Marketer who first claims the used oil meets the specifications:			No
Smelting, meltin Exemption:	g, rtein	ning ruma	١	10	Underground Injection Contro				Destination Facility for No Universal Waste:		No				
Description of Haza EPA Waste Codes:		Vastes (as	repor	ted on Site Id	entifica	ation For	m)								
Activity Location	: NC	Source	Type:	Biennial R	eport	Seq. I	Number:	8		Receive	Date:	28 MAR 200	)8	Report Cycle	: 2007
Other/Previous Site	Name:	SPECIAL	META	LS WELDIN	G PRC	DUCTS									
		IS ROAD NC 28658-	1754						Mailing Address:	1401 BU NEWTO UNITED	N, NC	28658-1754			
Contact Person For Source Information	(8	LAN E. JC 28) 465-0 JONES@S	352 ex		UN	IITED S	TATES	-							
Owner (current) HUNTINGTON ALL From: 11/26/2003	OYS To:				HU		RSIDE D TON, WV TON					Type: Phone:		te	
Operator (current) SPECIAL METALS From: 11/26/2003			OUCTS	;								Type: Phone:		te	

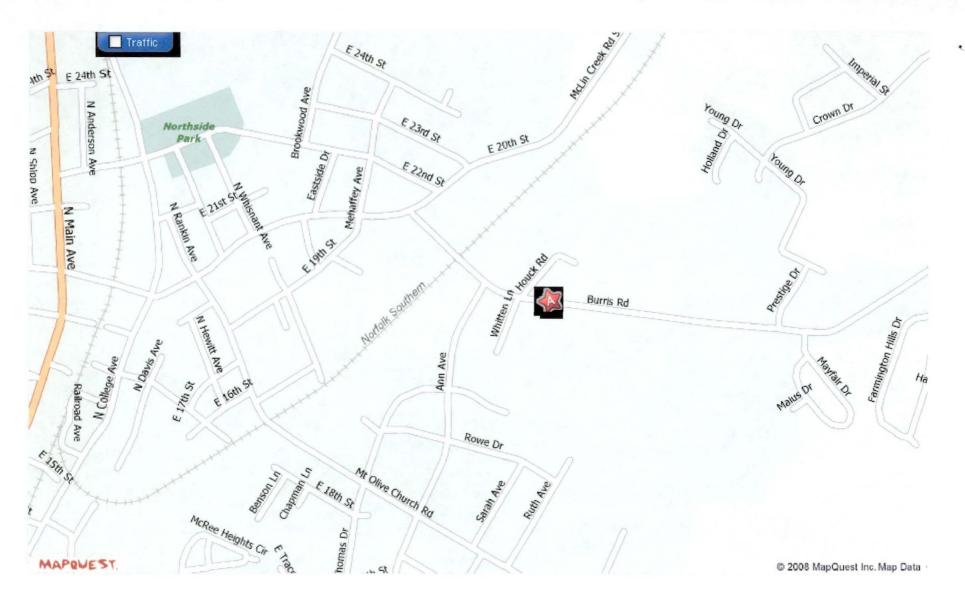


Directions and maps are informational only. We make no warranties on the accuracy of their content, road conditions or route usability or expeditiousness. You assume all risk of use. MapQuest and its suppliers shall not be liable to you for any loss or delay resulting from your use of MapQuest. Your use of MapQuest means you agree to our Terms of Use



Directions and maps are informational only. We make no warranties on the accuracy of their content, road conditions or route usability or expeditiousness. You assume all risk of use. MapQuest and its suppliers shall not be liable to you for any loss or delay resulting from your use of MapQuest. Your use of MapQuest means you agree to our <u>Terms of Use</u>

#### Map of 1401 Burris Rd Newton, NC by MapQuest



Directions and maps are informational only. We make no warranties on the accuracy of their content, road conditions or route usability or expeditiousness. You assume all risk of use. MapQuest and its suppliers shall not be liable to you for any loss or delay resulting from your use of MapQuest. Your use of MapQuest means you agree to our Terms of Use



Parcel Report - Catawba County, NC	Parcel	Report	-	Catawba	County, NC	
------------------------------------	--------	--------	---	---------	------------	--

Parcel Information:	Owner Information:
Parcel ID: 374008797592	Name: HUNTINGTON ALLOYS CORPORATION
Parcel Address: 1401 BURRIS RD	Name2:
City: NEWTON 28658	Address: 3200 RIVERSIDE DR
LRK(REID): 33851	Address2:
Deed Book/Page: CO56/0815 Deed Image	City: HUNTGINTON
Subdivision:	State/Zip: WV 25705-1737
Lots:	
Block:	
Last Sale: \$123,500 on 5/1/1984	
Plat Book/Page: 19/153	School Information:
Calculated Acreage: 14.45	School District: NEWTON CONOVER
Tax Map: 059N 02015F	Elementary School: THORNTON
State Road: 1746	Middle School: NEWTON CONOVER
Township: NEWTON	High School: <u>NEWTON CONOVER</u>
Tax/Value Information: Tax Rates(pdf)	Zoning Information:
Municipal Tax District: NEWTON	Zoning District: NEWTON
Fire District:	Zoning1: M-1
Tax Account Number: 179062	Zoning2:
Market Building(s) Value: \$1,251,300	Zoning3:
Market Land Value: \$309,800	Zoning Overlay:
Market Total Value: \$1,561,100	Small Area:
Year Built/Remodeled: 1984	Split Zoning District 1/2: 0/0
Current Tax Bill	Zoning Agency Phone Numbers
Miscellaneous:	
Voter Precinct: P22	Firm Panel Date: 9/5/2007
Building Code: COMMERCIAL or INDUSTRI	AL Firm Panel #:
Building Permits for this parcel	2010 Census Tract: 011300
WaterShed:	2010 Census Block: 2005
WaterShed Split:	
Haceronica opiner	

FAQ's

Webmaster

DISCLATMER: This map/report product was prepared from the Catawba County, NC Geospatial Information Services. Catawba County has made substantial efforts to ensure the accuracy of location and labeling information contained on this map or data on this report. Catawba County promotes and recommends the independent verification of any data contained on this map/report product by the user. The County of Catawba, its employees, agents, and personnel, disclaim, and shall not be held liable for any and all damages, loss or liability, whether direct, indirect or consequential which arises or may arise from this map/report product or the use thereof by any person or entity.

Disclaimer • Privacy/Security Notice

http://www.gis.catawba.nc.us/website/Parcel/parcel\_main.asp?Cmd=visible&lyr1=false&l... 4/15/2008

# Hazardous Waste Compliance Data Entry Form

EPA ID Number: NCD 980-841-951
Facility Name: Spours Metal Welling Products
Street: 1401 BURNIS ROAD
City: Newton NC ZIP: 28658-1754 County: Catawba
Contact Name: Alan Tones Phone#: 828-465-0352
EVALUATION DATA New: Change: Delete:
Date: $51712008$ Evaluation Type: $CSE$
Date:         / //         Evaluation Type:
Inspector ID #: $031$
Evaluation Comments: Follow up Ing Doctor
Evaluation Comments: Follow up Inz Jothon In Compshirmed
b

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (check one):

a SNC (SNY evaluation)

Docket # MA

or

no longer a SNC (SNN evaluation)

YES/NO CSE ONLY

Waste	Volume	Exposure Media	Distance to	Number of	Distance to	<b>Distance to</b>
Involved		(a, gw, sw, s)	Residences	People involved	On-site wells	Off-site wells
Doos BARUNA	78.000° 14R.		500 yds.	75	NONCE	NA

Date Determined: 4 116 12008
Branch: $\underline{\partial}$ / Person: $\underline{\partial}$ $\underline{3}$ /
Return to Compliance: <u>5127108</u> <u>5127108</u> Scheduled Actual
Regulation Description: <u>40 CFR 265.37</u>
Comment: Arrangemonts with Local officials



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

# DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

# FACILITY INSPECTION REPORT

May 27, 2008

- 1. <u>Facility Information</u>: Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 NCD 980 841 951, Large Quantity Generator
- 2. Facility Contact: Alan Jones, Plant Engineer
- 3. Survey Participants: Stephen Barron
- 4. Date of Re-Inspection: May 27, 2008
- 5. <u>Purpose of Inspection</u>: To determine compliance with deficiencies noted during the Compliance Assistance Inspection conducted on April 16, 2008.
- 6. <u>Report:</u>

On May 23, 2008 I received the compliance certification from Alan Jones, Special Metals Welding Products. The certification addressed the violation noted during the compliance assistance inspection conducted on April 16, 2008. Based on the certification, the noted violation has been corrected and the facility is in compliance with NC Hazardous Waste Regulations

7. Prior Site Deficiencies :

1) 40 CFR 265.37 Arrangements with local authorities.

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

The facility's compliance certification contained copies of the certified mail receipts showing their Integrated Contingency Plan has been given to the local emergency agencies.

Stephen H. Barron

Environmental Senior Specialist

cc: Facility MRO Files Brent Burch, Western Area Compliance Supervisor Central Office Files

Subject: "Green Cards" for Special Metals Welding Products contingency plan mailings From: "Alan Jones" <a jones@smwpc.com> Date: Fri, 23 May 2008 15:51:31 -0400 To: <Steve.Barron@ncmail.net>

#### Steve,

4

•

Please find attached the scanned copies of the Certified Mail Receipts for the mailing of our Integrated Contingency Plan, as required by 40 CFR 265.37. You will be receiving a copy of the Plan in the mail, also.

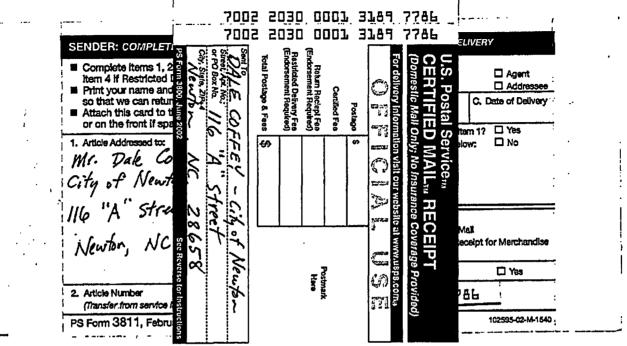
Please let me know that everything is in order with our Plan, and with the communications with the police, emergency, and hospital, etc.

Thanks, Alan Jones Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754

828-465-0352 ext 211

	<b>Content-Description:</b>	20080523154351667.pdf
20080523154351667.pdf	<b>Content-Type:</b>	application/pdf
	<b>Content-Encoding:</b>	base64



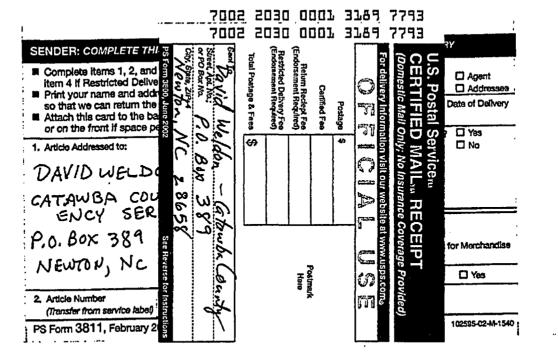




MR. DALE COFFEY City of Newton Fire Marshall 116 "A" STREET NEWTON NC 2,8658 INCONEL®, MONEL®, NHROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®

e Maril Meter and a second and a second s

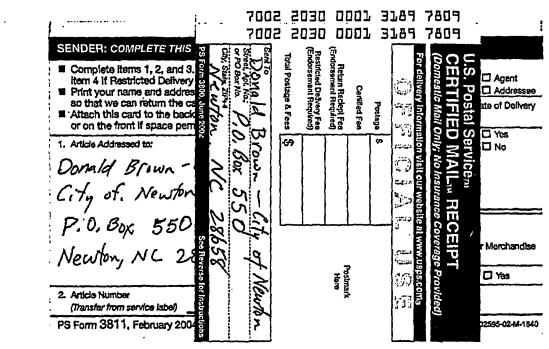






MR. DAVID WELDON CATAWBA COUNTY EMERGENCY SVCS. P.O. BOX 389 NEWTON, NC 28658 INCONEL®, MONEL®, NEROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®



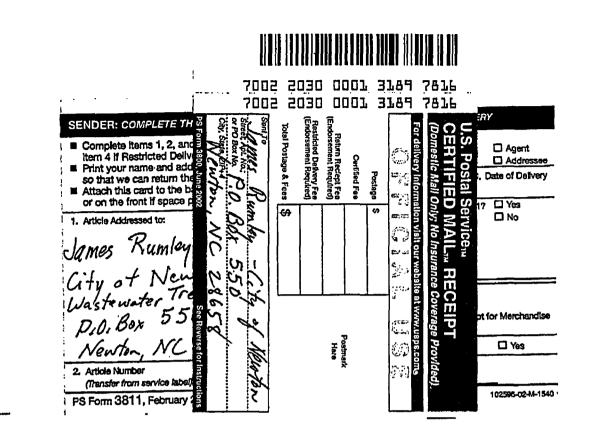




MR. DONALD BROWN City of Newton Police Department P.D. Box 550 Newton, NC 28658

INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®

and search and the second





Mr. James Rumley City of Newton Wastewater Treatmost Plant P.D. Box 550 Newton, NC, 28658 INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®



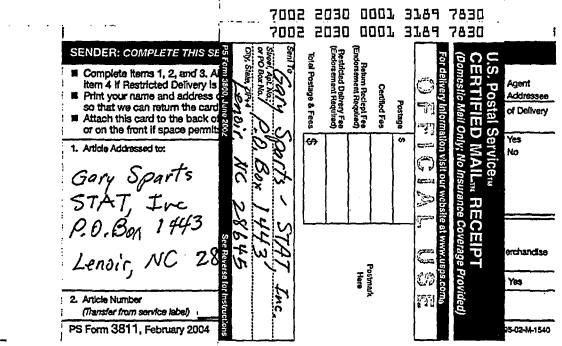
SENDER: COMPLETE THIS SECTIO	2 P 2	6en	a Edg	(End			7	30 <i>6</i>
<ul> <li>Complete items 1, 2, and 3. Also co item 4 if Restricted Delivery is desire</li> <li>Print your name and address on the so that we can return the card to yo f</li> <li>Attach this card to the back of the m or on the front if space permits.</li> </ul>	Sing Zria	the Dale	testricted Daïwery Fee Indorcement Required) Total Postage & Fees	Return Reciept Fae torsement Required)	Centhed Faa	Postaga	r delivery informs	si s S. Postal S ERTIFIED Iomestic Mall O
1. Article Addressed to:	Failar	Greer	\$			ŝ	llon visit our v	bervicera MAILTH MAILTH
Dale Greer Caturba Memorial Hos 810 Fairgrove Church Hickory, NC 2860	ive Ch	- Caton					Websile at www	II RECEII
Hickory, NC 2860	urch Ro	bs Meno		Postmark Here	3		Windersons	ST Sge Provided



Welding Products Company 1401 Burris Rd., Newton, North Carolina 28658 Welding Electrodes • Filler Metals • Flux-Cored Wires • Fluxes

Mr. Dale Greer Catawba Memorial Hospital 810 Fairgrove Church Road Hickory, NC 28602-INCONEL®, MONEL®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®





÷

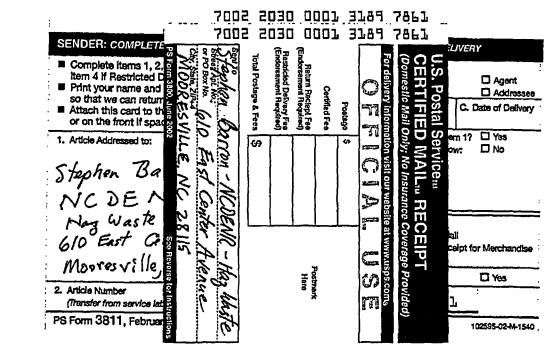


Welding Products Company 1401 Burris Rd., Newton, North Carolina 28658 Welding Electrodes • Filler Metals • Flux-Corod Wires • Fluxes

Mr. Gary Sparts STAT, Inc. P.O. Box 1443 Lenoir, NC 28645

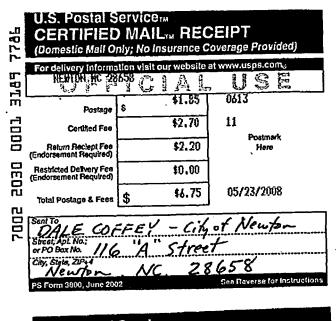
INCONEL®, MONEL®, NI-ROD®, INCOLOY®, NIMONIC®, INCO-WELD®, INCOFLUX®, NILO®

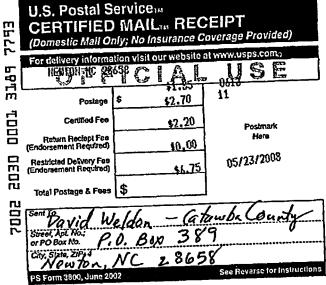


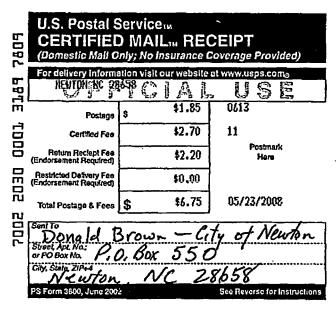




Mr. Stephen Barron NCDENR - Nag Waste Section 610 East Center Avenue Mooresville, NC 28115 INCONEL, MONEL, NI-ROD, INCOLOY, NIMONIC, INCO-WELD, INCOFLUX, NILO







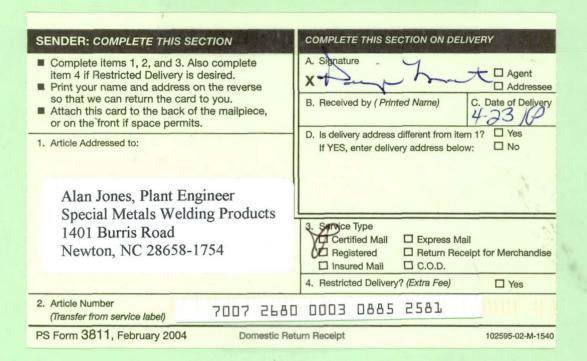
U.S. Postal	D MAIL RECE	
	nly; No Insurance Co	
	ation visit our websile at 1 658 7 1 2 6	1 7 63 773
	<u> e kar it i i i i i i i i i i i i i i i i i i</u>	0613
Postage	s \$1.85	0010
Certified Fee	\$2.70	11
<ul> <li>Return Reciept Fee (Endorsement Required)</li> </ul>	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
TU Total Postaga & Fees	\$ \$6.75	05/23/2002
Sont To		CYL I
Street, Apt. No.	umby - City	of NEWTON
or PO Box No.	Box 550	
Newton	,NC 286.	58
PS Form 3800, June 200	2 S	ee Reverse for Instructions
•		
U.S. Postal S		
R CERTIFIEI	D MAILTA RECE	rerage Provided)
(Domestic Mail C	iniy; No insurance eet	WWW USDS COM :
East delivery inform	ation visit our website at	USE
	1.85	8613
Postage	\$	
Certified Fee	\$2.70	11
Certified Fee	\$2.20	Postmark Here
(Eugoisement Hadratan)		
Restricted Delivery Fee	\$0.00	
Total Postage & Fee	\$ \$6.75	05/23/2008
N		1 Mar il
Sent To Jale	Greer - Cal	uba Memorial
Street, Apt. No.: 8/1	) Fairarive (	Church Road
City, State, ZIP+4	NC 2860	22
PS Form 3800, Jure 2		See Reverse for instructions
ILS Post	al Service <sub>TM</sub>	
		CEIPT
Domestic Ma	il Only; No Insurance	
For delivery infe	ormation visit our website	
	23645 PIA 1	USE
n n	\$1.85	0613
Post	age S	
Certified	Fee \$2.70	11
CI Return Reciept (Endorsement Requi	Fee \$2.20	Postmark Hero
Bastdated Defines	Fee In m	ţ
CEndorsement Regul	(ea)	05/23/2008
Total Postage & F	ees \$ \$6.75	0.07 201 2008
Sent To Safu	Souch -	STAT. Inc.
Street Apl Na;	000	-1/1, +nc.
or PO Box No./ City, Slate, ZIP+4	P.O. Box 1	773
Len		8645
PS Form 3900, June	2002	See Reverse for Instructions

189 7861		D MAIL IN RE	Coverage Provided) at www.usps.com <sub>3</sub>
m	Postage	s \$1.85	0613
1000	Certified Fee	\$2.70	11
	Return Reciept Fee (Endorsement Required)	\$2.20	Postmark Hers
2030	Restricted Delivery Fee (Endorsement Required)	\$9.00	
n	Total Postage & Fees	\$ \$6.75	05/23/2008
002	Sentro Steephon bo Steep Apt. No: or PO Box No. 6/0. City, Sinta 2004 MOORES VII PS Form 3500, Unite 2002	East Center East Center LE, NC 28	VR - Haz hlaste r. <u>Avenue</u> 115

.

•

-



581		DN Dnly;	No Insurance (	Coverage Provided)
л Л	NECON PE P	658	CIAL	at www.usps.com <sub>®</sub>
0 8 8	Postage	\$	\$0.97	0028
m	Certified Fee		\$2.65	05
EOOO	Return Receipt Fee (Endorsement Required)		\$2.15	Postmark Here
	Restricted Delivery Fee (Endorsement Required)		\$0.00	
268	Total Postage & Fees	\$	\$5.77	04/22/2008
2002	Sent To Street, Apt. No.; or PO Box No. City, State, ZIP+4			
	PS Form 3800, August 20	06		See Reverse for Instructions

۱						
	Hazaro	lous Waste Co	mpliance ]	<u>Data Entry Fo</u>	orm – Side A	
EPA ID Numb	er: <u>NCT</u>	980-841-	-951	,	,	1
Facility Name	Spirate	1 Mittaks Wa	ELDINY PR	Paloct Zity: 1	Venton /	Catmobra
EVALUATIO		New:	Change:	Delete:		
Date: Date:	40112	<u>18</u>	Evaluation Evaluation	Гуре: <u>СЕ</u> Туре:		
Inspect	tor ID #: 031	-	Reason:			
Evaluation Co	omments:	Tidet	Nov/	Dockot	2008	5-079
	are SNY/SNI	f this evaluation res N evaluations. The S a SNC (SNY ev no longer a SN	SNY/SNN ev	aluation can also b		on a separate
YES / NO ( Waste Involved	CSE ONLY Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells
Date Determine	ed: 041	16 12008				
Branch: O/	/	erson: 03 /				
Return to Com		Scheduled	2	// Actual		
Regulation Des	scription:	10 CFR 24	5.37			
Comment:	FAihono	- TO mpko	Pillanta	monts with	Lorne Aut	honitions
Date Determine	ed:/_	/			******	
Branch:	_ P	erson:				
Return to Comj	pliance:		_//_		///	
Regulation Des	scription:					
Comment:						

٩,



# North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

٩

William G. Ross Jr., Secretary

# DIVISION OF WASTE MANAGEMENT HAZARDOUS WASTE SECTION

# FACILITY INSPECTION REPORT

April 21, 2008

- 1. <u>Facility Information</u>: Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754 NCD 980 841 951, Large Quantity Generator
- 2. Facility Contact: Alan Jones, Plant Engineer
- 3. <u>Survey Participants</u>: Alan Jones, Stephen Barron
- 4. Date of Inspection: April 16, 2008
- 5. <u>Purpose of Inspection</u>: To determine compliance with 40 CFR 260-279

# 6. Facility Description:

- The facility manufactures welding rods and products.
- The facility was inspected as a Large Quantity Generator.
- The main waste is D005 Barium solid and liquid wastes. The 2007 Biennial Report indicated shipments of approximately 78,000 pounds of this waste annually.
- There are approximately 75 employees at this facility.
- The nearest private residence is approximately 500 yards from the facility.
- The facility is on city water and sewer. They have a NPDES permit.
- The facility consists of one manufacturing building.

# 7. Waste Type:

- D005 Barium solid and liquid waste is the major waste stream.
- They ship in 55 gal drum containers and occasional metal roll off containers.

# 8. Areas of Inspection:

<u>Manifests</u>

•

- Manifests where inspected and found to be correct.
  - Signed delivery copy included.
  - Land Disposal Restrictions included.
  - Manifest completed correctly.
  - Drummed hazardous waste shipments are made approximately monthly. Metal roll offs are shipped annually.
- o Transporter: Envirite of Ohio OHD 980 568 992
- o TSD: Envirite of Ohio OHD 980 568 992
- Weekly Inspections
  - Weekly inspections documents were reviewed.
  - o Inspections are being performed and documented correctly.
- <u>Training</u>
  - Facility personnel are completing classroom training on the subject of hazardous waste procedures.
  - Three employee job descriptions are documented correctly for the employees handling hazardous waste.
  - Annual training of these employees is taking place. Last training date was 10MAY07.
- Emergency Preparedness
  - The facility has system for notification of employees in the case of a fire or emergency.
  - Emergency coordinators are assigned, trained. Correct address information was documented.
  - o Emergency equipment is mapped and maintained.
  - o There has not been a major emergency at this facility.
  - The facility has only limited internal emergency response capabilities, and relies heavily on outside emergency response agencies.
  - ADT completes monthly fire sprinkler inspections.
  - o Fire extinguishers are checked monthly.
  - Key employees carry radios.

- <u>Contingency Plan</u>
  - The facility has not completed and documented arrangements with local emergency facilities.
  - o Their Contingency Plan was located on site.
  - o All emergency coordinator information was listed and was correct.
  - All emergency equipment is indicated in the plan.
  - Evacuation routes were included.
- Biennial Report
  - o The facility's last Biennial Report was submitted on 28MAR08
  - o The annual RCRA fees were paid on 13AUG07.
- Waste Minimization Plan
  - o The Waste Minimization plan was located on site and was reviewed.
- <u>Accumulation Areas</u>
  - There were 6 satellite accumulation areas at the facility.
  - o The satellite accumulation area consisted one closed head 55 gal. container.
  - o Containers were labeled correctly.
  - o Containers were closed.
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - o It held 7 containers of D005 waste.
  - The containers were properly labeled and dated.
  - There was proper aisle spacing.
  - No leaks or spills were present.
  - There is also one 8' x 10' x 8' deep in-ground FLUX PIT located on the west side of the building the collects water from the manufacturing machines. This water contains D005 Barium waste solids. The water is drained to the city POTW. The waste solids are removed annually by use of a vacuum truck and closed roll off container. The facility utilizes Shamrock vacuum truck.
- Universal Waste/ Used Oil
  - The facility utilizes GE green fluorescent tube lamps which MSDSs indicated are non-hazardous.
  - This facility has Used Oil stored on the Rear Pad. Storage is in 55 gal. containers. The containers were properly labeled. No leaks or spills were present. Used Oil is recycled.
  - 610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115 Phone: 704-663-1699 \ FAX: 704-663-6040

- <u>Subpart BB/CC/J</u>
  - o None at this facility

#### 9. Site Deficiencies & Required Actions:

# 1) 40 CFR 265.37 Arrangements with local authorities.

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

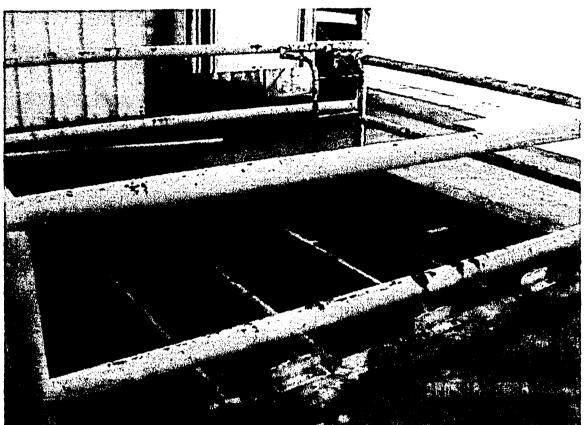
(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

Special Metals Welding Products is in violation of this regulation in arrangements with local emergency authorities have not made or documented.

Special Metals Welding Products must make and document arrangements for services with emergency authorities and contractors.

# 10. Comments/Recommendations:

Digital photos were taken during the inspection. •



o

FLUX PIT D0Q5 Waste Solids/ Water to POTW Di Azil 08 Date Stephen H. Barron

Environmental Senior Specialist

cc: Facility MRO Files Brent Burch, Western Area Compliance Supervisor **Central Office Files** 



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

# Division of Waste Management Hazardous Waste Section

April 21, 2008

# NOTICE OF VIOLATION

Alan Jones, Plant Engineer Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754

Docket #: 2008-079 Date of Inspection: April 16, 2008 Facility Type: LQG EPA ID#: NCD 980 841 951

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On April 16, 2008, Stephen Barron, Environmental Senior Specialist, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that investigation, the following violations were noted:

1) 40 CFR 265.37, adopted by reference at 15A NCAC 13A .0102, states that a facility must make arrangements with local authorities:

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.

Special Metals Welding Products is in violation of this regulation in arrangements with local emergency authorities have not made or documented.

#### **Required Actions**

Special Metals Welding Products must make and document arrangements for services with emergency authorities and contractors.

You are hereby required to comply with the noted violation by May 30, 2008 at which time a follow up visit may be performed. If compliance with the violations noted above are not met, pursuant to N.C.G.S. 130A-22 (a) and 15A NCAC 13A .0701-.0707, an administrative penalty of up to \$32,500.00 per day may be assessed for violation of the hazardous waste law or regulations.

In further satisfaction of Docket #2008-079, Special Metals Welding Products shall provide a written certification with supporting documentation on company letterhead confirming that the noted compliance schedule has been completed. Mail this certification to Mr. Steve Barron – Environmental Senior Specialist at NCDENR-Division of Waste Management, Hazardous Waste Section, 610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115.

21 Ap

N.C. Hazardous Waste Section

I, Stephen H. Barron, hereby certify that I have personally served a copy of this Notice on: Alan Jones, Special Metals Welding Products by certified mail.

SENT CERTIFIED MAIL (Recipient Signature Required)

cc: Mr. Brent Burch, NC Hazardous Waste Section Central Files MRO files G Cki ....

LQG CkListSB3 4FEB08 Time Arrived 930 mm
RCRA INSPECTION REPORT - LQG Inspection Date 16 April
Facility Name: Special Melals Welding Products
Mailing Address: 1401 Branus R.C. Newston 28658
EPA ID#: NCD 980-841-951 Phone Number: 828-465-035
Contact/Title: Alan JONES. X211
Last Inspection: A Status: La C. Type of Inspection: Can
Present at Inspection:
Check Manifest to determine the category of generator
CESQG < 220# (1/2 drum) month, 2,200# Max (5 ½ drums)
SQG >220# (1/2 drum) month <2200 # (5 ½ drums) Max 13,200# (33 drums)
(LQG >2200# (5 ½ drums) month
Facility Description/Processes/# Employees: 10 March 200
Number of Building (1) Mg Welding Rode. Mrs /116-
Wastes Generated Dors Barium
Nearest Residence 500 Jul. POTW or Sewer City Water
1- MANIFESTS: Transporters: (Names & EPA ID) BNURTE OF OHO OHD 980 565 992
TSDs (Names & EPA ID) BNVIRITE & OHD 980-568-992
<ul> <li>Signed Copies?</li></ul>
1
4.77.

Q21. 1262 p Soli Doo 5 Dorum 55.95 4654 P. 65 5415 P Lyand Doo5 DAnus. - TANKer Upiversia Waste & Forthe Container Door Do35 Now waste Stem 2007 Billeron A 3005 78.188# 

#### LDR CERTIFICATION 268.7 (a) (4)

Land Disposal Restrictions must accompany all waste streams sent to TSDF. Land bans forms attached (one time notifications if waste stream does not change)

APPROVED TSD'S AND TRANSPORTERS 262.12 (c)

Generators must use approved TSD's and Transporters with valid EPA ID numbers.

#### 2- WASTE MINIMIZATION PLAN ON-SITE

- a) LQG must submit Waste Minimization Questionnaire with annual fees.
- b) Must sign off certification on manifests (reduced waste as economically practical).

# 3 - RECORDKEEPING 262.40

- a) Mainfest must be kept for three years -7
- b) Biennial Reports must be kept for three years. Submitted?
- c) Waste analyses or test results must be kept for three years
- d) If enforcement actions are taken these time periods are extended.

# 4 - INSPECTIONS-265.174

Must complete weekly inspections of containers in storage. Looking for leaks or corrosion.

# Weekly Inspection Records: Storage Area 1: Waste Rear PAd. Storage Area 2: Acc Storage Area 3: Area

# 5 - ARRANGEMENTS WITH LOCAL AUTHORITIES-265.37

(A) Arrangement for services should be made with the following:

- 1) Arrangements to familiarize emergency authorities with the facility layout and properties of hazardous waste handled and entrance and evacuation roads.
- 2) Primary response agencies should be established with all emergency responders. All others will support.
- 3) Arrangements with state emergency response teams, contractors, and equipment suppliers.
- 4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled.
- (B) Documentation from any local authorities that decline any of the emergency arrangements

\*COMPLIANCE YES/NO

**\*COMPLIANCE YES/NO** 

\*COMPLIANCE/ YES/N

\*COMPLIANCE YES/NO

\*COMPLIANCE/YES/NO

\*COMPLIANCE YES/NO

# 6 - CONTINGENCY PLAN-265.51

\*COMPLIANCE YES/NC

- a) Each owner or operator must have a contingency plan for their facility.
- b) Plan must be carried out in the event of a fire, explosion, or release of hazardous waste that could threaten health or environment.

CONTENTS OF CONTINGENCY PLAN 265.52

\*COMPLIANCE YES/NO

\*COMPLIANCE YES/NO

\*COMPLIANCE YES/NO

- a) Plan must describe the actions personnel must take to respond to event.
- b) SPCC plan can be amended to include required content in this subpart.
- c) Plan must describe arrangements agreed to by local police, fire, hospitals, contractors, and state agencies.
- d) The plan must list names, addresses, and phone numbers (home and office) for all emergency
- coordinators. List must be kept up to date. Primary coordinator and secondary coordinators should be listed.
- e) Plan must include a list of all emergency equipment and alarms at the facility. List should show locations and physical descriptions of equipment. List must remain up to date.
- f) The plan must include an evacuation plan if evacuation may be required. The plan should describe signals, evacuation routes, and alternate evacuation routes.
- COPIES OF THE CONTINGENCY PLAN 265.53
- a) Contingency plans and revisions must be:
- b) Maintained at the facility.

c) Submitted to all local police, fire, hospitals, state agencies, and emergency response teams.

AMENDMENT OF CONTINGENCY PLAN 265.54

Plan must be amended when content of plan changes.

# Contingency Plan:

#### On-Site ?

Any changes to facility / processes or Emergency Coordinator since last review?

Contingency Plan Implemented? (If ye	es, was it adequate?)	1 F
Description of Emergency Equip?	No major	incidents')
Addresses of Emergency Coordinator?		
Evacuation Plan?		
Emergency Procedures Described?		
A anatomata with Eastern Dans and and		1

Agreements with Emergency Responders? (documented or stated in contingency plan?)

#### 7 - PERSONNEL TRAINING-265.16

\*COMPLIANCE YES/NO

a) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way to ensure compliance with this section's requirements.

(2) Training must be conducted by a person trained in hazardous waste management procedures and training must include hazardous waste management training relevant to each employee's position (including contingency plan implementation).

- (1) Training should de designed to ensure that personnel can respond properly to emergencies.
- b) Personnel must complete the training within six months of there hire date or when they change job responsibilities.
- c) Personnel must take part in an annual review of the initial training.
- d) The following documents must be maintained at the facility:
  - (1) Job title and person filling position for each position related to hazardous waste management.
  - (2) A job description for each position listed above, including requisite skills, education, and qualifications. Position duties should also be recorded.
  - (3) A written description of the type and amount of initial and continuing training that will be given for each position.
  - (4) Records that document that the training or job experience have been completed by personnel.
- e) Training records on current personnel must be kept until closure of the facility. Training records on all former employees must be kept for at least three years from date of separation

#### Training Records/Job Description: (Emerg coord/ Handlers haz waste)

Job Description Adequate?\_\_\_\_\_\_ New Employees since Last Inspection\_\_\_\_\_\_ Training Class Adequate?\_\_\_\_\_

Employee	Responsibility	Job Title	Job Description	<b>Training Date</b>	Prev Date
Charlie Sta	41. 11 -0 1	role		5/10/07	27 April 07
	0' h	~			· · · ·
D	1.00	0	11.01		
Chris 10	ay field	" Tres	stelper.		
et la	Van.			)	
Shane IV	1 Sweeney	Icam Leaden	~		
	- d				

\*COMPLIANCE YES/NO

Spill Cart in Sh

#### 8 - EMERGENCY PROCEDURES 265.56

- a) During an emergency event the coordinator must immediately:
  - (1) Activate facility alarms or communication system to alert all personnel.
  - (2) Notify appropriate state of local agencies as needed.
- b) In the event of a fire, explosion, or release, the coordinator must identify character, exact source, amount, and extent of problem. This can be done by observation, records, or chemical analysis.
- c) Coordinator must assess all possible direct and indirect effects of the event.
- d) If the coordinator determines that a fire, explosion, or release has occurred he must report his findings as follows:
  - (1) Must notify proper authorities if evacuation is needed. Must be available to help decide what areas should be evacuated.
  - (2) Must notify government on-scene coordinator or National Response Center.
- e) Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste. These measures include stopping production, collecting or containing releases and isolating containers.
- f) If facility stops operations the coordinator must monitor for leaks, pressure buildup, gas generation, ruptures in valves, pipes, or other equipment.
- g) After an emergency the coordinator must provide for disposal for all released waste, contaminated soil or surface water, or other material.
- h) Coordinator must ensure that affected part of the facility:
  - (2) No incompatible waste with released material is stored until cleanup is complete.
  - (3) All emergency equipment is cleaned and fit for use.
- i) The owner or operator must notify government agencies before resuming operations.
- j) The owner or operator must note the time, date, and details of any incident that requires the implementing of the contingency plan. The report must be submitted to EPA or State within 15 days of the incident. \*see section for specifics to be included in report.

#### **Emergency Preparedness:**

- ADT monthly FAromoully

#### **Facility Tour**

#### 1 - STORAGE AREAS

#### MAXIMUM STORAGE TIME-262.34 (a)

90 days or less.

#### • CONTAINER DATES-262.34 (a) (2)

Containers must be dated when accumulation begins.

#### • LABELING-262.34 (a) (3)

Containers in storage area must be labeled "hazardous waste". Containers in the satellite accumulation areas must also be labeled "hazardous waste" or labeled with content description as described in 262.34 (c) (ii).

CONDITION OF CONATINERS-265.171

If container-holding waste is leaking or in poor condition the waste must be transferred to a container in good condition.

#### COMPATIBILITY OF WASTE WITH CONTAINERS-265.172 \*COMPLIANCE YES/NO\_\_\_\_\_

Container must be compatible with waste.

#### MANAGEMENT OF CONTAINERS-265.173 (storage+accum.) \*COMPLIANCE YES/NO\_\_\_\_\_

- (a) Container must be closed except when adding or removing waste
- (b) Container must not be handled or stored in a manner that will cause it to leak.
- INCOMPATIBLE WASTE-265.177
  - (a) Same containers must not be used for incompatible waste.
  - (b) Incompatible waste should not be placed in unwashed containers that held incompatible waste.

(c) A dike, berm, wall, or other device should separate incompatible waste or material.

#### • IGNITABLE OR REACTIVE WASTE-265.176

Containers holding ignitable or reactive waste must be located at least 50 feet from facility's property line

Stored in a 4 Down Phose tic Spell Bex

#### **\*COMPLIANCE YES/NO**

\*COMPLIANCE YES/NO

# \*COMPLIANCE YES/NO\_\_\_\_

\*COMPLIANCE YES/NO\_\_\_\_\_

**\*COMPLIANCE YES/NO** 

\*COMPLIANCE YES/NO

STORAGE AREAS:
Name of Area: 1 Rear Pad. Nec. Area Drums.
Number of Containers and Dates: 7 Dumes
Containers: Closed? Aisle Space? Labeled with "Hazardous Waste"
Dated? Evidence of Release? < 90 Days? Good Condition?
Type of device in area to summon outside help? Waste Compatible?
Maintenance of fire extinguish /equip(frequency/company) monthly w
Spill Control Equipment:
Storage Area(s):
Name of Area: In pound PI That hamout -
Number of Containers and Dates:
Containers: Closed? Aisle Space? Labeled with "Hazardous Waste"
Dated? Evidence of Release? < 90 Days? Good Condition?
Type of device in area to summon outside help? Fire Extinguish and/or Fire Control Equip? Waste Compatible?
Maintenance of fire extinguish /equip(frequency/company)
Spill Control Equipment:
Starrage Armo(a)
Storage Area(s):
Name of Area:
Number of Containers and Dates:
Containers: Closed? Aisle Space? Labeled with "Hazardous Waste"
Dated? Evidence of Release? < 90 Days? Good Condition?
Type of device in area to summon outside help? Fire Extinguish and/or Fire Control Equip? Waste Compatible?
Maintenance of fire extinguish /equip(frequency/company)
Spill Control Equipment:

# 2 - SATELLITE ACCUMULATION AREAS

Name/Location	Description (including at or	Closed?	<55gal	Labeled?	Releases?	
1	near)					
2/TiG	Some meto	2V	V	V	V	
1. Elchoffa	er Contitioner					
Holl ment	Afrida		$ $	1	V	
toul fi	Rt.	1/		V	2	
Flux B	ushin	V	V	V		
That	Pit. (Doos)	(Ann	and Ci	Lean out		
SATELLITE ACCUMULATION AREA-262.34 (c) (1) COMPLIANCE YES/NO						

- a) No more than 55-gallons accumulated at the satellite accumulation areas.
- b) Must be labeled Hazardous Waste or other content ID wording.
- c) At or near point of generation.
- d) Under control of operator
- e) Closed. Funnels must have closing device. Munt Shap @ 716.
- f) No spillage.

# 3 - UNIVERSAL WASTE 273

#### LCM

- a) Small Quantity Handler of Universal Waste generates less than 11,023 lbs. total universal waste.
- b) Includes LCM, batteries
- c) One year storage, need date management system
- d) Proper training of employees on handling and emergency response.
- e) Must be labeled "Universal Waste Lamps"
- f) Do not have to maintain shipping records.
- g) Can not dispose of untested lamps into landfill
- h) Must be contained and unbroken.
- i) Use recycler to pickup

#### **USED OIL 279**

- a) Must label container "USED OIL"
- b) No spills around drums.
- c) Must have a recycler pickup drums, or vacuum large tanks.

COMPLIANCE YES/NO

Nalson Oil.

**COMPLIANCE YES/NO** 

8

DMR8

Waste Steams IPA

# 4 CONTAMINATED WIPES - 261.3

COMPLIANCE YES/NO

- a) Listed waste causes wipes to be hazardous waste
- b) Characteristic wastes are only hazardous waste as long as the characteristic is still present.
- c) Laundered wipes are not considered solid waste (reused)

AS

Site Deficiencies:

#### **Recommendations:**





Applies to facilities equipment that generates waste with a greater than 10% by weight organic concentration.

265.1050 (c)- Each piece of equipment must be marked so it can be distinguished from other pieces of equipment.

#### **PUMPS:**

. .

265,1052 (a) (1) - Pumps in light liquid service must be inspected monthly with VO detection device.

265.1052 (a) (2) – Pumps in light liquid service should be checked visually each week for leaks in pump seal.

265.1052 (b) - If instrument reading is 10,000ppm or greater, a leak is detected.

265.1052 (c) – Repairs must be made within 15 days a first attempt should be made within 5 days. Delays are allowed if 265.1059 is met.

265.1052 (d) – Pumps with a dual mechanical seal that includes a barrier fluid system are exempt. Specifics apply, see section.

265.1052 (e) – Pumps designated as no detectable emissions ( <500 ppm above back ground) can be exempt from above if:

- (1) No externally actuated shaft penetrating pump housing.
- (2) Must operate as <500 ppm above background.
- (3) Must continue to test annually.

#### **COMPRESSORS:**

265.1053 – Compressors must be equipped with a seal system that includes a barrier fluid system that prevents leakage except when the compressor is in a closed vent system where leaks are directed to a control device or is operating with no detectable emissions as indicated with a reading of less than 500 ppm. These compressors must be monitored annually. If equipment is not operated as no detectable emissions then the compressor is required to have a leak sensor to detect failure of seal system, barrier fluid system.

#### **PRESSURE RELIEF DEVICES:**

265.1054 – Pressure relief devices in gas/vapor service must be operated with no detectable leaks or below 500 ppm unless leaks are captured in a control device then it is exempt.

265.1058 (a) – Pressure relief devices in light or heavy liquid service must be monitored within 5 days of detecting a leak by visual, audible, olfactory, or any other detection method.

#### SAMPLING CONNECTING SYSTEMS:

265.1055 -- Each sampling connection system shall be equipped with a closed-purge, closed loop, closed vent system. Sample purge must be returned to process or treated.

#### **OPEN-ENDED VALVES OR LINES:**

265.1056 – Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. These should always be in use.

### VALVES:

. 、

265.1057 (a) – Each valve in gas/vapor or light liquid service shall be monitored monthly for leaks using a detection instrument (LOOK AT CALIBRATION RECORDS, SHOULD BE CALIBRATED BEFORE EACH USE).

265.1057 (b) - If instrument reading is 10,000ppm or greater, a leak is detected.

265.1057 (c) – If no leak for two successive months then can monitor quarterly.

256.1057 (f) - Pumps designated as no detectable emissions ( <500 ppm above back ground) can be exempt from (a) if:

- (1) No external actuating mechanism in contact with HW.
- (2) Operated under 500 ppm
- (3) Is tested annually

265.1057 (g) (1) - States that valves that are considered unsafe to monitor do not have to be inspected monthly.

265.1057 (g) (2) – States that a written plan should be in place that requires monitoring as frequently as practicable during safe times but

265.1057 (h) (1) – Monthly inspections do not have to be conducted if the personnel must be elevated higher than 2 meters above a support surface. Defined as difficult to monitor.

265.1057 (h) (2) – Monthly inspections on difficult to monitor valves do not have to be conducted if the HWMU was in operation before 1990

265.1057 (h) (3) – A written plan must be in place that requires monitoring at least once per year for valves defined as difficult to monitor.

# Pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, flanges and connectors:

256.1058 (a) - All above must be monitored within 5 days of detecting a leak by visual, audible, olfactory, or any other method.

#### **RECORDKEEPING REQUIREMENTS:**

265.1064 (b) (1) – The facility Operating Record must include the following:

- (i) Equipment identification numbers and HWMU it is in.
- (ii) Approximate locations of equipment within the facility (plot plan).
- (iii) Type of equipment (pump, valve, etc.).
- (iv) Percent by weight of total organics at the equipment.
- (v) Hazardous waste state at the equipment (gas, liquid, etc.)
- (vi) Method of compliance with each piece of equipment standard.

265.1064 (c) - When a leak is found the equipment must be labeled with ID #, date leak was found.

265.1064 (d) - Must properly document leak information as required in this reg.

### 265.1064 (g) -

. •

(1) ) Requires ID #s for all equipment

(2) Requires ID #s for all equipment designated as no detectable emissions. The designation of the equipment must be signed by the owner operator.

- (3)List of ID #s for regulated pressure relief devices
- (4) Dates for compliance tests for no detectable emissions. The background level result. The maximum instrument reading
- (5) List of ID#s for equipment in vacuum service.
- (6) Identification by either list or location of equipment that contacts HW less than 300-hours a year.

265.1064 (h) – Must list all valves ID #s that are desugnated as difficult or unsafe to monitor.

265.1064 (i) – Must be recorded in operating record

- (1) Schedule of monitoring
- (2) Percent of valves found leaking during each monitoring period.

#### Leaks:

Pumps + Compressors: Leaks must be repaired as soon as practicable. First attempt to repair must be made within 5-days. Must be repaired by 15-days.

Valves: Must be monitored monthly until repair is made. First attempt at repair within 5-days and repaired within 15-days.

Leaking equipment must be labeled with ID #, date of evidence of leak, and date of leak detection. Label can be removed once repaired except for valves. Valves must pass two months of testing before removal.

Instrument ID#, operator ID#, equipment ID#, date of evidence of leak, date leak was detected, date of first attempt to repair, repair methods, any reason for repair delay, date of expected repair, and the date of the repair. This information must be recorded on an inspection log and maintained with operating records.

### Subpart CC:

- 1. Level 1 tank less than 20,000-gallons, vapor pressure less than 11.1 psi/76.6 kPa.
- 2. Maximum organic vapor pressure. \_\_\_\_\_. 265.1085 (c)(1)
- 3. Tank must have a fixed roof that remains free of visible cracks, holes, gaps, or other openings. .265.1085 (c)(2)(ii)
- 4. Pressure-vacuum relief device. Release pressure must be less than vapor pressure in the tank.\_\_\_\_\_265.1085 (c)(3)(ii)
- Annual inspection for visible cracks, holes, or gaps on tank roof. Damaged seals or gaskets on closure devices. An inspection log must be maintained. <u>265.1085</u> (c)(4)

### Subpart J:

- PE Certification on site for design standards, integrity, leak test, tightness check. 265.191 or 265.192 (depending on age of tank). Existing tank installed prior to July 14, 1986. New tank system if installed after this date. Certifications must include statement at 270.11(d). Assessment components vary for either "Existing" or "New" tank.
- 2. Tank system equipped with secondary containment. \_\_\_\_\_ 265.193
- 3. Tank system equipped with leak detection system if leak would not be detected within 24 hours. \_\_\_\_\_\_.265.193 (c)(3)
- 4. Secondary containment must de design to contain 100% of the capacity of the largest tank. \_\_\_\_\_\_265.193 (e)
- 5. Ancillary equipment must have secondary containment. \_\_\_\_\_ 265.193(f) <u>or</u> Ancillary equipment must be inspected daily. 265.193 (f)
- 6. Daily tank system inspections must be conducted and recorded. \_\_\_\_\_ 265.195 (a)
- 7. Any leaks or spills since last inspection or during inspection?
- 8. Tank systems must be properly labeled and dated. \_\_\_\_\_ 262.34

<b>Company Name:</b>	Secure metuls Welding 1	Procl.
EPA ID Number:	Neb 980-841-951	
Date: 16 A	put 08	

### **Required Records/Document Checklist**

The generator must provide and make available, but not limited to, any persons knowledgeable of your HW management program and the following records/documents at the time of inspection:

- 1. Records of weekly inspection of containers stored in designated Hazardous Waste Storage Areas.
- 2. Records of daily inspection of tanks containing hazardous waste.
- 3. Records of weekly inspection of drip pads (and after storms).
- 4. Job titles for each position related to hazardous waste management and the name of the employee filling each job.
- 5. Job description of positions related to hazardous waste management.
- 6. Written description of type and amount of introductory and continuing training that will be given to each hazardous waste management position.
- Records of annual or introductory hazardous waste training for each employee managing hazardous waste.
- 8. Copies of signed hazardous waste manifests.
- 9. Copy of land ban notification for each hazardous waste transported from facility.
- 10. Copy of latest facility contingency plan.
- 11. Copy of Biennial Report.
- 12. Copy of written, description or other type of Waste Minimization Plan.

I acknowledge or certify that the noted records/documents were requested and that all records currently available and staff cognizant of these records were made available at the time of the inspection.

4-16-08 Signature: **Facility Contact or Representative Inspection Date** 

NIFO	or type. (Form designed for RM HAZARDOUS 1.Get STE MANIFEST:	nerator ID Number	5	2. Page 1 o		gency Response		· · ·	Fracking Nu	Approved. ( mber 3593	មាល ភាពប	
Gene	rator's Name and Mailing Add	ress a robe a real real	80841951			r's Site Address (			s)			
	Mana Hones er gondel		008611 B. NC 28658	0-809 /				ta shi ashi			· · · · ·	3 2 2 2 3 4 •
enera	tor's Phone: (628) 465-6		o granara	·	en en en La segui	ne di su Mangeran	d N∏reka ⊾in ingedik	i talef ter erst. Şiferi ile element	se ministra Programa	нотоки с 892.006 - 2.009	 N 1935-94	
Trans	sporter 1 Company Name	د که بیش میلان ایمار این وست از او کار	i ali chi chi ce incluin Remi giornanti Resta	-114	64 P	n Michilden ( Nach an Star	en i se i	U.S. EPA ID N			ga ka gara in	
Trans	Envirte Of	Cosso Inc.		····				U.S. EPAID N		5568992	2 6 83 9 9 9 <u>8 41 1 9 7</u> 2	<u></u>
e nien:	. Round partial units to the	of enclosed to she to	an jatim many fina da	u stoow i		1. 1998 1. 1998	4		· · · · · ·			ni a de cara Na de cara
Desig	nated Facility Name and Site	Address the live left and	anen la striu ofshoma à seu haté units des	o en co Je Busse			eto-r	<b>U.S. EPA ID ໂ</b> 1910 ປີ <b>1</b>				
	alopiaso 2050 Centr	ol Ave SE. Cas	ton, OII 44707	Server -				111 .	ېن مېرىد قىر 1 د مىرە	Agent Anna Agent Anna		
acility	s Phone: (800) 715-		r joer We <del>and in die genee</del> <u>wie is gedie die genee</u>		jo.		<u>65.892 -</u>	bes not early	្លុំឲ្យព	19805685	192	, ac da
a. IM	9b. U.S. DOT Description (inc and Packing Group (if any)) <sub>A</sub>	duding Proper Shipping Na	me, Hazard Class, ID Num	iber,	enti da	10. Contain	ers Type	11. Total	12. Unit WL/Vol.		Vaste Code:	S
K	. RQ, Hazardou	ware Light.	n.o.s., 5, NA308	2, PG 01		Contra H2				D985		
	<ul> <li>P = Paua(<b>CRACI)</b></li> <li>T = Tone (2000 Pounds)</li> </ul>	e de la companya de l La companya de la comp	emingori Atro Sciencia Inte		ove est i	tie çötaret	CM 10-0.5407074	15	2		ing side Ing side	
-	2		e <u>n ti SARA na standar</u> Ma G	4 - 44		<u>en e e de cen</u> Star felancia	nono ti or	<u>an an an an Anna An</u> Line às an Anna	المبر الأمريني الرجي الأمرين	nango p <sup>ulu</sup>		<u> </u>
	ਗ੍ਰਮਤਰ ਤਰ ਪ੍ਰਾਮਨ ਇਹਰਜਾ, ਟੂਰੇਸ਼ ਭੂਪਿਡਰ 10 (ਤਮ ਦਾਸ ਮਾਹਜਾ, ਤੁਹਾਹਰ			et M		a sur a cor	10 en rein		N. 19	राजेनें र मन्त्र	 	
_	3.			-145 . <u>4</u> 55		entari ye etha	ં ટુપ્લામં	<u>ar 18 a to 18</u> 	ት - ትር አን <b>ት</b> 18 ዓ.		idenen cu denen cu	10 48 (S) 12 14 ()
16.1	re vaon waste staalin ider oref codes muit de ontere	bet ofter production i con	to se ferre 3, enfisitere el 1969, podes tratimo	and Th		are den parte Armoder - Ar		are faite in the second se	n Arsan Anna Arsan		96501000	્યુપ્ય દ
to e	resentative of the propertie	der Som iste rom viker	च्चा इन्द्र ६ सिख्येंकी मध्य ज 	ាល់ដែលខ្ល <u>ា</u> ប្រាស់ស	ohglame (	set and and a pl		<u>an en /u>	Land Your	ann sa noi	n ta nafinin Shuni ta ta	- 9,00 2 - 9 - 1
			an ng tri san gasa sa sa		ا ساف دا دران		ine Nuert.		merro Tich end		39 	. <del></del>
4.4.4	nent-specific information n	ainabieno arete dan in	at an an and so a construction	14980 14 oct	ti a ci trajecto		-n 2'≤ - <b>3€</b>	Ner o utiliz	N 28 - 125		e prene eles eles	5 81 549 51.
<b>91-1</b>	ecial Handling Instructions and Trouble // 1 4351 bbs telms of eoclar and rec	ERG #171	ೆ ಸಂಪರ್ಧ ಕ್ರಮ್ಮ ಸಂಪರ್ಧ ಕಾರ್ಯಕ್ರಮ ಸಂಪರ್ಧ ಸಂಪರ್ಧ	5 617 93 16	510	nus é a colúe. Matinamoster				in Einerte Einer einer Afri	mber og si altin - si	ula enclara Intelación
000.4	s, stor ns i pomosi names Ist taos i pomosi names	sianstem : second tisme	<u>Եր Հել դարինալ էր էր։</u>	Rite 3 Russia	•			••••		Tati will	ખોદમાં કલે	计算法算法
5., G	ENERATOR'S/OFFEROR'S C	CERTIFICATION: I hereby	declare that the contents	of this consignme	nt are fully a	sound entrol entrol	scribed above	by the proper sl	nipping nām	e, and are clas	sified, pack	aged) 3 m
ະວາ 46 <b>ກ</b> ູ	arked and labeled/placarded, xporter, I certify that the conter	and are in all respects in p	roper condition for transpor	rt according to ap	plicable inte	mational and nati	onal governm	ental regulations	. If export st	ipment and La	am the Prim	ary date 3
	certify that the waste minimization s/Offeror's Printed/Typed N	1000 C			enerator) of Signature	(b) (if I am a sma	all quantity ge	nerator) is true.	ica an eo r	Mor	Sec. and some non-	
19/15/	D TA TOT ATO UN 1501	i tratupat seleb ec viea	etadus 804 bes shodq berucarint concer ne	descri	NL	mikes	fore-	rik, Bradiaciot <b>‱≓</b> , cya≋ bety	ಗಳನ್ನು ಸಂ ಶೇಷ-ಜನಗ	istone rije Stone [kr	4 11	108
	emational Shipments	Import to U.S.	กันสาช พ.ศ.ช.55 ริษร์ กรีบ	Export fro	m U.S.	Port of er	e icena die itry/exit:	Terbittes and States and	enne git	in in the second	i itan un	र चार भिक्ता च्याहरू
	porter signature (for exports on insporter Acknowledgment of R					Date leav	ing U.S.:	<u></u>	<u></u>	<u>e 4. j. zere</u> e	<u></u>	<u>a</u>
	orter 1 Panted Typed Name		i ala farana ƙa paraka ka <del>Panana ka paraka k</del>		Signature	A. J.	de 22	<u>enter commune</u> El popular de la	<u>na na se</u> Maria	Mor	ith Day	Year
lo:t// Tràdisc	orter:2 Printed/Typed Name 3	Salut (SRUAR) - 445	105 militar milita (mila) Petrologia (militar (mila)	oobus	<u>C</u> Signature	<u>OH K</u>	11.0.10		<u>n an an a</u>	Mor	nth Day	Year
1.	n a si bitu beregi na vire: a da adi ta taptan an ta		ು ವಸ್ಥೇಕ ಸಂಭ ಸ್ಥಾರ್. ೧೯೯೫ರಲ್ಲಿ ಸಂಭ	19,841 (1905)		र उत्तर विकास स्थल उद्य विकास	ೆ ಸಕ್ಷಾನೆಗೆ ತಿ	ven e≹er it		e. 4. 3		ig des to
	screpancy in a in a suit tan s				ا الاتحامة المالية. 	an a garan ay	definition and and and and and and and and and an	na annsa a se	a ji kota i Nan an	e Alexandra Geografia	and a second	2011 वि. मि. 12 देव देव में स्व
o de	liscrepancy Indication Space loopact is a cost three cab	asola poetene - car	Тур	101244-1. 10 11 11 12	na san <b>k</b>	Residue	a <b>t</b> he b	Partial R	*****	and so t	Full Rej	jection 🖂
deinn	nerop Isao ten has iuradĝ <u>aut in anan menop</u> Sa	VERTOR WITH TONS	ne <u>n s fa tesava h</u> uana		N	lanifest Referenc			8121 (L. 9 	ана (р. 1996) 1997 — <u>При</u> ла		
	Itemate Facility (or Generator)				۰.	1.2 M 2 M	$\delta_{1}^{-1}(\theta t_{j}) < 0$	U.S. EPA ID	Number	وی کار دو کرد. محمد و سر از ا	91-60,701 404910	ានរោះដំឡើ សារ
.!!	terralida era to totera era to ys Phone:				•	mia entre	× saΩn	al inter		· · · · · · ·	National Sec 1	
18c. S	ignature of Alternate Facility (c					1				e en ca	onth Da	ay Year
	volome eru an anpla Submi					cycling systems)				<u>na tra 17</u> Suprati	than sou Chan sou	<u></u>
	ati ni bariupar arsishicis na		WARNER BUILD HE RE	de 181019	3.	-,		0-1,40 <b>4:</b> **				
		.	· Deta	Martin At	ಕಾರಿದ್ದರು	s planoitté s	alan) Astress	9:03271 <del>3</del> 7 5 3 5 5 5 1	动动物	torraicai	iau th D	est stall
	esignated Facility Owner or Op											

Report run on: April 15, 2008 - 3:37 PM

EPA Region 04	Extra	ct Flag:	N	Facility	dentifi	er:	County: C	201	AWBA							
Universes				erator: ating TSD	LQ F: —		Transpo IC In Pl			Active El Ind	-	(HE/G	Y W): N/	'N		
Activity Location:	: NC	Source	Type:	Other - I	3	Sec	ą. Number:	2		Receive	Date:	26 API	R 2006		Report Cyc	le: 2005
ther/Previous Site	Name:	SPECIAL	META	LS WELD	NG PRO	ODUC	TS	_								
		IS ROAD IC 28658-	-1754						Mailing Address:	1401 BUI NEWTON UNITED	N, NC 2	28658-1	754	_ <u>.</u>		
ontact Person for Source Information	(8	AN E. JO 28) 465-0 JONES@	352 ext		U	NITED	STATES					•				
<b>Wer (current)</b> UNTINGTON ALL From: 11/26/2003	OYS To:				н	JNTIN	VERSIDE D GTON, WV IGTON						ype:   hone:	Private		
Dperator (current)			<u> </u>			_	JRRIS ROAL	 D				 T	ype:	Private		
SPECIAL METALS from: 11/26/2003	WELDI To:	ng proi	OUCTS		NE		N, NC 2865		754				hone:			
and Type: Priva	ate		Non N	lotifier:	No		Com	merc	cial Availab	oility: Unkn	own	·		Ts	d Date:	
Accessibility:			No. E	mployees:			State			,						
IAICS Codes:	331491	Nonferr		<u> </u>		r and A	Aluminum) F	2 ollir	n Drawing	n and Extra	nding				<u> </u>	
Regulated Waste A																
lazardous Waste G			- Fede	eral: Large	Quantit	·	erator; Stat			STATE REG	GULAT	ED				
lazardous Waste G ransfer Facility:	Generati	or Status			Quantit	U		ivitie	25				ation Us	sed Oil	Burner:	
lazardous Waste G ransfer Facility:	Generati /aste Ge	or Status			Quantit	U	sed Oil Acti Jsed Oil Tra Transpor	ivitie Inspo rter:	es orter Activi		Off-S					
Hazardous Waste G Fransfer Facility: Other Hazardous W Importer Activity Mixed Waste Ge Fransporter Activity:	Generato	or Status			No No No	່ <b>ປ</b> ະ ເ	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro	ivitie Inspo Iter: Faci	es orter Activit ility: sor and/or	ty No	Off-S Used N	Specifica 1 Oil Fu Marketer	el Mark r who di ification	eter Ac irects s used o	tivity hipment iil to	
Hazardous Waste G Transfer Facility: Other Hazardous W Importer Activity Mixed Waste Ge Transporter Activity: TSD Activity:	Generato	or Status			No No	່ <b>ປ</b> ະ ເ	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner Ar Processo	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No No	Off-S Used M C	Specifica 1 Oil Fu Marketer off-speci	el Marke r who di ification ification	eter Ac irects s used o used o	tivity hipment il to il burner.	
Hazardous Waste G Iransfer Facility: Other Hazardous W Importer Activity	Generati Vaste Ge v: enerato	enerator A	Activities		No No No	່ <b>ປ</b> ະ ເ	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner Ac	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No	Off-S Used M C C	Specifica 1 Oil Fu Marketer off-speci	el Mark r who di ification ification r who fi	eter Ac irects s used o used o rst clain	tivity hipment il to il burner: ns the used	
Hazardous Waste G Transfer Facility: Other Hazardous W Importer Activity Mixed Waste Ge Transporter Activity: TSD Activity: Recycler Activity:	Generato Vaste Ge r: enerato : : : : : :	or Status enerator A r. trial Furna Burner Ex.	Activities	5	No No No		sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner Ar Processo	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No No No	Off-S Used M C Des	Specifica 1 Oil Fur Marketer off-speci off-speci Marketer	el Marko r who di ification ification r who fiu s the sp	eter Ac irects s used o used o rst clain ecificat	tivity hipment il to il burner: ns the used	
Hazardous Waste G Transfer Facility: Other Hazardous W Importer Activity Mixed Waste Ge Transporter Activity: TSD Activity: Recycler Activity: Exempt Boiler and/c Small Quantity ( Smelting, meltin Exemption: Universal Waste A Description	Generato /aste Ge /: enerato : : : : : : : : : : : : : : : : : : :	or Status enerator A r. trial Furna Burner Ex ing Furna	Activities	5	No No No No		sed Oil Acti Jsed Oil Tra Transfor Jsed Oil Pro Re-refiner A Processo Refiner:	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No No No No	Off-S Used M C Des	Specifica I Oil Fur Marketer Marketer Marketer Marketer il meets	el Mark r who di ification ification r who fin s the sp 	eter Ac irects s used o used o rst clain ecificat	tivity hipment il to il burner: ns the used jons: h ated	Accumulate
Azardous Waste G ransfer Facility: Dther Hazardous W Importer Activity Mixed Waste Ge ransporter Activity: SD Activity: Recycler Activity: Exempt Boiler and/c Small Quantity C Small Quantity C Smetting, meltin Exemption: Universal Waste A	Generato Vaste Ge r: enerato : : : : : : : : : : : : : : : : : : :	trial Furna Burner Excloses es:	Activities	5	No No No No		sed Oil Acti Jsed Oil Tra Transfor Jsed Oil Pro Re-refiner A Processo Refiner:	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No No No No	Off-S Used M C Des	Specifica I Oil Fur Marketer Marketer Marketer Marketer il meets	el Mark r who di ification ification r who fin s the sp 	eter Ac irects s used o used o rst clain ecificat	tivity hipment il to il burner. ns the used ions:	Accumulate
Azardous Waste G ransfer Facility: Other Hazardous W Importer Activity Mixed Waste Ge ransporter Activity: SD Activity: Recycler Activity: Exempt Boiler and/o Small Quantity C Small Quantity C Smelting, meltin Exemption: Universal Waste A Description Batteries amps Pesticides	Generato Vaste Ge r: enerato : or Indus Onsite E g, Refir Activiti Activiti equipm rdous V	enerator A r. trial Furm Burner Exc ing Furma es: ent	Activities ace emption ace	3	No No No No No	U: U: F Un Inji	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner A Processo Refiner:	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No No No No	Off-S Used M C Des	Specifica I Oil Fur Marketer Marketer Marketer Marketer il meets	el Mark r who di ification ification r who fin s the sp 	eter Ac irects s used o used o rst clain ecificat	tivity hipment iil to sil burner. ns the used ions: A the used N A N N N	Accumulate Managed N N N
Azardous Waste G ransfer Facility: Ther Hazardous W Importer Activity Mixed Waste Ge ransporter Activity: SD Activity: SD Activity: Recycler Activity: Exempt Boiler and/o Small Quantity O Small	Generation /aste Generation : enerator : Dr Indus Dr Indus Dr Indus Dr Indus Cor Indus Co	or Status enerator A r. trial Furma Burner Exc ing Furma es: ent Vastes (a:	Activities ace emption ace	3	No No No No No	U: U: F Un Inji	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner A Processo Refiner:	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No No No No	Off-S Used M C Des	Specifica I Oil Fur Marketer Marketer Marketer Marketer il meets	el Mark r who di ification ification r who fin s the sp 	eter Ac irects s used o used o rst clain ecificat	tivity hipment iil to sil burner. ns the used ions: A the used N A N N N	Accumulate Managed N N N
azardous Waste G ransfer Facility: Ther Hazardous W Importer Activity Mixed Waste Ge ransporter Activity: SD Activity: SD Activity: Executer Activity: Executer Activity: Small Quantity C Small	Generato Vaste Ge r: enerato : or Indus Onsite E g, Refir Activiti Activiti rdous V : D005	enerator A r. trial Furma Burner Ex hing Furma es: ent Vastes (a: tion	ace emption ace s report	s n: ed on Site	No No No No No	U: U: F Un Inji	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner A Processo Refiner:	ivitie inspo rter: Faci ocess ctivit	es orter Activit ility: sor and/or	ty No No No No	Off-S Used M C Des	Specifica I Oil Fur Marketer Marketer Marketer Marketer il meets	el Mark r who di ification ification r who fin s the sp 	eter Ac irects s used o used o rst clain ecificat	tivity hipment iil to sil burner. ns the used ions: A the used N A N N N	Accumulate Managed N N N
Azardous Waste G ransfer Facility: Ther Hazardous W Importer Activity Mixed Waste Ge ransporter Activity: SD Activity: SD Activity: Ecycler Activity: Exempt Boiler and/c Small Quantity G Small	Generato Vaste Generato enerato : or Indus Onsite E g, Refir Activiti equipm rdous V : D005 nforma	enerator A r. trial Furma Burner Ex ing Furma es: ent Vastes (at tion	ace emption ace s report	s n: ed on Site	No No No No No	Un Inju cation I	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner A Processo Refiner:	vitte inspo rter: Fac ocess ctivit for:	es orter Activit ility: sor and/or	ty No No No No	Off-S Used M C Des Uni	Specifica d Oil Fur Marketer ff-speci Marketer il meets stination versal V	el Marka r who di fication r who fin s the sp n Facility Vaste:	eter Ac irects s used o used o rst clain ecificat y for Genera	tivity hipment iil to sil burner. ns the used ions: A the used N A N N N	Accumulate Managed N N N N
lazardous Waste G ransfer Facility: Other Hazardous W Importer Activity Mixed Waste Ge ransporter Activity: SD Activity: Recycler Activity: Exempt Boiler and/c Small Quantity C Small Quantity C Smelting, meltin Exemption: Universal Waste A Description Matteries amps Vesticides Aercury containing Description of Haza PA Waste Codes: Biennial Report In	Generati Vaste Ge r: enerato : or Indus Onsite E g, Refir Activiti equipm rdous V : D005 nforma ort detai	enerator A r. trial Furma Surmer Exclosing Furma es: ent Vastes (a: tion I informat	Activities ace emption ace s report ion avai	ed on Site ilable. Other - I	No No No No Identific	U L L Un Inju	sed Oil Acti Jsed Oil Tra Transpor Transfer Jsed Oil Pro Re-refiner Ar Processo Refiner: aderground ection Contr Form)	vitte inspo rter: Fac ocess ctivit for:	es orter Activit ility: sor and/or	ty No No No	Off-S Used M C Des Uni	Specifica d Oil Fur Marketer ff-speci Marketer il meets stination versal V	el Marka r who di fication r who fin s the sp n Facility Vaste:	eter Ac irects s used o used o rst clain ecificat y for Genera	tivity hipment il to il burner: ns the used ions: A ated N N N N N	Accumulate Managed N N N N

Report run on: April 15, 2008 - 3:37 PM

#### NCD980841951 SPECIAL METALS WELDING PRODUCTS

Continued...

Contact Person For Source Information	ALAN E. JO (828) 465-03 AJONES@!		UNIT	ED STATES					
Owner (current) HUNTINGTON ALLC From: 11/26/2003 Notes: Owner name of	То:	from emergence f	HUN HUN	0 RIVERSIDE DI ITINGTON, WV ITINGTON pter 11 Bankrupt	25706		Type: Phone:	Private	
Operator (current) SPECIAL METALS V From: 11/26/2003 Notes: Operator nam	VELDING PROD	DUCTS	140 NEV NEV	1 BURRIS ROAL VTON, NC 28658 VTON	) B	ormer name is	Type: Phone: Inco Alloys Inte	Private mational, Inc.	
Land Type: Privat Accessibility:	<del>e</del>	Non Notifier; No. Employees:	No		nercial Availabil District:	ity: Unknown		Tsd Date:	- <u></u>
NAICS Codes: 33	31491 Nonferre	ous Metal (except	Copper a	and Aluminum) R	olling, Drawing,	and Extrudin	9		
Notes: NC Regulated Waste A Hazardous Waste Ge Transfer Facility:		Federal: Large	Quantity	Generator; State		TATE REGUL	ATED		
Other Hazardous Wa	ste Generator A	ctivities		L	nsporter Activity		ff-Specification L	Ised Oil Burner	
Importer Activity: Mixed Waste Ger		CITICS	No No	Transpor Transfer	ter:	No	sed Oil Fuel Mar		
Transporter Activity: TSD Activity: Recycler Activity:			No No No	Used Oil Pro Re-refiner Ac Processo	•	No	off-specificatio off-specificatio	n used oil burner:	No
Exempt Boiler and/or	Industrial Furna		- <u> </u>	Refiner:		No	oil meets the s	first claims the use pecifications:	ea No
Small Quantity O Smelting, melting Exemption:	nsite Burner Exe	emption:	No No	Underground Injection Contr	ol:		Destination Facil Iniversal Waste:		No
Universal Waste A Description Batteries Lamps Pesticides Mercury containing e								Generated N N N N	Accumulated/ Managed N N N N N
Description of Hazard EPA Waste Codes:	•	reported on Site	Identifica	tion Form)					
Biennial Report In	formation								
No Biennial Repor	t detail informati	on available.							
Activity Location:	NC Source	Type: Biennial	Report	Seq. Number:	7	Receive Dat	e: 08 MAR 200	2 Report C	Cycle: 2001
Other/Previous Site I	Name: SPECIAL	METALS WELDI	NG PRO	DUCTS CO	<u>.                                    </u>				
	BURRIS RD FON, NC 28658				Mailing Address:	1401 BURRI NEWTON, N UNITED STA	C 28658		
<b>Contact Person</b> For Source Information Geometric Type Co	de:	AYO 352 ext. 221		ED STATES	Method:		Reference Po	int Code:	
Horizontal Accuracy				ontal Reference				Scale Numbers: 0	
Land Type: Privat	te	Non Notifier:	No		mercial Availabi	lity: Unknown	1	Tsd Date:	
Accessibility:		No. Employees:	0	State	District:				

NAICS Codes:

331491 Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding

Report run on: April 15, 2008 - 3:37 PM

### NCD980841951 SPECIAL METALS WELDING PRODUCTS

### Continued...

333992 Welding and Soldering Equipment Manufacturing

#### Notes: NC

**Regulated Waste Activities** 

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: 04-1 default, Large Quantity Generator

Transfer Facility:		Used Oil Activitie	es			
Other Hazardous Waste Generator Activities		Used Oil Transp	orter Activi	ty	Off-Specification Used Oil Burner:	Unknown
Importer Activity: Mixed Waste Generator:	No No	Transporter: Transfer Fac		nknown nknown	Used Oil Fuel Marketer Activity	
Transporter Activity: TSD Activity:	Unknown No	Used Oil Proces Re-refiner Activit			Marketer who directs shipment off-specification used oil to off-specification used oil burner	: Unknown
Recycler Activity: Exempt Boiler and/or Industrial Furnace	Unknown	Processor: Refiner:		nknown nknown	Marketer who first claims the us oil meets the specifications:	sed Unknown
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	Unknown Unknown	Underground Injection Control:	U1	nknown	Destination Facility for Universal Waste:	Unknown
Universal Waste Activities: Description Batteries Lamps Pesticides Mercury containing equipment					Generated U Y U U	Accumulated/ Managed U Y U U U
Blennial Report Information						
Total Quantity Reported (Tons): Genera	ted: 25 Mana	aged: 0 Shipped: 2	5 Recei	ved: 0		
HAZARDOUS WASTE, SOLID, N.O.S., BAR 5 0 EPA Waste Codes: D005 HAZARDOUS WASTE, SOLID, N.O.S., LEA 0 0 EPA Waste Codes: D008 HAZARDOUS WASTE, LIQUID, FLAMMABL 0 0 EPA Waste Codes: D001, D035	D .E, INK BOTTLE	ES		Shipped	Offsite Management Method 5 H111 - STABILIZATION OR CI FIXATION 0 H111 - STABILIZATION OR CI FIXATION 0 H061 - FUEL BLENDING	IEMICAL
Activity Location: NC Source Type: N		Seq. Number: 2		Receive D	ate: 08 JAN 2001	
Other/Previous Site Name: SPECIAL METALS Location 1401 BURRIS ROAD Address: NEWTON, NC 28658	WELDING PRO		Mailing Address:	1401 BURI NEWTON, UNITED S	NC 28658	
Contact Person         JOHN MAYO           For Source         (828) 465-0352           Information         Information	1401 BURR NEWTON, N UNITED ST	NC 28658				
Owner (current) SPECIAL METALS From: 01/01/0001 To:	н	200 RIVERSIDE DR UNTINGTON, WV 257			Type: Private Phone: (304) 526-5100	- <u>-</u>
Geometric Type Code: Horizontal Accuracy Measure:		tzontal Collection Met izontal Reference Dat			Reference Point Code: Source Map Scale Numbers:	0
Land Type: Private Non Not	fier: No	Commer	rcial Availat	oility: Unknow	wn Tsd Date:	
Accessibility: No. Emp	loyees: 0	State Dis	strict:			

.

Notes: NO NOTIFICATION COMMENTS MAINTAINED ON W

Report run on: April 15, 2008 - 3:37 PM

### NCD980841951 SPECIAL METALS WELDING PRODUCTS

Continued...

#### **Regulated Waste Activities**

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility:	Used Oil Activities			· 
Other Hazardous Waste Generator Activities	Used Oil Transporter Ad	tivity	Off-Specification Used Oil Burner:	No
Importer Activity: Unknown Mixed Waste Generator: Unknown	Transporter: Transfer Facility:	No No	Used Oil Fuel Marketer Activity	
Transporter Activity: No TSD Activity: No	Used Oil Processor and Re-refiner Activity	/or	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Recycler Activity: No Exempt Boiler and/or Industrial Furnace	Processor: Refiner:	No No	Marketer who first claims the used oil meets the specifications:	No
Small Quantity Onsite Burner Exemption: Unknown Smelting, melting, Refining Furnace Exemption: Unknown	Underground Injection Control:	No	Destination Facility for Universal Waste:	No
Description of Hazardous Wastes (as reported on Site Identified EPA Waste Codes: D002, D005, D035, F002	cation Form)			
Activity Location: NC Source Type: Biennial Report	t Seq. Number: 6	Recei	ve Date: 23 FEB 2000 Report Cycle:	1999
Other/Previous Site Name: INCO ALLOYS INTERNATIONAL	INC			
Location 1401 BURRIS RD Address: NEWTON, NC 28658	Mailing Addres		3URRIS RD ON, NC 28658	
Contact Person         AHMAD SEYEDTALEBI           For Source         (828) 526-5683           Information         Information				
Land Type: Bad code - U Non Notifier: No	Commercial Ava	ailability: Ot	her - U Tsd Date:	<u> </u>
Accessibility: No. Employees:	State District:			
NAICS Codes: 333992 Welding and Soldering Equipme Regulated Waste Activities Hazardous Waste Generator Status - Federal: Large Quantil Transfer Facility: Unknown	-			]
Other Hazardous Waste Generator Activities	Used Oil Transporter Ad	ztivity	Off-Specification Used Oil Burner:	Unknown
Importer Activity: Unknown Mixed Waste Generator: Unknown	Transporter: Transfer Facility:	Unknown Unknown	Used Oil Fuel Marketer Activity	
Transporter Activity: Unknown TSD Activity: No	Used Oil Processor and Re-refiner Activity	Vor	Marketer who directs shipment off-specification used oil to off-specification used oil burner.	Unknown
Recycler Activity:         Unknown           Exempt Boiler and/or Industrial Furnace         Industrial Furnace	Processor. Refiner:	Unknown Unknown	Marketer who first claims the used oil meets the specifications:	Unknown
Small Quantity Onsite Burner Exemption:UnknownSmelting, melting, Refining FurnaceUnknownExemption:Unknown	Underground Injection Control:	Unknown	Destination Facility for Universal Waste:	Unknown
Biennial Report Information				
Total Quantity Reported (Tons): Generated: 24 Man	aged: 0 Shipped: 24 Re	ceived: 0		
Top 10 GM Forms Summary by Largest Quantity of Haz	ardous Waste Generated (A	VI quantitie	s are in tons)	
Generated Managed Onsite Managemen	·····	Shippe	ed Offsite Management Methods	
BARIUM CONTAINING COMPOUND FROM WELDING FL 4 0 EPA Waste Codes: D005			4 H111 - STABILIZATION OR CHEMIC FIXATION	AL
PARTS WASHER, A PETROLEUM NAPHTHA RECYCLED	) SOLVENT, PROVIDED AND	) SERVICE	D BY SAFETY KLEEN. 0 H020 - SOLVENTS RECOVERY	
EPA Waste Codes: D039				

•

Report run on: April 15, 2008 - 3:37 PM

# NCD980841951 SPECIAL METALS WELDING PRODUCTS

Continued...

Top 10 GM Forms	Summary - co	ntinued	(All quantities a	re in tons)					
Generated	Managed		te Management I			Shipped		nagement Methods	
PRINTING INK EM		CONTAII	NING SOME SPE	INT INK THAT CO	ONTAINS N	NETHYL ETHY	L KETONE AND 0 H061 - FUE		
EPA Waste Code									
Activity Location:	NC Source	Type: E	Biennial Report	Seq. Number:	5	Receive	Date: 13 NOV 1	998 Report Cycle	: 1997
Other/Previous Site N	Name: INCO AL	LOYS INT	ERNATIONAL IN	1C		.,			
	BURRIS RD ON, NC 28658				Mailing Addres		RRIS RD 1, NC 28658		
<b>Contact Person</b> For Source Information	AHMAD SE (304) 526-5		 ЕВІ		<b>-</b>				
Land Type: Bad c	ode - U	Non Not	tifier: No	Comn	nercial Ava	ilability: Other	·- U	Tsd Date:	- <u></u> ,
Accessibility:		No. Emp	ployees:	State	District:				
		g and Solo	dering Equipment	Manufacturing					
Regulated Waste A				<b>.</b> . <b>.</b> .					
Hazardous Waste Ge	enerator Status	- Federa	• •	r			. <u></u>	<u> </u>	
Transfer Facility:			Unknown	Used Oil Acth		·			
Other Hazardous Wa	•••••••••••••••••••••••••••••••••••••••	Activities		Used Oil Trar	•	-	Off-Specificatio	n Used Oil Burner:	Unknown
Importer Activity: Mixed Waste Ger			Unknown Unknown	Transport Transfer I		Unknown Unknown	Used Oil Fuel N	larketer Activity	
Transporter Activity:	<u></u>		Unknown	Used Oit Proc	- Norser and	lor		no directs shipment tion used oil to	
TSD Activity:			No	Re-refiner Ac				ition used oil burner.	Unknown
Recycler Activity:			Unknown	Processor	r.	Unknown	Marketer wi	no first claims the used	
Exempt Boiler and/or	Industrial Furn	ace		Refiner:		Unknown		e specifications:	Unknown
Small Quantity O			Unknown	Underground			Destination Fa	cility for	
Smelting, melting Exemption:	, Renning Fum	ace	Unknown	Injection Contro	ol:	Unknown	Universal Was		Unknown
Blennial Report In	formation								
Total Quantity Repo		Genera	ated: 72 Manag	ged: 0 Shipped	1: 72 Re	ceived: 0			
Top 10 GM Form							m in tone)		
Generated	Managed		te Management i			Shipped	-	nagement Methods	
BARIUM CONTAIN					(SOLID, D				
20		0					20 H129 - OTH	IER TREATMENT	
EPA Waste Code WASTE FLAMMAR		FROMS	URFACE PRINT				ETHM KETONE	AND ETHANOL. (D001,	D035)
1		0						RAGE, BULKING AND/O	•
EPA Waste Cod	Ps: D001 D035	;					TRANSFER	R OFF SITE	
Activity Location:	NC Source	Type: 1	Notification	Seq. Number:	1	Receive	Date: 10 DEC 1	996	
Other/Previous Site I	Name: INCO AL	LOYSWE	ELDING PRODUC	CTS					
	BURRIS ROAD				Mailing		RRIS ROAD		
Address: NEW	ON, NC 28658		<u> </u>		Addres	S: NEWTON	N, NC 28658		
Land Type: Privat	e	Non Not	tifier: No	Com	nercial Ava	ilability: Other	·-U	Tsd Date:	
Accessibility:		No. Emp	ployees:		District:	-			

Report run on: April 15, 2008 - 3:37 PM

### NCD980841951 SPECIAL METALS WELDING PRODUCTS

Continued...

### Notes: NO NOTIFICATION COMMENTS MAINTAINED ON W

**Regulated Waste Activities** 

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility:	Unknown	Used Oil Activities			
Other Hazardous Waste Generator Activities	<u> </u>	Used Oil Transporter Act	ivity	Off-Specification Used Oil Burner:	] No
Importer Activity: Mixed Waste Generator:	Unknown Unknown	Transporter: Transfer Facility:	No No	Used Oil Fuel Marketer Activity	
Transporter Activity: TSD Activity:	No No	Used Oil Processor and/ Re-refiner Activity		Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Recycler Activity: Exempt Boiler and/or Industrial Furnace	No	Processor. Refiner:	No No	Marketer who first claims the used oil meets the specifications:	No
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	Unknown Unknown	Underground Injection Control:	No	Destination Facility for Universal Waste:	
Activity Location: NC Source Type:	<b>Biennial Report</b>	Seq. Number: 4	Receive	Date: 29 JAN 1996 Report Cycle:	1995
Other/Previous Site Name: INCO ALLOYS					
Location 1401 BURRIS ROAD Address: NEWTON, NC 28658		Mailing Address		RRIS ROAD N, NC 28658	
Contact Person M L ANSEL For Source (304) 526-5683 Information	L				
Land Type: Bad code - U Non N Accessibility: No. En	otifier: No nployees:	Commercial Avai State District:	lability: Other	- U Tsd Date:	
Regulated Waste Activities	dering Equipment	Manufacturing			
Hazardous Waste Generator Status - Feder Transfer Facility:	ral: Large Quantity Unknown	Generator; State:			1
	Unknown	Used Oil Activities		Off-Specification Used Oil Burner:	Unknown
Transfer Facility:	Unknown	Used Oil Activities Used Oil Transporter Act Transporter:	ivity Unknown Unknown	Off-Specification Used Oil Burner: Used Oil Fuel Marketer Activity	Unknown
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: TSD Activity:	Unknown Unknown Unknown Unknown No	Used Oil Activities Used Oil Transporter Act Transporter: Transfer Facility: Used Oil Processor and/o Re-refiner Activity	Unknown Unknown	•	Unknown
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity:	Unknown Unknown Unknown Unknown	Used Oil Activities Used Oil Transporter Act Transporter: Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor:	Unknown Unknown	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to	
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: TSD Activity: Recycler Activity:	Unknown Unknown Unknown Unknown No Unknown	Used Oil Activities Used Oil Transporter Act Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor: Refiner: Underground	Unknown Unknown or Unknown	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Marketer who first claims the used	Unknown
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: TSD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace	Unknown Unknown Unknown No Unknown	Used Oil Activities Used Oil Transporter Act Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor: Refiner: Underground	Unknown Unknown or Unknown Unknown	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Marketer who first claims the used oil meets the specifications: Destination Facility for	Unknown Unknown
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: TSD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Blennlal Report Information	Unknown Unknown Unknown No Unknown Unknown Unknown	Used Oil Activities Used Oil Transporter Act Transporter: Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor: Refiner: Underground Injection Control:	Unknown Unknown or Unknown Unknown	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Marketer who first claims the used oil meets the specifications: Destination Facility for	Unknown Unknown
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator: Transporter Activity: TSD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smetting, melting, Refining Furnace Exemption: Blennial Report Information	Unknown Unknown Unknown No Unknown Unknown Unknown	Used Oil Activities Used Oil Transporter Act Transporter: Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor: Refiner: Underground Injection Control:	Unknown Unknown Dr Unknown Unknown Unknown	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Marketer who first claims the used oil meets the specifications: Destination Facility for Universal Waste:	Unknown Unknown
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator. Transporter Activity: TSD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Blennlal Report Information Total Quantity Reported (Tons): Gene Top 10 GM Forms Summary by Largest	Unknown Unknown Unknown No Unknown Unknown Unknown	Used Oil Activities Used Oil Transporter Act Transporter: Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor: Refiner: Underground Injection Control:	Unknown Unknown Dr Unknown Unknown Unknown	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Marketer who first claims the used oil meets the specifications: Destination Facility for Universal Waste:	Unknown Unknown
Transfer Facility: Other Hazardous Waste Generator Activities Importer Activity: Mixed Waste Generator. Transporter Activity: TSD Activity: Recycler Activity: Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption: Blennlal Report Information Total Quantity Reported (Tons): Gene Top 10 GM Forms Summary by Largest	Unknown Unknown Unknown No Unknown Unknown Unknown Trated: 52 Manage Quantity of Hazas	Used Oil Activities Used Oil Transporter Act Transporter: Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor: Refiner: Underground Injection Control: ged: 0 Shipped: 52 Rec rdous Waste Generated (All Methods	Unknown Unknown Unknown Unknown Unknown eived: 0 I quantities a Shipped	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Marketer who first claims the used oil meets the specifications: Destination Facility for Universal Waste:	Unknown Unknown
Transfer Facility:         Other Hazardous Waste Generator Activities         Importer Activity:         Mixed Waste Generator.         Transporter Activity:         TSD Activity:         Recycler Activity:         Exempt Boiler and/or Industrial Furnace         Small Quantity Onsite Burner Exemption:         Smelting, melting, Refining Furnace         Exemption:         Blennlal Report Information         Total Quantity Reported (Tons):         Generated         Managed         BARIUM CONTAINING COMPOUND FRC	Unknown Unknown Unknown No Unknown Unknown Unknown Unknown Inknown Site Management MWELDING FLU	Used Oil Activities Used Oil Transporter Act Transporter: Transfer Facility: Used Oil Processor and/o Re-refiner Activity Processor: Refiner: Underground Injection Control: ged: 0 Shipped: 52 Rec rdous Waste Generated (All Methods X OPERATIONS(SOLID D00	Unknown Unknown Dr Unknown Unknown Unknown Eeived: 0 I quantities a Shipped 5).	Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Marketer who first claims the used oil meets the specifications: Destination Facility for Universal Waste: re In tons) Offsite Management Methods	Unknown Unknown

Report run on: April 15, 2008 - 3:37 PM

Continued							
Activity Location: NC Source Type: E	lionnial Banort	Seq. Number:	2	Pacaiva Da	te: 23 FEB 1994	Report Cycle:	1993
Other/Previous Site Name: INCO ALLOYS INT	ERNATIONAL, I		Ne-111- m				<u> </u>
Location 1401 BURRIS ROAD Address: NEWTON, NC 28658			Mailing Address:				
Contact Person M L ANSELL For Source (304) 526-5683 Information							
and Type: Bad code - U Non Not	ifier: No	Comm	nercial Availa	bility: Other -	U	Tsd Date:	
Accessibility: No. Emp	oloyees:	State	District:				
NAICS Codes: 333992 Welding and Solo	lering Equipment	Manufacturing					
Regulated Waste Activities							
Hazardous Waste Generator Status - Federa	I: Large Quantity	Generator; State	:				
Fransfer Facility:	Unknown	Used Oil Activ	/ities			<u> </u>	
Other Hazardous Waste Generator Activities		Used Oil Tran	sporter Activ	ity (	Off-Specification Used	Oil Burner:	Unknown
Importer Activity: Mixed Waste Generator:	Unknown Unknown	Transport Transfer I		nknown ເ nknown	Jsed Oil Fuel Markete	r Activity	
Transporter Activity:	Unknown	Used Oil Proc	essor and/or		Marketer who direct off-specification us	ed oil to	
TSD Activity: Recycler Activity:	No Unknown	Re-refiner Act			off-specification us	ed on burner.	Unknown
		Processor Refiner:		nknown nknown	Marketer who first oil meets the speci		Lekeeuw
Exempt Boiler and/or Industrial Furnace							Unknowr
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	Unknown Unknown	Underground Injection Contro	ol: U	nknown	Destination Facility fo Universal Waste:	r	Unknown
Biennial Report Information							
	ited: 47 Manag	ged: 0 Shipped	· 47 Rece				
Top 10 GM Forms Summary by Largest C	·				In Anna'		
	te Management		ierateu (All i	Shipped	Offsite Managen	ant Methods	
HAZARDOUS WASTE LIQUID, FROM A FL 11 0			TAINS SELE	NIUM & LEAD			
EPA Waste Codes: D008, D010							
BARIUM CONTAINING COMPOUND FROM 3 0	I WELDING FLU	X MIXINGOPERA	TIONS (SOL	•	3 H132 - LANDFILL IMPOUNDMENT	OR SURFACE	
EPA Waste Codes: D005					IMPOUNDMENT		
WASTE COMPLICTIPLE LIQUID EDOM DA	RTS CLEANERS	. (PETROLEUMN	APTHA)		0 H141 - STORAGE		:
WASTE COMBUSTIBLE LIQUID FROM PA 0 0					TRANSFER OFF	SITE	
					TRANSFER OFF	SITE	
0 0 EPA Waste Codes: D001, D039	3iennial Report	Seq. Number:	2		TRANSFER OFF \$	SITE Report Cycle:	1991
0 0 EPA Waste Codes: D001, D039			2				1991
0 0 EPA Waste Codes: D001, D039 Activity Location: NC Source Type: E			2 Mailing Address:	Receive Da	nte: 27 FEB 1992 RIS ROAD		1991
0 0 EPA Waste Codes: D001, D039 Activity Location: NC Source Type: I Dther/Previous Site Name: INCO ALLOYS INT Location 1401 BURRIS ROAD	TERNATIONAL I		Mailing	Receive Da	nte: 27 FEB 1992 RIS ROAD		1991
0 0 EPA Waste Codes: D001, D039 Activity Location: NC Source Type: I Dther/Previous Site Name: INCO ALLOYS INT Location 1401 BURRIS ROAD Address: NEWTON, NC 28658 Contact Person JAMES P HUNT For Source (704) 465-0352			Mailing Address:	Receive Da	nte: 27 FEB 1992 RIS ROAD NC 28658		1991

Report run on: April 15, 2008 - 3:37 PM

### NCD980841951 SPECIAL METALS WELDING PRODUCTS

#### Continued...

### **Regulated Waste Activities**

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Hazardous Waste Generator Status - Feder	al: Large Quantity	y Generator; State:			
Transfer Facility:	Unknown	Used OII Activities			
Other Hazardous Waste Generator Activities		Used Oil Transporter A	ctivity	Off-Specification Used Oil Burner:	Unknow
Importer Activity: Mixed Waste Generator:	Unknown Unknown	Transporter: Transfer Facility:	Unknown Unknown	Used Oil Fuel Marketer Activity	
Transporter Activity: TSD Activity: Recycler Activity:	Unknown No Unknown	Used Oil Processor an Re-refiner Activity	d/or	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	Unknow
Exempt Boiler and/or Industrial Furnace		Processor. Refiner:	Unknown Unknown	Marketer who first claims the used oil meets the specifications:	Unknow
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	Unknown Unknown	Underground Injection Control:	Unknown	Destination Facility for Universal Waste:	Unknow
Biennial Report Information					
Total Quantity Reported (Tons): Gener	rated: 39 Mana	ged: 0 Shipped: 39 R	eceived: 0	···· ·· ·· ·· ··· ··· ··· ··· ··· ···	<u>-</u>
Top 10 GM Forms Summary by Largest	Quantity of Hazz	ardous Waste Generated (	All quantities a	are in tons)	
Generated Managed Ons	ite Management	Methods	Shipped	Offsite Management Methods	
COMBUSTIBLE LIQUID FROM DEGREAS 0 0 EPA Waste Codes: D001, D039	ING OPERATION	N IN MAINTENANCE.		0 H020 - SOLVENTS RECOVERY	
Activity Location: NC Source Type:	Blennial Report	Seq. Number: 1	Receive	Date: 28 FEB 1990 Report Cycle	: 1989
Other/Previous Site Name: INCO Alloys Inter	national,.Inc.				
Location 1401 Burris Road Address: Newton, NC 28658		Mailin Addre		rris Road NC 28658	
Contact Person     HAROLD     S Wir       For Source     (704) 465-0394       Information       Land Type:     Bad code - U     Non No		Commercial Av	ailability: Othe	r - U Tsd Date:	
Accessibility: No. En	nployees:	State District:			
Notes: INTEGRAL PART OF FINISHED PRC Regulated Waste Activities Hazardous Waste Generator Status - Feder Transfer Facility:		Generator; State:			
Other Hazardous Waste Generator Activities		Used Oil Transporter A	ctivity	Off-Specification Used Oil Burner:	Unknowr
Importer Activity: Mixed Waste Generator:	Unknown Unknown	Transporter: Transfer Facility:	Unknown Unknown	Used Oil Fuel Marketer Activity	<b>O</b> likilo <b>li</b>
Transporter Activity: TSD Activity:	Unknown No	Used Oil Processor an Re-refiner Activity		Marketer who directs shipment off-specification used oil to off-specification used oil burner:	Unknow
Recycler Activity:	Unknown	Processor: Refiner:	Unknown Unknown	Marketer who first claims the used oil meets the specifications;	Halaau
Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption:	Linkson				Unknowr
Smelting, melting, Refining Furnace Exemption:	Unknown Unknown	Underground Injection Control:	Unknown	Destination Facility for Universal Waste:	Unknown
Biennial Report Information					
Total Quantity Reported (Tons): Gener	rated: 44 Mana	ged: 0 Shipped: 44 R	eceived: 0		
Top 10 GM Forms Summary by Largest	Quantity of Haza	ardous Waste Generated (	All quantities a	are in tons)	
Generated Managed Ons	ite Management	Methods	Shipped	Offsite Management Methods	

Report run on: April 15, 2008 - 3:37 PM

### NCD980841951 SPECIAL METALS WELDING PRODUCTS

Continued...

\* End of Report \*

Subject: Re: DEHNR Guidance for Used Fluorescent Lamp Management From: Steve Barron <Steve.Barron@ncmail.net> Date: Thu, 17 Apr 2008 17:23:22 -0400 To: Alan Jones <ajones@smwpc.com>

AJ

This web site is the best and most current from DENR..

http://wastenot.enr.state.nc.us/hwhome/guidance/guidance.htm

*There will be two files for Lamps Containing Mercury (LCM) and one on the Universal Waste Rules..* 

So.....

for your drum of sodium lamps.....you can handle them as hazardous waste and apply all of those rules.

Or you can handle them a Universal Waste and recycle them....the rules are a little easier but different.

Bottom line.....

-You need to prove to yourself (ie....MSDS from the GE green tubes) that they have been tested and are not hazardous waste, then you can put them into the dumpster as non-haz.

-All the other (black labels, etc) and any untested tubes, would be best handled a Universal Waste.

(ie.....
1- Don't put into the dumpster
2-Put old, used tubes back into their boxes
3-Keep boxes taped closed
4-Label 'Universal Waste-Lamps'
5-Cleanup any broken lamps
6-Tell employees have to clean up broken lamps safely.
7-and use a recycler company to take them for recycling.
8-Date the boxes (there is a one year accumulation date requirement)

Don't grind them up and collect them. You end up with too many other safety problems if you grind them.

ALSO....

I will try to get the recent inspection report to you in the next week.

We are still talking about the haz waste in the pit... So far, I think we will be able to apply the water treatment exemption... That would just leave you with the one violation about the notification of the contingency plan..

You will get a registered letter Notice of Violation. As it stands right now, no fine. You will probably have 30 days to comply, and there will be a follow up inspection to look at the paperwork.

Thanks.....S. Barron

Alan Jones wrote:

Steve,

I found this document today while looking for something else. Can you tell me if this is current? If not, can you direct me to or send me current info for managing fluorescent lamps?

Thanks, Alan Jones Special Metals Welding Products Newton, NC Stephen Barron

Environmental Senior Specialist

NC Department of Environment and Natural Resources

Department of Waste Management