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**Address:** 1401 Burris Rd.      **City:** Newton

**County:** Catawba

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- 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:**

**Box ID Number:**



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.

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](mailto:hlinyard@smwpc.com)  
828-695-2755  
fax 828-465-3447

**SPECIAL METALS WELDING PRODUCTS COMPANY –  
Newton, NC**

Integrated Contingency Plan

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**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**

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## Integrated Contingency Plan

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### SECTION I -- PLAN INTRODUCTION ELEMENTS

#### ***Purpose and Scope of Plan Coverage***

The purpose of this Integrated Contingency Plan (ICP) 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 not 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.

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## 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: SPECIAL METALS WELDING PRODUCTS  
 COMPANY: A Subsidiary of Precision Castparts Corporation  
 NAME:

OPERATOR: HUNTINGTON ALLOYS  
 A SPECIAL METALS COMPANY  
 3200 Riverside Drive

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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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:** 331491 (Nonferrous metal (except copper and  
aluminum) rolling, drawing and extruding)

**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

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## 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 guidance 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.



# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **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.

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## 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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **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 Liquefied 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: **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:

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **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: They 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 off all electrical energy to the hydraulic pump.

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## Integrated Contingency Plan

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### ***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.

Note on Reportable Quantity: 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.

**SPECIAL METALS WELDING PRODUCTS COMPANY –  
Newton, NC**

Integrated Contingency Plan

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**SECTION III -- ANNEXES**

***1. Facility and Locality Information***

*((maps, etc.))*



# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **2.2 Plant Personnel**

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

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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, LEPC)**

Mr. David Weldon - Coordinator

828-465-8233

(cel) 828-302-5139

(alt.: Ms. Shonda Hollis – Administrative Asst.

P.O. Box 389

Newton, NC 28658

828-465-8232

#### **City of Newton Police Department**

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

828-695-4313

828-695-4337

(cel) 828-217-4456

Alternate Numbers: Public Works After-Hours Emergency: 828-465-7430

Mr. Danny Sigmon

828-695-4346

Public Works Normal Hours

828-695-4310

P.O. Box 550

Newton, NC 28658

#### **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

**SPECIAL METALS WELDING PRODUCTS COMPANY –  
Newton, NC**

Integrated Contingency Plan

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**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

336-492-5714  
(cel) 919-270-2186

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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.

**SPECIAL METALS WELDING PRODUCTS COMPANY –  
Newton, NC**

Integrated Contingency Plan

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**3. Incident Documentation**

**Hazardous Waste Release Form**

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

Date: \_\_\_\_\_ Emergency Coordinator: \_\_\_\_\_

Notified of release by: Name \_\_\_\_\_ Position \_\_\_\_\_  
At: \_\_\_\_\_ Time: \_\_\_\_\_

Location of release: \_\_\_\_\_  
\_\_\_\_\_

Released material(s) (state quantity): \_\_\_\_\_  
\_\_\_\_\_

**ASSESSMENT OF HAZARDS:**

Contamination of Creek \_\_\_\_\_ Quantity: \_\_\_\_\_

Contamination of Sewer \_\_\_\_\_ Quantity: \_\_\_\_\_

Contamination of Soil \_\_\_\_\_ Quantity: \_\_\_\_\_

Other \_\_\_\_\_ Quantity: \_\_\_\_\_

**CLEAN-UP REPORT**

1. Describe actions taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Quantity of contaminated material (soil or Water): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. How was material in (2) disposed of? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. What equipment was used in the clean-up? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Has this equipment been cleaned, repaired, and placed back in its proper storage area as stated in the Contingency Plan?  
\_\_\_\_\_  
\_\_\_\_\_

**SPECIAL METALS WELDING PRODUCTS COMPANY –  
Newton, NC**

Integrated Contingency Plan

---

***4. Training and Exercises/Drills Records***

**SPECIAL METALS WELDING PRODUCTS COMPANY –  
Newton, NC**

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.



# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### ***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

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**From:** Proctor, Roberta  
**Sent:** Monday, February 01, 2010 11:43 AM  
**To:** dwilliams@mtnenv.com  
**Cc:** Burch, Brent; Barron, Steve  
**Subject:** 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. Williams [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**                                    )

**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.
7. 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~~ <sup>two</sup> 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.

7 (2) 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](http://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



**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:**  
Media for exposure: direct contact, air, surface water, ground water and soil.  
Human health effects: The health effects of barium depend upon the water-solubility 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:

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**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.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 titles 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.  
Human health effects: The health effects of barium depend upon the water-solubility 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: 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 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 days/events x penalty** = \$  
 +  
**Compliance History**  
**+ 10% per repeat violation** = \$29,250.00

Any other notations:

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**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.  
Human health effects: The health effects of barium depend upon the water-solubility 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** = \$12,000.00

+  
**Multi-Day/Event**  
**# of days/events x penalty** = \$

+  
**Compliance History**  
**+ 10% per repeat violation** = \$

**Any other notations:**

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**Total penalty assessed** = \$12,000.00

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

**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.....*

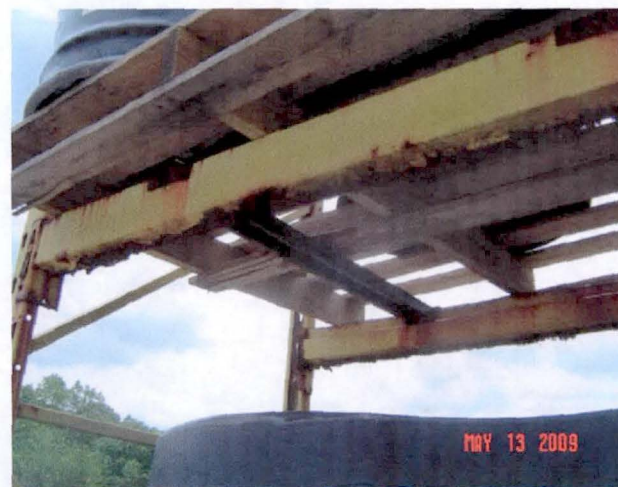
*What would be the clean up standard for Barium??*

*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](mailto: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.  
\*\*\*\*\*



Recial Metal 13 MAY 2009 Bannor



Spent Metal  
13 May 2009  
J. Brown





Paint Metal

26 Aug 2009

Brown

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

Hewitt Linyard [hlinyard@smwpc.com]

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

**To:** Barron, Steve

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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

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14 JAN 10

Special Medal call

- Hewitt humint

got Cong. order \$40k

828-228-4945

Seal work still goes

- wants to talk in Pal.

He is to send email  
with Request.

- Am 10  
or  
- Song





## Barron, Steve

---

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



*Scan*

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

**CERTIFIED MAIL**  
**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,

*Elizabeth 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.**

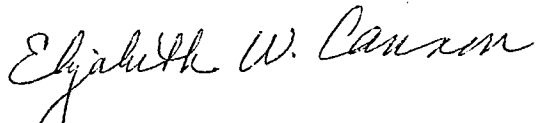
Please be advised that the Department of Environment and Natural Resources has implemented a department-wide policy to release all penalties assessed against facilities to the media. Therefore, the name of your company and the penalty amount that has been assessed against the facility may be released 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,



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**

In Re: **Special Metals Welding Products Company** ) **COMPLIANCE ORDER WITH**  
**NCD 980 841 951** ) **ADMINISTRATIVE PENALTY**  
**Docket # 2009-088** )

**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.

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).

- ii. 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):
- 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](http://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 8<sup>th</sup> day of January, 2010

By: Elizabeth W. Cannon  
Elizabeth W. Cannon, Chief  
Hazardous Waste Section

**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 9.a., 9.c., 9.e. and 9.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:** 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:**  
Media for exposure: direct contact, air, surface water, ground water and soil.  
Human health effects: The health effects of barium depend upon the water-solubility 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.  
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** = \$26,000.00

+  
**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** = \$26,000.00

*Elizabeth W. Cannon*  
**Signature**

*Jan. 8, 2010*  
**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 9.b., and 9.d. 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 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:**  
Media for exposure: direct contact, air, surface water, ground water and soil.  
Human health effects: The health effects of barium depend upon the water-solubility 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.  
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: 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 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:

---

Total penalty assessed = \$12,000.00

*Elizabeth W. Cannon*  
 Signature

*Jan. 8, 2010*  
 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 9.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:** 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:**  
Media for exposure: direct contact, air, surface water, ground water and soil.  
Human health effects: The health effects of barium depend upon the water-solubility 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.  
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** = \$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

*Elizabeth W. Pearson*  
 Signature

*Jan. 8, 2010*  
 Date

Company	Citation	Description	Matrix	Base	Multi-day	Repeat	Total
<b>Special Metals Welding Products Company</b> NCD 980 841 951 Docket # 2009-088	a. 262.34(a)(1)(i)	-- failed to place waste in one storage container;	Maj/Maj	26,000	--	--	26,000
	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)	-- failed to provide annual training for three hazardous waste personnel; -- failed to have job descriptions for hazardous waste personnel; -- failed to update contingency plan	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.

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

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## **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,

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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](mailto:Mike.Williford@ncdenr.gov)  
\*please note new email address

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**Sent:** Thursday, January 14, 2010 6:23 PM  
**To:** Barron, Steve  
**Subject:** Compliance Order - Special Metals - Newton

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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

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[www.specialmetals.com](http://www.specialmetals.com)

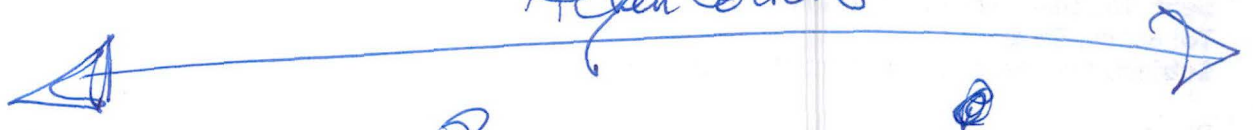
Feb 10

(Doug)  
Robert Douglas -

- Jeffrey Moore (Je/6) (Green Metal)

Hewitt King and (Green Metal)

Helen Cotton



- Contains on Ground? 0

- Rental today =

\$ 32,500

1st \$ 10k



32,500

50%

- Get Cover Sheet 16,250

- Rosen CG5

L



**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](mailto:Steve.Barron@NCDENR.GOV)

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

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**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

**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/hw/home/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

[hlinyard@smwpc.com](mailto:hlinyard@smwpc.com)  
828-695-2755  
fax 828-465-3447

---

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

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**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  
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](mailto:Brent.Burch@ncdenr.gov)

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

---

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

*FYI.....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](mailto:Steve.Barron@NCDENR.GOV)

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\*\*\*\*\*

---

**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

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*

Stephen Barron  
Environmental Senior Specialist  
NC Department of Environment and Natural Resources  
Department of Waste Management  
336-492-5714  
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Conf. Call 11 Aug 09

1 pm

- Special Notice Order Review
- Double Check Register agent

**Compliance Order from Raleigh**

Barron, Steve

**Sent:** Tuesday, August 11, 2009 3:16 PM  
**To:** Hewitt Linyard [hllinyard@smwpc.com]  
**Attachments:** SpecialMetaWelding7AUG09F~1.doc (987 KB)

---

HL

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*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*

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.....



# RCRA Site Detail

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

## NCD980841951 SPECIAL METALS WELDING PRODUCTS

EPA Region: 04 Extract Flag: Y Facility Identifier: County: CATAWBA

Universes Generator: LQG Transporter: N Active: Y  
 Operating TSDF: --- IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: NC Source Type: Notification Seq. Number: 3 Receive Date: 31 MAR 2008

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location 1401 BURRIS ROAD Address: NEWTON, NC 28658	Mailing Address: 1401 BURRIS ROAD NEWTON, NC 28658 UNITED STATES
--	--

**Contact Person** ALAN E. JONES 1401 BURRIS ROAD  
 For Source 828-465-0352 ext. 211 NEWTON, NC 28658  
 Information AJONES@SMWPC.COM UNITED STATES

**Owner (current)** 3200 RIVERSIDE DRIVE Type: Private  
 HUNTINGTON ALLOYS HUNTINGTON, WV 25706  
 From: 11/26/2003 To: HUNTINGTON Phone:

**Operator (current)** 1401 BURRIS ROAD Type: Private  
 SPECIAL METALS WELDING PRODUCTS NEWTON, NC 28658-1754  
 From: 11/26/2003 To: NEWTON Phone:

Latitude/Longitude Measure - Owner: Seq #:  
 Coordinates: ,

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:  
 Accessibility: No. Employees: State District:

NAICS Codes: 331491 Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: NC-4 NC - STATE REGULATED

Other Hazardous Waste Generator Activities

Used Oil Activities	
Importer Activity: No	Used Oil Transporter Activity Off-Specification Used Oil Burner: No
Mixed Waste Generator: No	Transporter: No
Transporter Activity: No	Transfer Facility: No
TSD Activity: No	Used Oil Processor and/or Re-refiner Activity
Recycler Activity: No	Processor: No
Exempt Boiler and/or Industrial Furnace	Refiner: No
Small Quantity Onsite Burner Exemption: No	Marketer who first claims the used oil meets the specifications: No
Smelting, melting, Refining Furnace Exemption: No	Underground Injection Control: No
	Destination Facility for Universal Waste: No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D005

Activity Location: NC Source Type: Biennial Report Seq. Number: 8 Receive Date: 28 MAR 2008 Report Cycle: 2007

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location 1401 BURRIS ROAD Address: NEWTON, NC 28658-1754	Mailing Address: 1401 BURRIS ROAD NEWTON, NC 28658-1754 UNITED STATES
---	---

**Contact Person** ALAN E. JONES UNITED STATES  
 For Source (828) 465-0352 ext. 211  
 Information AJONES@SMWPC.COM

**Owner (current)** 3200 RIVERSIDE DRIVE Type: Private  
 HUNTINGTON ALLOYS HUNTINGTON, WV 25706  
 From: 11/26/2003 To: HUNTINGTON Phone:

**Operator (current)** Type: Private  
 SPECIAL METALS WELDING PRODUCTS  
 From: 11/26/2003 To: Phone:



**Elaine F. Marshall**  
Secretary

North Carolina

**DEPARTMENT OF THE SECRETARY OF STATE**

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

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**Corporation Names**

Name	Name Type
<b>NC</b> Huntington Alloys Corporation	Legal
<b>NC</b> Inco Alloys International, Inc.	Prev Legal

**Business Corporation Information**

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

**Registered Agent**

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

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](mailto:Brent.Burch@ncdenr.gov)

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

---

**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



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**

**FACILITY INSPECTION REPORT**

May 28, 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. **Survey Participants:** 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 Calculations					
Waste shipments D005 Barium Drummed Hazardous Waste					
4/7/2009	Shipped		12 Drums	8,585 lbs.	or 715 # / Drum
5/13/2009	In Inventory During RCRA Inspection				
	<90 Storage area		5 Drums	3,575 lbs.	@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 Satellite Accumulation Drums			100 lbs.	estimate
	In Facility				
	Plus Waste D005 in Sludge Pit			2,500 lbs.	per month based on last year's annual waste generated amount. ( Pit 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:

- Manifests
  - Manifests were 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.
  - Transporter: Enviro of Ohio OHD 980 568 992
  - TSD: Enviro of Ohio OHD 980 568 992

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Phone: 704-663-1699 | FAX: 704-663-6040

- Weekly Inspections
  - Weekly inspections documents were reviewed.
  - 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.**
  - **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.
  - 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.
  
- Contingency Plan
  - 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
  - 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.**
  - Satellite accumulation area at outside baghouse # 5.
    - Consisted of ~~one~~ 55 gal. containers
    - 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 were 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.
  - 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.**
- **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 were present during the inspection.**
- **Subpart BB/CC/J**
  - **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

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Phone: 704-663-1699 \ FAX: 704-663-6040

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.



PHOTO #4



PHOTO #5

Special Metals

- Baghouse #5 Satellite Accumulation Area
- Area not under the direct control of an operator.
- Container not closed.



PHOTO #6



---

**Stephen H. Barron**  
**Environmental Senior Specialist**

---

**Date**

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

✓ Waste in Contract  
✓ Closed

✓ Annual Fin

✓ Job Description

✓ 100%  
?

✓ Release into account

✓ Ante Spec

✓ Contract updated

✓ Sat not under contract

✓ Manifest Signoff

**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

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

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\*\*\*\*\*  
\*\*\*\*\*  
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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 it 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

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\*\*\*\*\*

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

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

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*File email  
29 July 09  
SBS*

**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

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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  
Mooreville, NC 28115

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

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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

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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

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A response was not received from Microsoft Exchange.

To... [Hewitt Linyard \[hlinyard@smwpc.com\]](mailto:hlinyard@smwpc.com)

Cc...

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 it 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

**Special Metals Potential Soils Contamination**

Barron, Steve

**Sent:** Monday, July 27, 2009 3:31 PM  
**To:** 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.

Hewitt 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:**  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

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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

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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  
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Please print or type. (Form designed for use on effie (12-pitch) typewriter)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator ID Number: **NCD980841951** 2. Page 1 of 1 3. Emergency Response Phone: **828-464-0352** 4. Manifest Tracking Number: **001992371 FLE**

5. Generator's Name and Mailing Address: **Special Metals Welding Products, 1401 Burns Road, Newton, NC 28658** Generator's Site Address (if different than mailing address): **828-464-0352**

6. Transporter 1 Company Name: **Envirite of Pennsylvania, Inc.** U.S. EPA ID Number: **PADD10154045**

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: **Envirite of Pennsylvania, Inc., 730 Vogelsong Road, York, PA 17404** U.S. EPA ID Number: **PADD10154045** Facility's Phone: **800-878-1618**

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes		
		No.	Type					
X	1. RQ, Hazardous waste, liquid, n.o.s., 9, NA3082, PG III (D005)	003	DM	165	G	D005		
X	2. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	008	DM	657	P	D005		
X	3. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	EST 100	DM	100	P	D005		
	4.							

14. Special Handling Instructions and Additional Information: **1. EW Approval # 18942 File Ref. # 14853 ERG 171, 2. EW Approval # 18343 File Ref. # 10627 ERG 171, 3. EW Approval # 18344 File Ref. # 10828 ERG 171** Box #: **8003** Trailer #: **8003**

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 (federal and national governmental regulations. If export shipment and I am the Facility 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 identification 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/Officer's Printed/Typed Name: **Shannon Leil** Signature: *[Signature]* Month: **4** Day: **7** Year: **09**

16. International Shipments:  Import to U.S.  Export from U.S. Port of entry (date received) U.S.:

17. Transporter Acknowledgment of Receipt of Materials: Transporter 1 Printed/Typed Name: **JAMES E. MILLER, JR.** Signature: *[Signature]* Month: **04** Day: **09** Year: **09**

18. Discrepancy: 18a. Discrepancy Indication Species:  Quantity  Type  Residue  Partial Rejection  Full Rejection. Manifest Reference Number:

18b. Alternate Facility (or Generator): U.S. EPA ID Number:

Facility's Phone: 18c. Signature of Alternate Facility (or Generator): Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z): **H11 H11 H11**

20. Designated Facility Owner or Operator: Certificate of receipt of hazardous materials covered by the manifest except as noted in item 18a. Printed/Typed Name: **KIRBY E NEWBORN** Signature: *[Signature]* Month: **10** Day: **10** Year: **09**

**Subject:** Special Metals - Newton

**From:** 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  
[hlinyard@smwpc.com](mailto:hlinyard@smwpc.com)  
828-695-2755  
fax 828-465-3447

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



DILAIL

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number NCD980841951	2. Page 1 of 1	3. Emergency Response Phone No. 828-464-0352	4. Manifest Tracking Number 001992371 FLE
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5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burns Road Newton, NC 28658 Generator's Phone: 828-464-0352	Generator's Site Address (if different than mailing address)
--	--

6. Transporter 1 Company Name Envirite of Pennsylvania, Inc.	U.S. EPA ID Number PAD010154045
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7. Reporter 2 Company Name	U.S. EPA ID Number
----------------------------	--------------------

8. Designated Facility Name and Site Address Envirite of Pennsylvania, Inc. 730 Vogelsong Road York, PA 17404 Facility's Phone: 800-878-1618	U.S. EPA ID Number PAD010154045
--	------------------------------------

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes		
		No.	Type					
X	1. RQ, Hazardous waste, liquid, n.o.s., 9, NA3082, PG III (D005)	003	DM	165	G	D005		
X	2. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	008	DM	6400	A	D005		
X	3. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	1	DM	100	P	D005		
	4.							

14. Special Handling Instructions and Additional Information 1. EW Approval # 16342 File Ref. # 14853 ERG 171 2. EW Approval # 16343 File Ref. # 10827 ERG 171 3. EW Approval # 16344 File Ref. # 10828 ERG 171	Box # Trailer # 8003
--	-------------------------

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/packaged, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and if in the Party of 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 Shannon Leil	Signature <i>[Signature]</i>	Month Day Year 7/17/09
--	---------------------------------	---------------------------

16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.	Port of origin Date leaving U.S.
--	-------------------------------------

17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name JAMES E. MILLER, JR.	Signature <i>[Signature]</i>	Month Day Year 04/01/07
Transporter 2 Printed/Typed Name	Signature	Month Day Year

18. Discrepancy 18a. Discrepancy Location Space 3195 # 4AUB 123 #	Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection
---	---

18b. Alternate Facility (or Generator) Facility's Phone:	Manifest Reference Number	U.S. EPA ID Number
18c. Signature of Alternate Facility (or Generator)	Month Day Year	

19. Hazardous Waste Report Management Method Codes (2-4 on file for hazardous waste treatment, storage, and recycling systems)	1. H111	2. H111	3. H111	4.
--	---------	---------	---------	----

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18a Printed/Typed Name KIRBY E NEWBORN	Signature <i>[Signature]</i>	Month Day Year 10/1/09
--	---------------------------------	---------------------------

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>NA000011001</b>		2. Page 1 of <b>1</b>		3. Emergency Response Phone <b>678-234-5678</b>		4. Manifest Tracking Number <b>001590611 FLE</b>				
		5. Generator's Name and Mailing Address <b>Special Metals Welding Products 1401 Burns Road Newton, NC 28659 Generator's Phone: 704-385-0000</b>						Generator's Site Address (if different than mailing address) <b>ref 00246</b>				
		6. Transporter 1 Company Name <b>Enviro of Ohio, Inc.</b>						U.S. EPA ID Number				
		7. Transporter 2 Company Name						U.S. EPA ID Number				
		8. Designated Facility Name and Site Address <b>Enviro of Ohio, Inc. 2050 Central Avenue, SE Canton, OH 44707 Facility's Phone: 330-745-0000</b>						U.S. EPA ID Number <b>OH0360568007</b>				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
						No.	Type					
	1.	RD. Hazardous waste, solid, n.o.s. (1005), 9, HA3077, PG 3				5	DM	3275	P	1005		
	X	RD. Hazardous waste, liquid, n.o.s. (Batteries), 9, HA3082, PG 3				6	DM	5883	P	1005		
	Y	RD. Hazardous waste, solid, n.o.s. (1005), 9, HA3077, PG 3				45	DM	22.45	P	1005		
	4.											
14. Special Handling Instructions and Additional Information <b>A. EW Approval # 10926 File Ref. # CS6809 ERG 171 B. EW Approval # 10788 File Ref. # CS5574 ERG 171 C. EW Approval # 10927 File Ref. # CS6810 ERG 171</b>												
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 <b>ALAN JONES</b>						Signature <i>Alan Jones</i>		Month Day Year <b>10 11 08</b>				
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> 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 <b>Steve P. ...</b>						Signature <i>Steve P. ...</i>		Month Day Year <b>10 11 08</b>				
Transporter 2 Printed/Typed Name						Signature		Month Day Year				
18. Discrepancy												
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection												
Manifest Reference Number: _____												
18b. Alternate Facility (or Generator) U.S. EPA ID Number												
Facility's Phone: _____												
18c. Signature of Alternate Facility (or Generator) Month Day Year												
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. _____			2. _____			3. _____			4. _____			
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 Day Year				

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number <b>001501811 FILE</b>		
5. Generator's Name and Mailing Address				Generator's Site Address (if different than mailing address)			
Generator's Phone:				<b>ref 00246</b>			
6. Transporter 1 Company Name				U.S. EPA ID Number			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address				U.S. EPA ID Number			
Facility's Phone:							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes	
		No.	Type				
1.				3275	F		
2.				2003	F		
3.				2003	F		
4.							
14. Special Handling Instructions and Additional Information							
15. GENERATOR/SOFFEROR'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/Offoror's Printed/Typed Name				Signature	Month	Day	Year
					09	11	05
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name				Signature	Month	Day	Year
Steve Fisher					09	11	05
Transporter 2 Printed/Typed Name				Signature	Month	Day	Year
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
18b. Alternate Facility (or Generator)				Manifest Reference Number: _____ U.S. EPA ID Number _____			
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)				Month	Day	Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.	2.	3.	4.				
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	Day	Year

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>WV20041051</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>870 404 1350</b>	4. Manifest Tracking Number <b>001591960 FLE</b>	
5. Generator's Name and Mailing Address <b>Special Metals Working Products 1401 Burris Road Newton, MA 02458</b> Generator's Phone: <b>978 455 0229</b>				Generator's Site Address (if different than mailing address)		
6. Transporter 1 Company Name <b>Enviro of Ohio, Inc.</b>				U.S. EPA ID Number		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address <b>Enviro of Ohio, Inc. 2050 Central Avenue, SE Canton, OH 44707</b> Facility's Phone: <b>609 715 5505</b>				U.S. EPA ID Number <b>01-096056389</b>		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
X	1. <b>RD, Hazardous waste, solid, non (D005) 9, HA3072, PG III</b>	5	DRM	2275	P	D005
X	2. <b>RD, Hazardous waste, liquid, non (D005) 9, HA3082, PG III</b>	6	DRM	5883	P	D005
X	3. <b>RD, Hazardous waste, solid, non (D005) 9, HA3077, PG III</b>	4	DRM	2245	P	D005
	4.					
14. Special Handling Instructions and Additional Information <b>A. EW Approval # 10828 File Ref. # CS5809 ERG 171 B. EW Approval # 10786 File Ref. # CS5574 ERG 171 C. EW Approval # 10827 File Ref. # CS5810 ERG 171</b>						
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 Day Year <b>03/11/05</b>
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name <b>Steve P. Picher</b>				Signature		Month Day Year <b>10/11/02</b>
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)						Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		4.
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 Day Year

GENERATOR

INTL

TRANSPORTER

DESIGNATED FACILITY

ATTN:

WILLIE LOGAN

PLEASE SIGN THE NEW MANIFEST AND  
RETURN TO MY ATTENTION. CALL IF YOU HAVE ANY  
QUESTIONS

THANK YOU

JOHN McDONALD

1-800-858-9423

P.S. ALSO KEEP BOTTOM COPY FOR YOUR RECORDS.

Steve,

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 -

1. The Envirote 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.
2. When the truck arrived at Envirote, 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.
3. Alan Jones left the company on the morning of 9/15.
4. Envirote provided a copy of the signed manifest (1591960) to us in Newton.

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, [www.specialmetals.com](http://www.specialmetals.com)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>AC2500041051</b>	2. Page 1 of	3. Emergency Response Phone <b>614-444-1000</b>	4. Manifest Tracking Number <b>001590611 FLE</b>		
		5. Generator's Name and Mailing Address <b>Special Metals Welding Products 1401 Burris Road Newark, OH 43055</b>		Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name <b>Division of Ohio, Inc.</b>					U.S. EPA ID Number		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address <b>Division of Ohio, Inc. 2050 Central Avenue, SE Canton, OH 44707</b>					U.S. EPA ID Number <b>OH000060002</b>		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. <b>Oil, Hazardous waste, solid, n.o.s. (1705), 9, HA3077, PG B</b>	5	DM	3275	P	1705
	X	2. <b>Oil, Hazardous waste, liquid, n.o.s. (1705), 9, HA3077, PG B</b>	6	DM	5883	P	1705
	X	3. <b>Oil, Hazardous waste, solid, n.o.s. (1705), 9, HA3077, PG B</b>	4.5	DM	2,245	P	1705
		4.					
14. Special Handling Instructions and Additional Information <b>A. EW Approval # 10826 File Ref. # CS6800 ERG 171 B. EW Approval # 10788 File Ref. # CS5574 ERG 171 C. EW Approval # 10827 File Ref. # CS6810 ERG 171</b>							
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 <b>ALAN JONES</b>		Signature <i>Alan Jones</i>			Month	Day	Year
					<b>10</b>	<b>11</b>	<b>08</b>
TRANSPORTER INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/text: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: <b>Steve Pipher</b> Signature: <i>Steve Pipher</i> Month: <b>10</b> Day: <b>11</b> Year: <b>08</b>						
	Transporter 2 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____						
GENERATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____						
	18c. Signature of Alternate Facility (or Generator) _____ Month: _____ Day: _____ Year: _____						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. _____		2. _____		3. _____		4. _____	
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	Day	Year

ATTN:

Willie Logan

PLEASE SIGN THE NEW MANIFEST AND  
RETURN TO MY ATTENTION. CALL IF YOU HAVE ANY  
QUESTIONS

THANK YOU

John McDONALD

1-800-858-9123

PS. Also keep bottom copy for your records.



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <i>NYC0041031</i>	2. Page 1 of 1	3. Emergency Response Phone <i>870 404 3212</i>	4. Manifest Tracking Number <b>001591960 FILE</b>			
5. Generator's Name and Mailing Address <b>Special Metals Welding Products 1901 Morris Road Newton, NC 28658 Generator's Phone: 252 465 0251</b>					Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name <b>Enviro of Ohio, Inc.</b>					U.S. EPA ID Number			
7. Transporter 2 Company Name					U.S. EPA ID Number			
8. Designated Facility Name and Site Address <b>Enviro of Ohio, Inc. 2050 Central Avenue, SE Canton, OH 44707 Facility's Phone: 330 715 6802</b>					U.S. EPA ID Number <b>OH8700568892</b>			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Vol.	13. Waste Codes		
		No.	Type					
X	1. (RQ) Hazardous waste, solid, non (1005), H, NA3077, PG II	5	DX	2275	P	1005		
X	2. (RQ) Hazardous waste, liquid, non (1005), D, NA3077, PG II	6	DX	5683	P	1005		
X	3. (RQ) Hazardous waste, solid, non (1005), D, NA3077, PG II	4	DM	2245	P	1005		
	4.							
14. Special Handling Instructions and Additional Information A. EW Approval # 10828 File Ref. # CS5809 ERG 171 B. EW Approval # 10785 File Ref. # CS5574 ERG 171 C. EW Approval # 10827 File Ref. # CS5810 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 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 <i>Bill...</i>					Signature <i>[Signature]</i>		Month Day Year <i>12/11/08</i>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name <i>Steve Pichner</i> Signature <i>[Signature]</i> Month Day Year <i>10/9/11/08</i> Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____								
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____								
18b. Alternate Facility (or Generator) Facility's Phone: _____					U.S. EPA ID Number			
18c. Signature of Alternate Facility (or Generator)							Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
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 Day Year _____								

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>NCD980841951</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>828-464-0352</b>	4. Manifest Tracking Number <b>001591960 FLE</b>	
5. Generator's Name and Mailing Address <b>Special Metals Welding Products 1401 Burns Road New ton, NC 28658 Generator's Phone: 828-465-0352</b>				Generator's Site Address (if different than mailing address)		
6. Transporter 1 Company Name <b>Enviro of Ohio, Inc.</b>				U.S. EPA ID Number <b>OH D980568992</b>		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address <b>Enviro of Ohio, Inc. 2050 Central Avenue, SE Canton, OH 44707 Facility's Phone: 800-715-5805</b>				U.S. EPA ID Number <b>OH D980568992</b>		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
X	1. <b>RQ, Hazardous waste, solid, n.o.s. (D005), 9, NA3077, PG III</b>	5	DM	3275	P	D005
X	2. <b>RQ, Hazardous waste, liquid, n.o.s. (Barium), 8, NA3082, PG III</b>	6	DM	5883	P	D005
X	3. <b>RQ, Hazardous waste, solid, n.o.s. (D005), 9, NA3077, PG III</b>	4	DM	2245	P	D005
	4.					
14. Special Handling Instructions and Additional Information <b>A. EW Approval # 10828 File Ref. # CS6809 ERG 171 B. EW Approval # 10786 File Ref. # CS5574 ERG 171 C. EW Approval # 10827 File Ref. # CS6810 ERG 171</b>						
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 Signature <i>William Logan</i>		Signature <i>[Signature]</i>		Date <b>09/11/08</b>		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name <b>Steve Pipher</b>		Signature <i>[Signature]</i>		Month Day Year <b>10/11/08</b>		
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a: Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. <b>H111</b>		2.		3.		4.
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 <b>DAVE WEBSTER</b>		Signature <i>[Signature]</i>		Month Day Year <b>10/15/08</b>		

**Special Metals Products (SMP)**

Barron, Steve

Sent: Tuesday, June 09, 2009 6:00 PM

To: durn, Brent

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  
 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.  
 .....

To BB

1/1 - Final Report Final 9/5/09 ✓

2/1 - Photos jpeg

BB to MLW

3/1 - ~~cover sheet~~ Cover Sheet \_\_\_\_\_

4/1 - ~~cover sheet~~ <sup>RECIS</sup> Cover Sheet

5/1 - Check list signed by ~~the~~ SMP

6/1 - Attach I 7 ~~at~~ cover sheets

7/1 - Cost work sheet. ~~word~~ <sup>word</sup> / ~~Excel~~ <sup>Excel</sup>

8/1 - Copies from ~~the~~ SMP

9/1 - Review data & Sec State info

10/1 - Older Reporting

12/5 - Violation History

**Waste Streams:**

	<b>TYPE WASTE</b>	<b>COMMON NAME</b>	<b>WASTE CODE</b>
1			
2			
3			
4			
5			

**TSD Facilities:**

	<b>FACILITY NAME</b>	<b>EPA ID #</b>
1		
2		
3		
4		
5		

**Transporters:**

	<b>TRANSPORTER NAME</b>	<b>EPA ID #</b>
1		
2		
3		
4		
5		

**Manifest Weights of Hazardous Waste Shipments**

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- Use Report w/ photos  
- Photos neg

+ Cover sheet,

- Hazard Compliance Data form Side A

Attachment I

- Inspection Report  
- Checklist  
- Photos

Attachment II

+ Violation History

Att. III

Penalty Summary worksheets =

Investigative Costs

- Cost Worksheet  
SB  
SM

104  
82  
186  
move to Newbur 52 x 2  
SM move to Newbur 41 x 2

Order Review



Division of Waste Management



LQG INSPECTION CHECKLIST

FACILITY NAME: \_\_\_\_\_ Date \_\_\_\_/\_\_\_\_/\_\_\_\_ Time \_\_\_\_  
 SITE ADDRESS: \_\_\_\_\_ (Verified in RCRAInfo? Y/N)  
 MAILING ADDRESS: \_\_\_\_\_  
 EPA ID #: NC \_\_\_\_\_  
 SITE CONTACT: \_\_\_\_\_ TITLE: \_\_\_\_\_  
 PHONE NUMBER: \_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_ ext. \_\_\_\_\_  
 INSPECTOR: \_\_\_\_\_  
 PARTICIPANTS: \_\_\_\_\_

Generator Status: \_\_\_\_\_ Determined By: a. Statement from: \_\_\_\_\_  
 b. Manifests: \_\_\_\_\_  
 c. Waste Stored On-site (amount): \_\_\_\_\_

\*NOTE: This document is for assistance only. For complete regulations refer to Title 40 of the Federal Code of Regulations Part 260-279.  
 This form does not contain all NC Hazardous Waste Regulations. Division website located at: <http://www.wastenotnc.org/>

**Check Manifest to determine the category of generator**

\_\_\_\_ CESQG < 220# (1/2 drum) month, 2,200# Max (5 1/2 drums)  
 \_\_\_\_ SQG >220# (1/2 drum) month <2200 # (5 1/2 drums) Max 13,200# (33 drums)  
 \_\_\_\_ LQG >2200# (5 1/2 drums) month

Facility Description/Processes/# Employees: \_\_\_\_\_  
 Number of Building \_\_\_\_\_  
 Wastes Generated \_\_\_\_\_  
 Nearest Residence \_\_\_\_\_ POTW Sewer or Septic \_\_\_\_\_ City Water \_\_\_\_\_  
 \_\_\_\_\_ NPDES? \_\_\_\_\_

**Facility Description:**

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

# RCRA Site Detail

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

## NCD980841951 SPECIAL METALS WELDING PRODUCTS

EPA Region 04 Extract Flag: N Facility Identifier: County: CATAWBA

Universes Generator: LQG Transporter: N Active: Y  
 Operating TSD: --- IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: NC Source Type: Other - B Seq. Number: 2 Receive Date: 26 APR 2006 Report Cycle: 2005

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658-1754

Mailing Address: 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658-1754  
 UNITED STATES

Contact Person ALAN E. JONES UNITED STATES  
 For Source (828) 465-0352 ext. 211  
 Information AJONES@SMWPC.COM

Owner (current) 3200 RIVERSIDE DRIVE Type: Private  
 HUNTINGTON ALLOYS HUNTINGTON, WV 25706  
 From: 11/26/2003 To: HUNTINGTON Phone:

Operator (current) 1401 BURRIS ROAD Type: Private  
 SPECIAL METALS WELDING PRODUCTS NEWTON, NC 28658-1754  
 From: 11/26/2003 To: NEWTON Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:  
 Accessibility: No. Employees: State District:

NAICS Codes: 331491 Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding

Notes: NC

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: NC-4 NC - STATE REGULATED

Transfer Facility:

### Used Oil Activities

Other Hazardous Waste Generator Activities	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity: No	Transporter: No	Used Oil Fuel Marketer Activity	
Mixed Waste Generator: No	Transfer Facility: No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Transporter Activity: No	Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	No
TSD Activity: No	Processor: No		
Recycler Activity: No	Refiner: No		
Exempt Boiler and/or Industrial Furnace	Underground Injection Control: No	Destination Facility for Universal Waste:	No
Small Quantity Onsite Burner Exemption: No			
Smelting, melting, Refining Furnace Exemption: No			

### Universal Waste Activities:

Description	Generated	Accumulated/Managed
Batteries	N	N
Lamps	N	N
Pesticides	N	N
Mercury containing equipment	N	N

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D005

### Biennial Report Information

No Biennial Report detail information available.

Activity Location: NC Source Type: Other - B Seq. Number: 1 Receive Date: 26 MAR 2004 Report Cycle: 2003

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658

Mailing Address: 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658  
 UNITED STATES





**Elaine F. Marshall**  
Secretary

North Carolina

**DEPARTMENT OF THE SECRETARY OF STATE**

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

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Date: 4/15/2008

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**Corporation Names**

Name	Name Type
<b>NC</b> Huntington Alloys Corporation	Legal
<b>NC</b> Inco Alloys International, Inc.	Prev Legal

**Business Corporation Information**

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

**Registered Agent**

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

**Stock**

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](#).

Company Name: Greenland  
EPA ID Number: \_\_\_\_\_  
Date: 13 May 03

Facility was designated  
as a Large  
Quantity Generator  
72,200 #/month

Required Records/Document Checklist Large

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. *SP*
- 3. Records of weekly inspection of silt pads (and after storms). *SO*
- ✓ 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. *MISSING SOME*
- ✓ 6. Written description of type and amount of introductory and continuing training that will be given to each hazardous waste management position.
- ✓ 7. Records of annual or introductory hazardous waste training for each employee managing hazardous waste. *MISSING SOME*
- ✓ 8. Copies of signed hazardous waste manifests. *MISSING SOME*
- ✓ 9. Copy of land ban notification for each hazardous waste transported from facility.
- ✓ 10. Copy of latest facility contingency plan. *NOTE UPDATES (A-JONES)*
- ✓ 11. Copy of Biennial Report.
- ✓ 12. Copy of written, description or other type of Waste Minimization Plan.

I understand or certify that the noted records/documents were requested and that all records currently available and such portions of these records were made available at the time of the inspection.

Signature: AK [Signature]  
Facility Contact or Representative

Inspection Date

7922 697E T000 0E30 2002 7002

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Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 6.75</b>	<b>05/23/2008</b>

Sent To: DALE COFFEY - City of Newton  
 Street, Apt. No., or PO Box No. 116 "A" Street  
 City, State, ZIP+4 Newton, NC, 28658

PS Form 3800, June 2002 See Reverse for Instructions

7922 697E T000 0E30 2002 7002

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Return Receipt Fee (Endorsement Required)	\$ 2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 6.75</b>	<b>05/23/2008</b>

Sent To: James Rumley - City of Newton  
 Street, Apt. No., or PO Box No. P.O. Box 550  
 City, State, ZIP+4 Newton, NC 28658

PS Form 3800, June 2002 See Reverse for Instructions

7922 697E T000 0E30 2002 7002

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Certified Fee	\$ 2.70	11
Return Receipt Fee (Endorsement Required)	\$ 2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 6.75</b>	<b>05/23/2008</b>

Sent To: David Weldon - Catawba County  
 Street, Apt. No., or PO Box No. P.O. Box 389  
 City, State, ZIP+4 Newton, NC 28658

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**OFFICIAL USE**

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Certified Fee	\$ 2.70	11
Return Receipt Fee (Endorsement Required)	\$ 2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 6.75</b>	<b>05/23/2008</b>

Sent To: Dale Greer - Catawba Memorial  
 Street, Apt. No., or PO Box No. 810 Fairgrave Church Road  
 City, State, ZIP+4 Hickory, NC 28602

PS Form 3800, June 2002 See Reverse for Instructions

7922 697E T000 0E30 2002 7002

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**OFFICIAL USE**

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Certified Fee	\$ 2.70	11
Return Receipt Fee (Endorsement Required)	\$ 2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 6.75</b>	<b>05/23/2008</b>

Sent To: Donald Brown - City of Newton  
 Street, Apt. No., or PO Box No. P.O. Box 550

7922 697E T000 0E30 2002 7002

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LENOIR, NC 28645  
**OFFICIAL USE**

Postage	\$ 1.85	0613
Certified Fee	\$ 2.70	11
Return Receipt Fee (Endorsement Required)	\$ 2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 6.75</b>	<b>05/23/2008</b>

Sent To: Gary Sparts - STAT, Inc.  
 Street, Apt. No., or PO Box No. P.O. Box 1443

7002 2030 0001 3189 7661

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For delivery information visit our website at [www.usps.com](http://www.usps.com)

MOORESVILLE, NC 28115  
**OFFICIAL USE**

Postage	\$ 1.85	0613
Certified Fee	\$2.70	11
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 46.75</b>	05/23/2008

Sent to  
 Stephen Barron - NCDENR - Haz Waste  
 Street Apt. No. or PO Box No. 610 East Center Avenue  
 City, State, ZIP+4 MOORESVILLE, NC 28115



7002 2030 0001 3189 7786  
7002 2030 0001 3189 7786

**SENDER: COMPLETE**

- Complete items 1, 2 and item 4 if Restricted
- Print your name and address so that we can return it to you or on the front if space permits
- Attach this card to the back of the envelope or on the front if space permits

1. Article Addressed to:  
 Mr. Dale Coffey  
 City of Newton  
 116 "A" Street  
 Newton, NC

2. Article Number  
 (Transfer from service label)  
 PS Form 3811, February 2002

PS Form 3800, June 2002  
 City, State, ZIP+4<sup>®</sup>  
 Newton, NC 28658  
 Street, Apt. No., P.O. Box No.  
 116 "A" Street  
 Dale Coffey - City of Newton

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

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**DELIVERY**

- Agent
- Addressee

C. Date of Delivery

- Item 1?  Yes
- Item 2?  No

Mail Receipt for Merchandise

- Yes

86

102535-02-M-1540



**Welding Products Company**  
 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 28658

INCONEL<sup>®</sup>, MONEL<sup>®</sup>, NI-ROD<sup>®</sup>, INCOLOY<sup>®</sup>, NIMONIC<sup>®</sup>, INCO-WELD<sup>®</sup>, INCOFLUX<sup>®</sup>, NILO<sup>®</sup>



7002 2030 0001 3189 7798  
7002 2030 0001 3189 7798

**SENDER: COMPLETE THIS**

- Complete items 1, 2, and item 4 if Restricted Delivery
- Print your name and address so that we can return the
- Attach this card to the back or on the front if space permits

1. Article Addressed to:  
DAVID WELDON  
CATAWBA COUNTY  
EMERGENCY SERVICES  
P.O. BOX 389  
NEWTON, NC

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2002

PS Form 3811, February 2002  
City, State, Zip, or P.O. Box No.  
Newton, NC 28658  
See Features for Instructions

Sent to  
David Weldon - Catawba County  
Street, Apt. No., or P.O. Box No.  
P.O. Box 389

Total Postage & Fees	\$
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Postmark Here	

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Agent  
 Addressee

Date of Delivery

Yes  
 No

for Merchandise

Yes

102505-02-M-1540

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

MR. DAVID WELDON  
CATAWBA COUNTY EMERGENCY SVCS.  
P.O. BOX 389  
NEWTON, NC 28658

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7002 2030 0001 3189 7809  
7002 2030 0001 3189 7809

**SENDER: COMPLETE THIS**

- Complete items 1, 2, and 3, item 4 if Restricted Delivery
- Print your name and address so that we can return the card or on the front if space permits
- Attach this card to the back of the envelope

1. Article Addressed to:

Donald Brown -  
City of Newton  
P.O. Box 550  
Newton, NC 28658

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2004

PS Form 3800, June 2002  
City, State, ZIP+4<sup>®</sup>  
Newton NC 28658  
See Reverse for Instructions

Sent To  
Street, Apt. No.,  
or PO Box No.  
Donald Brown - City of Newton  
P.O. Box 550  
Newton NC 28658

Postage	\$
Confined Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	

Postmark  
Here

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(Domestic Mail Only; No Insurance Coverage Provided)

Agent  
 Addressee  
Date of Delivery

Yes  
 No

Merchandise  
 Yes

2535-02-M-1540



**Welding Products Company**

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

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

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7002 2030 0001 3189 7816  
7002 2030 0001 3189 7816

**SENDER: COMPLETE THIS**

- Complete Items 1, 2, and Item 4 if Restricted Delivery
- Print your name and address so that we can return the package if it is undeliverable
- Attach this card to the back of the package or on the front if space permits

1. Article Addressed to:  
*James Rumley  
City of Newton  
Wastewater Treatment Plant  
P.O. Box 550  
Newton, NC*

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2002

PS Form 3800, June 2002

Sent to  
James Rumley - City of Newton  
P.O. Box 550  
Newton, NC 28658

City, State, ZIP+4<sup>®</sup>  
Newton, NC 28658

See Reverse for Instructions

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

**OFFICIAL USE**

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**U.S. Postal Service<sup>™</sup>**  
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Agent

Addressee

Date of Delivery

Yes  No

Yes  No

Product for Merchandise

Yes

102596-02-M-1540



**Welding Products Company**

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

*Mr. James Rumley  
City of Newton Wastewater Treatment Plant  
P.O. Box 550  
Newton, NC, 28658*

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7002 2030 0001 3189 7823  
7002 2030 0001 3189 7823

**SENDER: COMPLETE THIS SECTION**

- Completes Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the back so that we can return the card to you.
- Attach this card to the back of the mail or on the front if space permits.

1. Article Addressed to:

Dale Greer  
Catawba Memorial Hospital  
810 Fairgrove Church Road  
Hickory, NC 28602

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2004

PS Form 3800, June 2003

City, State, ZIP+4<sup>®</sup>  
Hickory, NC 28602

See Reverse for Instructions

Sent to Dale Greer - Catawba Memorial Hospital  
Street, Apt. No., or PO Box No. 810 Fairgrove Church Road  
City, State, ZIP+4<sup>®</sup> Hickory, NC 28602

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

**U.S. Postal Service<sup>®</sup>**  
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**OFFICIAL USE**

1540



**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

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7002 2030 0001 3189 7830  
7002 2030 0001 3189 7830

**SENDER: COMPLETE THIS SECTION**

PS Form 3811, June 2004

■ Complete items 1, 2, and 3. Attach item 4 if Restricted Delivery is required.  
 ■ Print your name and address so that we can return the card to you.  
 ■ Attach this card to the back of the envelope or on the front if space permits.

1. Article Addressed to:  
 Gary Sparts  
 STAT, Inc  
 P.O. Box 1443  
 Lenoir, NC 28645

2. Article Number  
 (Transfer from service label)

PS Form 3811, February 2004

Sent to: Gary Sparts - STAT, Inc.  
 Street, Apt. No., or P.O. Box No.: P.O. Box 1443  
 City, State, ZIP+4: Lenoir, NC 28645

Return Receipt Fee (Endorsement Required)  
 Restricted Delivery Fee (Endorsement Required)  
 Total Postage & Fees

Postage \$  
 Certified Fee \$  
 Restricted Delivery Fee \$  
 Total Postage & Fees \$

Postmark Here

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 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Agent Addressee of Delivery  
 Yes  
 No

Merchandise  
 Yes  
 No

93-02-M-1540



**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

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7002 2030 0001 3189 7861  
7002 2030 0001 3189 7861

**SENDER: COMPLETE**

- Complete items 1, 2, Item 4 if Restricted Delivery
- Print your name and so that we can return
- Attach this card to the back or on the front if space

1. Article Addressed to:

Stephen Barron  
NC DENR  
Hazard Waste Section  
610 East Center Avenue  
Mooresville, NC

2. Article Number

(Transfer from service label)

PS Form 3811, February 2002

PS Form 3800, June 2002

See Reverse for Instructions

City, State, ZIP+4<sup>®</sup>  
Mooresville, NC 28115  
Street Apt. No.  
610 East Center Avenue  
Stephen Barron - NC DENR - Hazard Waste

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

**OFFICIAL USE**

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**U.S. Postal Service<sup>®</sup>**  
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**DELIVERY**

- Agent
- Addressee

C. Date of Delivery

- Item 1?  Yes
- Item 2?  No

Receipt for Merchandise

- Yes

102395-02-M-1540



**Welding Products Company**

1401 Burrís Rd., Newton, North Carolina 28658

Welding Electrodes • Filler Metals • Flux-Cored Wires • Fluxes

Mr. Stephen Barron  
NC DENR - Hazard Waste Section  
610 East Center Avenue  
Mooresville, NC 28115

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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

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

Integrated Contingency Plan

*Rev.  
13 May 09  
50*

## 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

Tom Dickerson  
335 Holland Drive  
Statesville, NC 28677  
704-872-4292

3<sup>rd</sup> Alternate

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.

**SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

Outline for RCRA Training

**RCRA TRAINING ATTENDANCE ROSTER**

TRAINER: \_\_\_\_\_

DATE: ~~5-10-07~~

5/27/08

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 Rayfield	Chris Rayfield	Electrode
Devin Daniels	Devin Daniels	Electrode
Joshua M. Grindstaff	Joshua M. Grindstaff	Electrode
Joshua Farley	Joshua Farley	Electrode
R. L. CATOE	R. L. Catoe	Process
Willie Logan	Willie Logan	Production
Shane McSweeney	Shane McSweeney	Production
Shannon Lail	Shannon Lail	Electrode
Burt Propst	Burt Propst	Electrode

**SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

**Outline for RCRA Training**

**RCRA TRAINING ATTENDANCE ROSTER**

TRAINER: \_\_\_\_\_

DATE: ~~5-10-07~~  
5/27/08

**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
EARL M MOMPASA	<i>[Signature]</i>	TIG Operator
JENNIE MARTIN	<i>[Signature]</i>	Mgr. HR - Admin Service
Khai Yang	<i>[Signature]</i>	Maintenance
ROBERT LAWSON	<i>[Signature]</i>	MAINT

**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

~~Kenny Church~~

Terry Herman

~~Willie Gibson~~

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.**

5/28/2008



Outline for RCRA Training

## RCRA Training Test

Print Name: R. L. CATO Signature: R. L. Cato 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 ½ 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.
  - 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.
  - c. 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 or  False

Outline for RCRA Training

# RCRA Training Test

Print Name: Willie Logan Signature: [Signature] 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 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.
  - 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.
  - c. 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 or  False



### Evaluation List



**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](#)

25 Evaluation(s) found.

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	<a href="#">Show Violations</a>
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	<a href="#">Show Violations</a>
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	<a href="#">Show Violations</a>
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	<a href="#">Show Violations</a>
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	<a href="#">Show Violations</a>
15	NC	008	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	<a href="#">Show Violations</a>
20	NC	006	CEI	09/18/1990	S		COMPLIANCE EVALUATION INSPECTION ON-SITE	1	<a href="#">Show Violations</a>
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.

262, 34 (a) (4)

EPA ID Number: NCD 980 841 951

Facility Name: Special Metals Welding Products

City: Newton

k

Mo./Day/Yr. Type:CEI/CSE/

Date: 5/13/2009

CEI

Date:

Inspector ID #: 031

Reason: 01

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 # \_\_\_\_\_

or

- no longer a SNC (SNN eval.)

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site Wells	Distance to Off-site wells

# 1 Type: GPT

Date Determined : 5/13/2009

Class: \_\_

Priority: \_\_ Branch: 01

Person: 031

Return to Compliance

\*Scheduled\*

\*Actual\*

Reg. Type: SR

Reg. Description: 40 CFR 262.34(a) (1) (i)

Comment:

#2 Type: GFI Date Determined: 5/13/2009 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: I Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

Reg. Type: SR

Reg. Description: 40 CFR 262.34(a) (1) (i) 40 CFR 265.173

#3 Type: GFI Date Determined: 5/13/2009 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: I Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

Reg. Type: SR

40 CFR 262.34(a) (4)

#4 Type: GFI Date Determined: 5/13/2009 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: I Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

Reg. Type: SR

40 CFR 262.34 (a) (4) 40 CFR 265.16 (d)(2)

#5 Type: GFI Date Determined: 5/13/2009 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: I Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

Reg. Type: SR

40 CFR 262.34 (a) (4) 40 CFR 265.31

Comment:

#6 Type: GPT Date Determined: 5/13/2009 Class: \_\_

Priority: \_\_ Branch: i Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

Reg. Type: SR

Reg. Description:

Comment:

40 CFR 262.34 (a) (4)

40 CFR 265.35

15A NCAC 13A .0110(c)

---

#7 Type: GPT Date Determined: 5/13/2009 Class: \_\_

Priority: \_\_ Branch: i Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

Reg. Type: SR

Reg. Description:

Comment:

40 CFR 262.34 (a) (4)

40 CFR 265.54 (d)

---

#8 Type: GPT Date Determined: 5/13/2009 Class: \_\_

Priority: \_\_ Branch: i Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

Reg. Type: SR

Reg. Description:

40 CFR 262.34 (c) (1)

---

#9 Type: GPT Date Determined: 5/13/2009 Class: \_\_

Priority: \_\_ Branch: i Person: 031

Return to Compliance:

\*Scheduled\*

\*Actual\*

FORM TYPE: 22

FORM LOCATION:

40 CFR 262.42 (a) (2)

Comment:

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# VIOLATION HISTORY

VIOLATION HISTORY PRINTING PARAMETERS  
NCD 980 841 951

<u>Inspection Date</u>	<u>Type of Inspection</u>	<u>NOV Issue Date/#</u>	<u>Violations</u>
07/10/2007	COMPLIANCE EVALUATION INSPECTION		
			<b>Regulations Violated:</b>
		1	40 CFR 262.34(a) (1) (i)
		2	40 CFR 262.34(a) (1) (i) 40 CFR 265.173
		3	40 CFR 262.34(a) (1) (i) 40 CFR 265.16(c)
		4	40 CFR 262.34 (a) (1) (i) 40 CFR 265.16 (d)(2)
		5	40 CFR 262.34 (a) (4) 40 CFR 265.31
		6	40 CFR 262.34 (a) (4) 40 CFR 265.35 15A NCAC 13A .0110(c)
		7	40 CFR 262.34 (a) (1) (i) 40 CFR 265.34 (d)
		8	40 CFR 262.34 (c) (1)
		9	40 CFR 262.42 (a) (2)



**VIOLATION HISTORY**

**NCD 980 841 951**

Inspection Date	Type of Inspection	NOA Issue #/NOA	Violations
5/27/2008	Compliance Scheduled Inspection		No Violations
1/21/2008	Compliance Evaluation Inspection	1-40 CFR 265.37 Fail to make arrangements with local authorities	No Violations
5/02/2006	Compliance Scheduled Inspection		No Violations
4/12/2006	Compliance Evaluation Inspection	1-40 CFR 262.334 (a) (4)?????? TNOV # ????????	No Violations
4/16/2004	Compliance Evaluation Inspection		No Violations



# Violation List




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												Go To								
		▲	▲	▲																
			<a href="#">265.C</a>															<a href="#">Show Evaluations</a>	<a href="#">Show Enforcements</a>	
			<a href="#">262.C</a>																<a href="#">Show Evaluations</a>	<a href="#">Show Enforcements</a>
			<a href="#">262.A</a>																<a href="#">Show Evaluations</a>	<a href="#">Show Enforcements</a>
			<a href="#">262.A</a>																<a href="#">Show Evaluations</a>	<a href="#">Show Enforcements</a>
			<a href="#">262.A</a>																<a href="#">Show Evaluations</a>	<a href="#">Show Enforcements</a>
			<a href="#">262.A</a>																<a href="#">Show Evaluations</a>	<a href="#">Show Enforcements</a>
			<a href="#">262.A</a>																<a href="#">Show Evaluations</a>	<a href="#">Show Enforcements</a>



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

*TO AB 28 May 09*  
DRAFT #5 28MAY09

**HAZARDOUS WASTE SECTION**

**FACILITY INSPECTION REPORT**

May 28, 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. **Survey Participants:** 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.

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Special Metals Waste Generations Calculations						
Waste shipments D005 Barium Drummed Hazardous Waste						
4/7/2009	Shipped		12 Drums	8,585 lbs.	or 715 # / Drum	
5/13/2009	In Inventory During RCRA Inspection					
	<90 Storage area		5 Drums	3,575 lbs.	@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 Satellite Accumulation Drums			100 lbs.	estimate	
	In Facility					
	Plus Waste D005 in Sludge Pit			2,500 lbs.	per month based on last year's annual waste generated amount. ( Pit 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:

- Manifests
  - 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.
  - Transporter: Envirite of Ohio OHD 980 568 992
  - TSD: Envirite of Ohio OHD 980 568 992

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- Weekly Inspections
  - Weekly inspections documents were reviewed.
  - 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.**
  - **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.
  - 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.
  
- Contingency Plan
  - 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

- 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.**
- 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 were 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.
- 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.**
- 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 were present during the inspection.
- Subpart BB/CC/J
  - 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

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Phone: 704-663-1699 \ FAX: 704-663-6040



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:

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 there 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 were 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.**

Company Name: Special Medical  
EPA ID Number: \_\_\_\_\_  
Date: 13 May 09

- Facility was inspected  
as a large  
Quantity Generator  
72,200 #/month.

**Required Records/Document Checklist** *Large*

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. *SP*
- 3. Records of weekly inspection of drip pads (and after storms). *SO*
- ✓ 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. *MISSING SOME.*
- ✓ 6. Written description of type and amount of introductory and continuing training that will be given to each hazardous waste management position.
- ✓ 7. Records of annual or introductory hazardous waste training for each employee managing hazardous waste. *MISSING SOME.*
- ✓ 8. Copies of signed hazardous waste manifests. *MISSING SOME.*
- ✓ 9. Copy of land ban notification for each hazardous waste transported from facility.
- ✓ 10. Copy of latest facility contingency plan. *NOTE UPDATED (A. JONES)*
- ✓ 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: A. L. [Signature] 5/13/09  
Facility Contact or Representative

Inspection Date



Date	TSD GPA#	Ship GPA#	Drum Qty/ #	Waste Code
------	-------------	--------------	----------------	------------

7/2/08

ENVIRTE OF PA	ENVIRTE OF PA	1 DRUM	SOP
PAD 010 154 045	" "		

1

2

3

4

40 BB 28 May



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

**DRAFT #4 28MAY09**

**HAZARDOUS WASTE SECTION**  
**FACILITY INSPECTION REPORT**

May 28, 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. **Survey Participants:** 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 Calculations					
Waste shipments D005 Barium Drummed Hazardous Waste					
4/7/2009	Shipped	12 Drums	8,585 lbs.	or 715 #/Drum	
5/13/2009	In Inventory During RCRA Inspection <90 Storage area	5 Drums	3,575 lbs.	@715 #/Drum	
	Plus Baghouse Drums Plus on the ground at the Baghouse	3 Drums	1074 lbs. 2 lbs.	@ est. 1/2 full or 358#/Drum estimate	
	Plus 6 Satellite Accumulation Drums In Facility		100 lbs.	estimate	
	Plus Waste D005 In Sludge Pit		2,500 lbs.	per month based on last year's annual waste generated amount. ( Pit 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:

- Manifests
  - 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.
  - Transporter: Envirite of Ohio OHD 980 568 992
  - TSD: Envirite of Ohio OHD 980 568 992

- Weekly Inspections
  - Weekly inspections documents were reviewed.
  - 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.
  - ADT completes monthly fire sprinkler inspections.
  - Fire extinguishers are checked monthly.
  - Key employees carry radios and/or cell phones.
  
- Contingency Plan
  - 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).**

- All emergency equipment is indicated in the plan.
- 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 # 8).**
  - 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 were 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.
  - 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).
- 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 were 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.**

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

**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.



PHOTO #4



PHOTO #5

Special Metals

- Baghouse #5 Satellite Accumulation Area
- Area not under the direct control of an operator.
- Container not closed.



PHOTO #6

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**Stephen H. Barron**  
**Environmental Senior Specialist**

---

**Date**

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

Winnipeg 1 → 262.425 (5) 107

Trinidad 2 → 265.16c (6) 110

JOB Dev. 3 → 265.16(d) (7) 110

Am. Calif. 4 → 265.54(d) (9) 110

~~Am. Calif.~~  
Missouri 5 → 265.31 (8) 110

DAT No. ✓ 6 → 262.34c (1) 265.173(a) 110  
Cumber

Not closed 7 → 262.34(a)(1) 265-173(a) 110

Airb. Spaw 8 → 262.34(a)(1) 110  
ISA NCR 1.3A

Westerly 9 → 262.34(a) + (3) 110

Asst 264.35

JAMIE KRITZER  
@ NCDENR, CO



**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.

--  
\*\*\*\*\*  
Correspondence to and from this address may be subject to the North  
Carolina Public Records Law and may be disclosed to third parties.  
\*\*\*\*\*

**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*

--

\*\*\*\*\*  
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](mailto: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. **DONE** Put the first three bullets under baghouse #6 also under #5. Under #5 put the container at #5 was not closed.....
4. **DONE** How 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.

--  
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 Carolina Public Records Law and may be disclosed to third parties.  
 \*\*\*\*\*



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 #3 27MAY09**  
**FACILITY INSPECTION REPORT**

May 27, 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. **Survey Participants:** 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 Calculations			
Waste shipments D005 Barium Drummed Hazardous Waste			
4/7/2009	Shipped	12 Drums	8,585 lbs. or 715 #/Drum
5/13/2009	In Inventory During RCRA Inspection #90 Storage area	5 Drums	3,575 lbs. @715 #/Drum
	Plus Baghouse Drums Plus on the ground at the Baghouse	3 Drums	1074 lbs. @ est. 1/2 full or 358#/Drum 2 lbs. estimate
	Plus 6 Satellite Accumulation Drums In Facility		100 lbs. estimate
	Plus Waste D005 In Sludge Pit		2,500 lbs. per month based on last year's annual waste generated amount. ( Pit 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:

- Manifests
  - 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.
  - Transporter: Envirite of Ohio OHD 980 568 992
  - TSD: Envirite of Ohio OHD 980 568 992

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- Weekly Inspections
  - Weekly inspections documents were reviewed.
  - 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.
  
- Contingency Plan
  - 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 # 4).**

- All emergency equipment is indicated in the plan.
- 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).**
  - 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.
  - It held 5 containers of D005 hazardous waste.

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- 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).**
- 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 were 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

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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:

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(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:

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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 were not under the control of an operator.**

**Special Metals must not have ~~more~~ 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.

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**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.



PHOTO #6



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**Stephen H. Barron**  
**Environmental Senior Specialist**

---

**Date**

**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.
- ✓ 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.....
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- 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...

Now what???????????????

Thanks.....S. Barron

.....  
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 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](mailto:Brent.Burch@ncmail.net)

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19 MAY 09

North Carolina Department of Environment and Natural Resources  
Division of Waste Management

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Governor

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. **Survey Participants:** 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.

7251

Special Metals Waste Generations Calculations				
Waste shipments D005 Barium Drummed Hazardous Waste				
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5/13/2009	In Inventory During RCRA Inspection			
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	Plus Baghouse Drums	3 Drums	1074 lbs.	@ est. 715 full or 176 #/Drum
	Plus on the ground at the Baghouse		2 lbs.	estimate
	Plus 6 Satellite Accumulation Drums in Facility		100 lbs.	estimate
	Plus Waste D005 in Sludge Pit		2,500 lbs.	per month based on last year's annual waste generated amount. (Pit is full with one year's waste)
		7251		
6,711 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. 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.

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  - There has not been a major emergency at this facility.
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  - 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.
  - 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).**

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- Evacuation routes were included.
- Biennial Report
  - The facility's last Biennial Report was submitted on 28MAR08
- Waste Minimization Plan
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- 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.
  - 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.**

**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).**
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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:

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

(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 there 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.



PHOTO #6

---

**Stephen H. Barron**  
**Environmental Senior Specialist**

---

**Date**

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



Parcel Report - Catawba County, NC

<b>Parcel Information:</b>	<b>Owner Information:</b>
Parcel ID: <a href="#">374008797592</a>	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 <a href="#">Deed Image</a>	City: HUNTINGTON
Subdivision:	State/Zip: WV 25705-1737
Lots:	
Block:	
Last Sale: \$123,500 on 5/1/1984	
Plat Book/Page: 19/153	<b>School Information:</b>
Calculated Acreage: 14.45	School District: NEWTON CONOVER
Tax Map: 059N 02015F	Elementary School: <a href="#">THORNTON</a>
State Road: 1746	Middle School: <a href="#">NEWTON CONOVER</a>
Township: NEWTON	High School: <a href="#">NEWTON CONOVER</a>
<b>Tax/Value Information:</b> <a href="#">Tax Rates(pdf)</a>	<b>Zoning Information:</b>
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
<a href="#">Current Tax Bill</a>	<a href="#">Zoning Agency Phone Numbers</a>
<b>Miscellaneous:</b>	
Voter Precinct: <a href="#">P22</a>	Firm Panel Date: 9/5/2007
Building Code: COMMERCIAL or INDUSTRIAL	Firm Panel #:
<a href="#">Building Permits</a> for this parcel	2010 Census Tract: 011300
WaterShed:	2010 Census Block: 2005
WaterShed Split:	
<a href="#">Parcel Report Data Descriptions</a>	

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# GEOSPATIAL INFORMATION SERVICES

CATAWBA COUNTY, NC

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clear selection

full map

### Search by

Parcel Id

Owner

Owner Name  
(any portion)

Address

Street Name  
(any portion)

Business Name/  
Landmark

LRK/REID

Subdivision

Plat Book/Page



Set the Map

### Map Layer

visible

- Parcels
- Parcel Annotation
- Misc. Lines
- Structures
- Contour Li
- Soils
- Townships
- Water Feat
- Tiles
- Flood Zone
- Aerial 200:
- Aerial 200:
- Cities
- North Arro
- Scale Bar

Legend

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[Print the Parcel Report](#)
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[List all Owners](#)
[Deed History Report](#)

Subject: Re: [Fwd: Re: Draft #1 Special Metal Facility Report]
From: Brent Burch <Brent.Burch@ncmail.net>
Date: Tue, 19 May 2009 09:36:47 -0400
To: Steve Barron <Steve.Barron@ncmail.net>
CC: Sean Morris <sean.morris@ncmail.net>

5000 LBS M A
Sgt 08 left Excess 7 month
Alum Jones still listed as 13 May 09 Ref. Envr. Energy CO Ordinance

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?

Steve Barron wrote:

BB

April 7 09 glir
12 Drum 8585 at 4-7-09 4650x 9005 1485
or 715 # drum. 8-6200 8 0005
1-700 0005

Sean's comments are attached..

I will include in Draft #2, which would also have any of your comments..

Thanks.....S. Barron

@ incertum 5/13/09
905 Str 5 Drum 715 # = 3575
12-8585 #
715 #/15 Aug

Correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

Plus 3 Potw Drums at Snt. Accu.

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>
To: Steve Barron <Steve.Barron@ncmail.net>

Plus Sludge Generation at POTW Tank: 5/13/09
5 Drums
x 715 = 75
at hybrid Potw + 3 Drums at Bayhous 31

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.

x 715 = 2145 = 536 out

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 possibility 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 facility, 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 NCAC 13A .0102 to .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: 704.663.6040

Lost Potw Sludge
POTW Sludge
P005 15 tons.
x 2000 #

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
To: Morris, Sean

4/11/08

3000 #/12
2500 #/month
5/19/2009 2:02 PM

+ Shop Floor
Snt Acc Area
Approt @ Drum

Annual
Ready Now

**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  
[hlinyard@smwpc.com](mailto:hlinyard@smwpc.com)  
828-695-2755  
fax 828-465-3447

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Sept 08  
Alan left

# 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

13 MAY 09  
April 21, 2008  
w/sm

1. **Facility Information:** Special Metals Welding Products  
1401 Burris Road  
Newton, NC 28658-1754  
NCD 980 841 951, Large Quantity Generator

828-465-0352  
x211

2. **Facility Contact:** Alan Jones, Plant Engineer

3. **Survey Participants:** Alan Jones, Stephen Barron

3 Monis

4. **Date of Inspection:** ~~April 16, 2008~~ 13 May 09 10 AM

5. **Purpose of Inspection:** To determine compliance with 40 CFR 260-279

6. **Facility Description:** Hawthorn 257255

in charge  
Hewitt  
Linyard

- 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.

Bobby  
Catoe

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.

9,000 Barium  
- April

8. Areas of Inspection:

See Search  
copies

• Manifests

- 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.
- Transporter: Envirite of Ohio OHD 980 568 992 ✓
- TSD: Envirite of Ohio OHD 980 568 992 ✓

4  
9-11-08  
#1590611  
No Sign of Return  
#1591-960

9,000 / 3 months  
→ Bill

• Weekly Inspections

- Weekly inspections documents were reviewed.
- Inspections are being performed and documented correctly.

By Bobby Cutroe

• Training

- 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. ✓

NO JOB DONE

(X)  
Hazardous  
Training  
Not Trained  
EPC Steve Winslow  
When TOM Dickson  
Sign manifest

NO FOR THE...  
R.L. Casae  
R.L. Casae

5/27/08

• 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.
- 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. / cell phone.

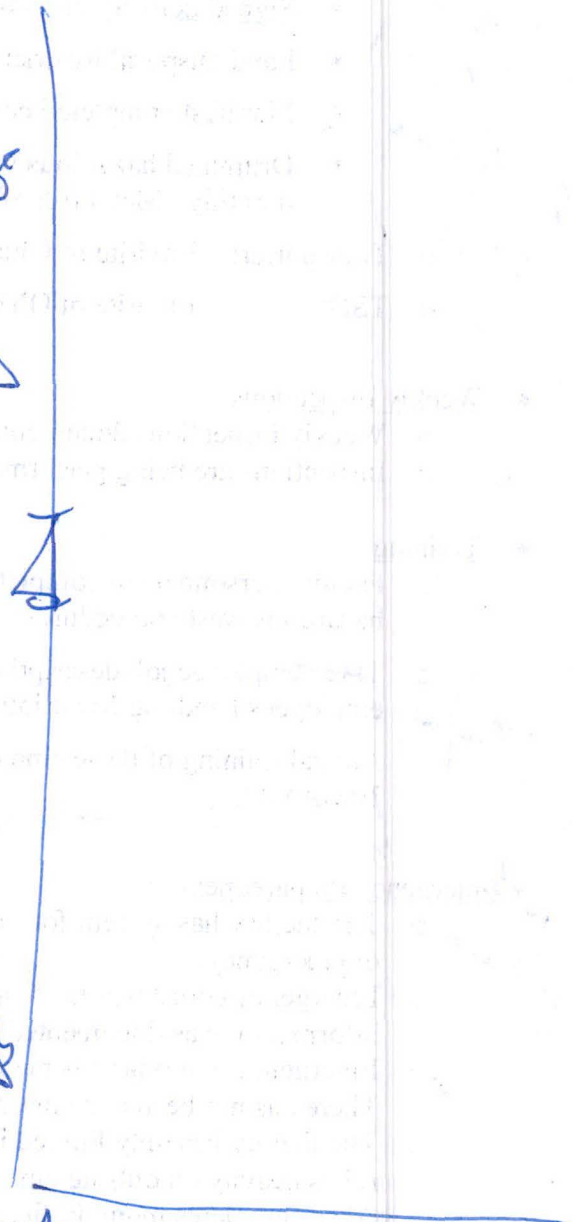
3  
(X) Not updated

2100-2800  
3-4 Drum / month  
700#  
Mack

10828  
14853

Banner

Seepage  
to Soil



> 55 gal  
- open

• Contingency Plan

- The facility has not completed and documented arrangements with local emergency facilities.
- 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.

*Completed 23 May 08  
not updated with Alan Jones leaving.*

• Biennial Report

- The facility's last Biennial Report was submitted on 28MAR08
- The annual RCRA fees were paid on 13AUG07.

*Could not find*

• Waste Minimization Plan

- The Waste Minimization plan was located on site and was reviewed.

*from last time*

• Accumulation Areas

- There were 6 satellite accumulation areas at the facility.
- The satellite accumulation area consisted one closed head 55 gal. container.
- Containers were labeled correctly.
- Containers were closed.

*one drum  
Floor Drum*

• Hazardous Waste Storage Areas:

There was one hazardous waste storage area at the facility located at the Rear Pad area.

*+ Cell Phone By Bobby*

- It held 2 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.

*2 2 1/2 Blue photo.  
Barium Sulfide*

*OK*

• 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.

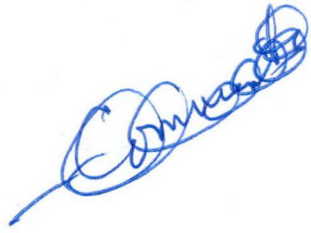
*Sodium Vapor Shipped*

*Tuesday 19 May Cleanout Planned*

*5 Gal. Drum  
out side  
Drum  
Bay house  
X7  
#6  
55 gal  
2 drums  
X8  
#5  
Top of  
Bay house  
X6*



- 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.**

5-2.

4 Dimes + 1

Picking Goal 48-09

Comments  
① Manifest 3-Reinf  
Keep -  
mgt System  
② Update Plan gone  
Notification  
8700-12

**10. Comments/Recommendations:**

- Digital photos were taken during the inspection.



FLUX PIT D005 Waste Solids/ Water to POTW

3. - Has white  
Panel  
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

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 possibility of the waste residues from migrating to nearby soils.

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Comment#4: Violations 6&7 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.

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: 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  
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

Date: 5/13 Site Name: SPECIAL METALS

Address: \_\_\_\_\_ County: \_\_\_\_\_

Contact / Phone #: \_\_\_\_\_

Participants: HEWITT LINYARD - QA MANAGER  
BOBBY CATOR - PROCESS ENGINEER

Weather Conditions: \_\_\_\_\_

Notes: Apr. 16 2008 - LAST INSPECTION

7/2/08 1<sup>st</sup> 50g      Approx 10,500g  
 7<sup>th</sup> 6163g  
 6<sup>th</sup> 3084g  
 2<sup>nd</sup> 1198g

---

11/14/08 2<sup>nd</sup> 110g      10,400g  
 7<sup>th</sup> 385g      1198g  
 6<sup>th</sup> 330g      11,598g  
 2<sup>nd</sup> 700g

12/9/08 2<sup>nd</sup> 1600g  
 3<sup>rd</sup> 2400g      4,800g  
 1<sup>st</sup> 800g  
 1<sup>st</sup>

1/22/09 1<sup>st</sup> 700g  
 4<sup>th</sup> 2800g      41,900g  
 2<sup>nd</sup> 1400g

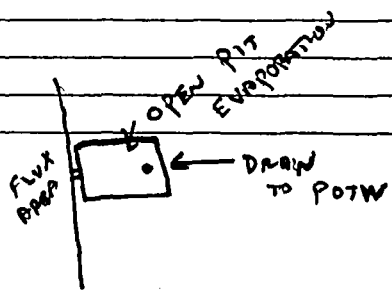
3<sup>rd</sup> 165g  
 6400g  
 700g

4/10/09

5/17/09  
 5 Dams

\* Coolant Water  
 Fix Pump

- WASTE
- 1. PROFILE
  - " HEAVY - TRAWING
  - UNIVERSAL WASTE PERMIT
  - BIENNIAL



Sean Moore  
 E-mailed Copy

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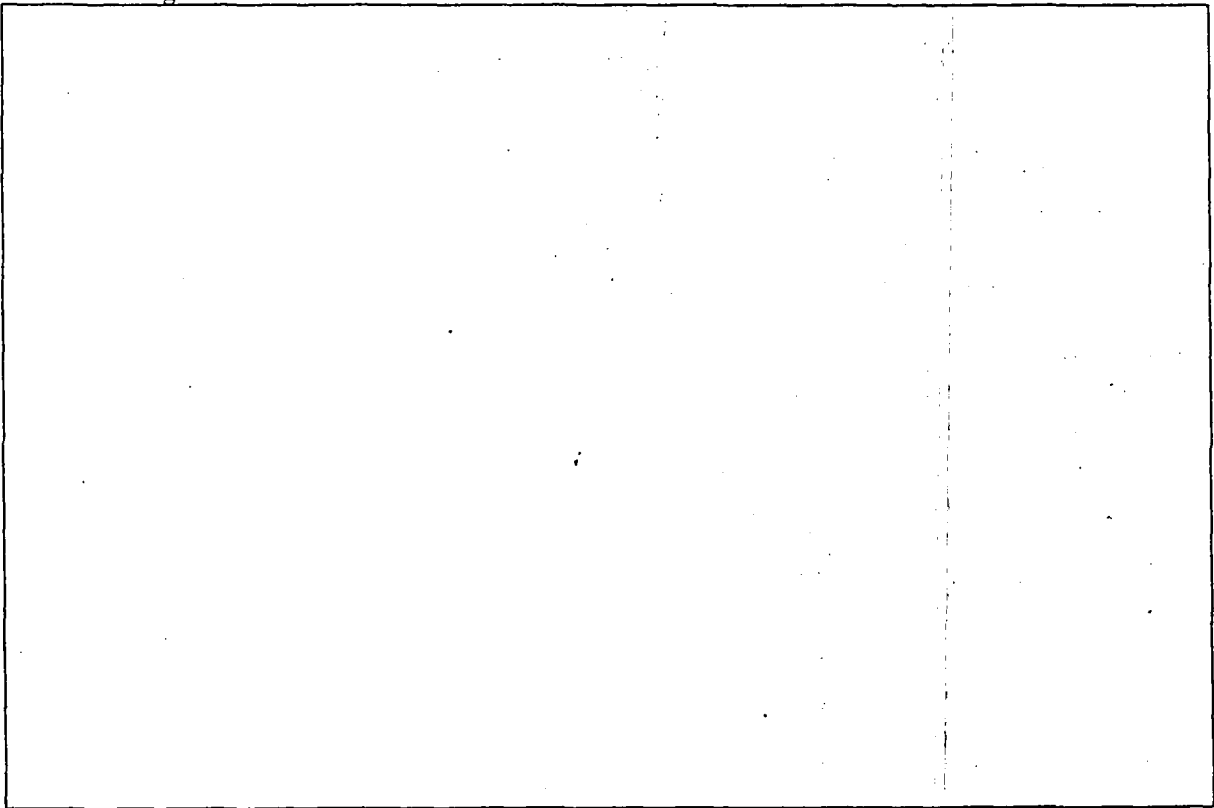
**Photographs (time and locations):** \_\_\_\_\_

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**Documents Copied:** \_\_\_\_\_

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**Site Drawing:**



**Referrals:**

NC DWQ-Aquifer Protection \_\_\_\_\_

NC DWQ-Surface Water Protection \_\_\_\_\_

NC DAQ \_\_\_\_\_

Solid Waste Section \_\_\_\_\_

EPA \_\_\_\_\_

County Agency \_\_\_\_\_

Other \_\_\_\_\_

**SPECIAL METALS WELDING PRODUCTS COMPANY –  
Newton, NC**

Integrated Contingency Plan

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**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**

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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



# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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

#### ***Purpose and Scope of Plan Coverage***

The purpose of this Integrated Contingency Plan (ICP) 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 not 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.

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## 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

### ***General Facility Information***

FACILITY NAME: SPECIAL METALS WELDING PRODUCTS COMPANY  
A Subsidiary of Precision Castparts Corporation

OPERATOR: HUNTINGTON ALLOYS  
A SPECIAL METALS COMPANY  
3200 Riverside Drive  
Huntington, WV 25705

PHYSICAL ADDRESS: 1401 Burriss Road, Newton, Catawba County  
North Carolina 28658

LATITUDE/LONGITUDE: 35.686581, -81.196861

SIC CODE: 3356 (Roll, Draw, & Extrude Nonferrous)

NAICS CODE: 331491 (Nonferrous metal (except copper and aluminum) rolling, drawing and extruding)

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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**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

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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 guidance 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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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.

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## Integrated Contingency Plan

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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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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 Liquefied 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: **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:



# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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- 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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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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: They 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 off all electrical energy to the hydraulic pump.

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## Integrated Contingency Plan

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### ***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.

Note on Reportable Quantity: 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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

Integrated Contingency Plan

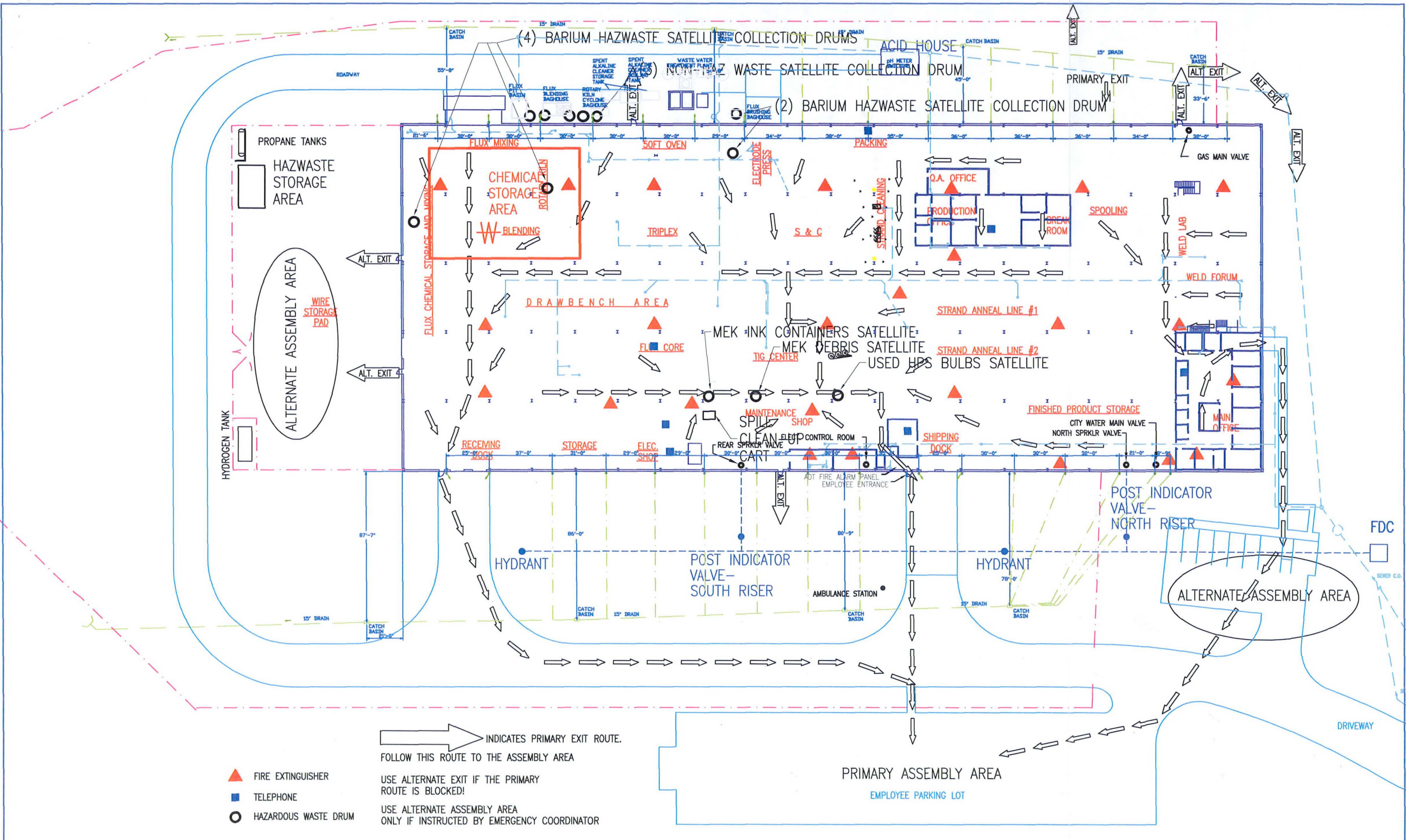
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## **SECTION III -- ANNEXES**

### ***1. Facility and Locality Information***

((maps, etc.))

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- INDICATES PRIMARY EXIT ROUTE.
- FOLLOW THIS ROUTE TO THE ASSEMBLY AREA
- FIRE EXTINGUISHER
- TELEPHONE
- HAZARDOUS WASTE DRUM
- USE ALTERNATE EXIT IF THE PRIMARY ROUTE IS BLOCKED!
- USE ALTERNATE ASSEMBLY AREA ONLY IF INSTRUCTED BY EMERGENCY COORDINATOR

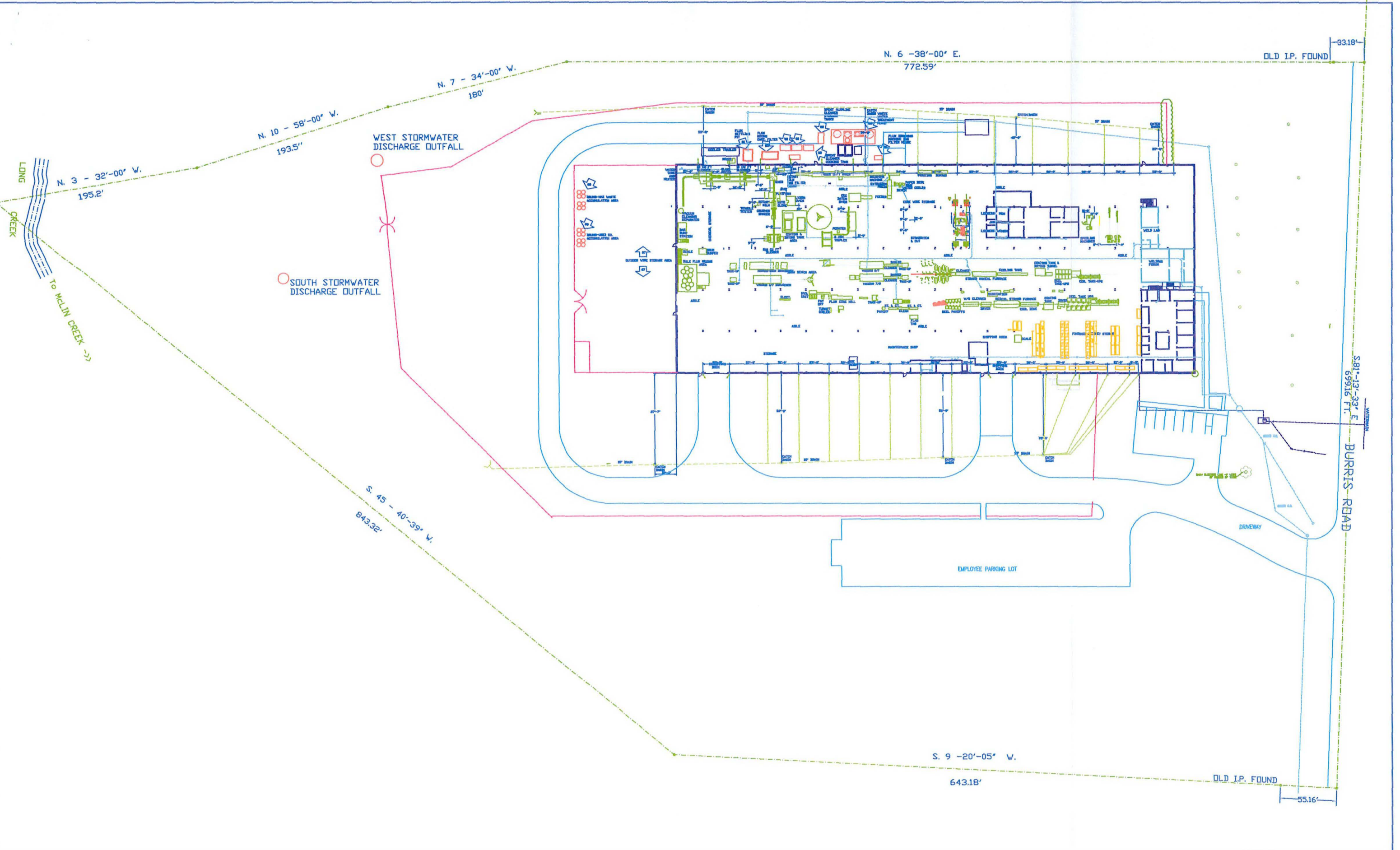
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DATE 5-22-2008  
SCALE NONE  
DRAWN AE Jones  
CHK'D  
APPROV'D  
FOR B/M SEE  
REFERENCE DRAWINGS

SPECIAL METALS  
SPECIAL METALS WELDING PRODUCTS  
1401 Burris Road  
Newtown, NC 28658-1754  
INTEGRATED CONTINGENCY PLAN  
EVACUATION PLAN -  
FIRE & EMERGENCY EQUIPMENT LOCATIONS  
EQUIP. No. 01100100

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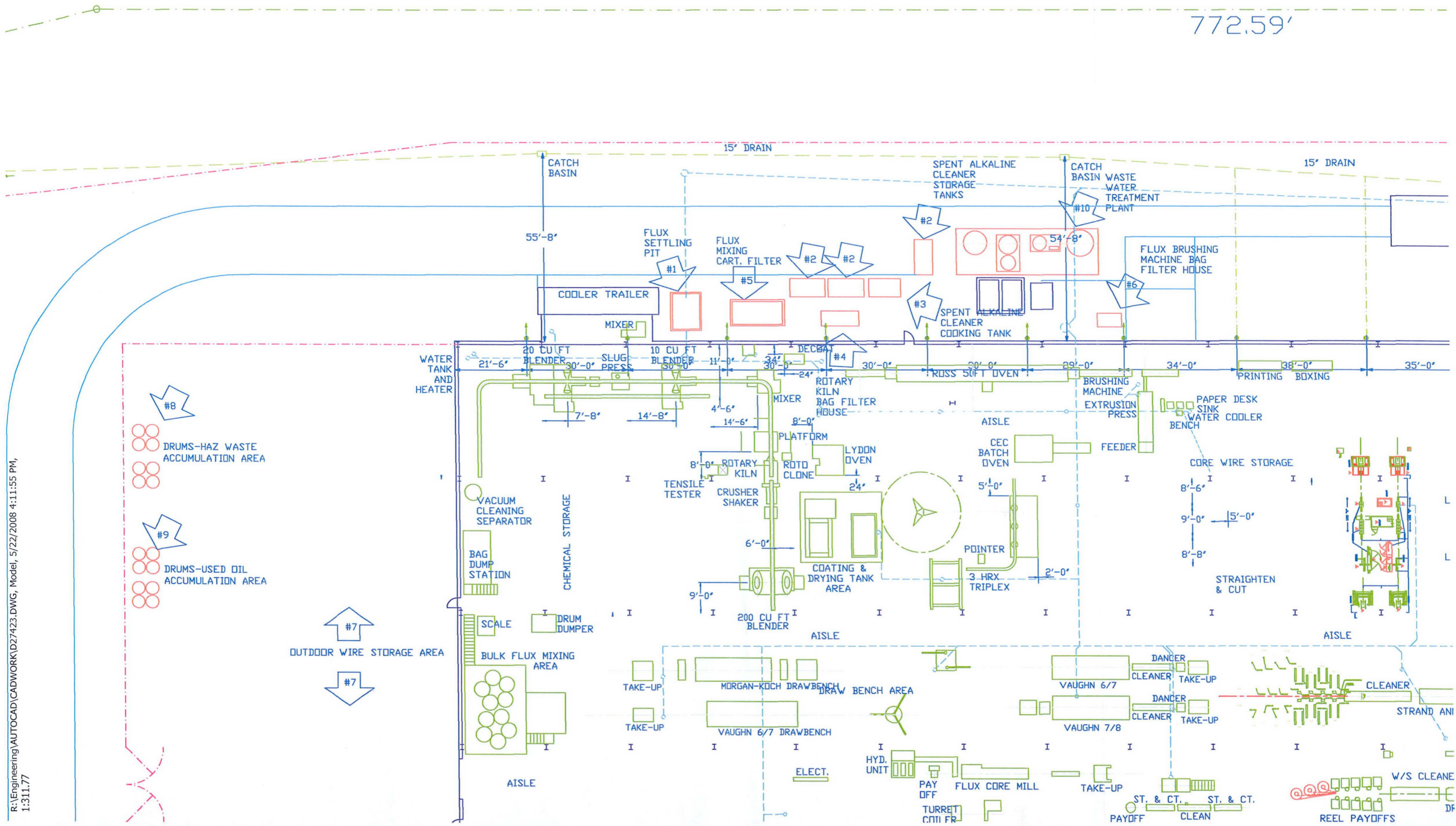
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1 Minor revision, change scale AEJ 5-13-08																							
																		DATE		B-17-95			
																		SCALE		1" = 40'			
																		DRAWN		RAF			
																		CHK'D		LDO			
																		APP'VD		MRM			
																		P/R No.		95-07-1705			
																		EQUIP. No.		D-27423			

**SPECIAL METALS** SPECIAL METALS WELDING PRODUCTS  
 1401 Burris Road  
 Newton, NC 28658-1754

PLANT UTILITIES  
 HAZARDS - STORMWATER PROTECTION PLAN  
 WELDING PRODUCTS - NEWTON, NC

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# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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

Tom Dickerson  
- 335 Holland Drive  
Statesville, NC 28677  
704-872-4292

3<sup>rd</sup> Alternate

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.



# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **2.2 Plant Personnel**

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

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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, LEPC)**

Mr. David Weldon - Coordinator

828-465-8233  
(cel) 828-302-5139

(alt.: Ms. Shonda Hollis – Administrative Asst.)

P.O. Box 389  
Newton, NC 28658

828-465-8232

#### **City of Newton Police Department**

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

828-695-4313  
828-695-4337  
(cel) 828-217-4456

Alternate Numbers: Public Works After-Hours Emergency: 828-465-7430

Mr. Danny Sigmon 828-695-4346

Public Works Normal Hours 828-695-4310

P.O. Box 550  
Newton, NC 28658

#### **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

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

Integrated Contingency Plan

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**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

336-492-5714  
(cel) 919-270-2186

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### **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.

# SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC

## Integrated Contingency Plan

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### 3. Incident Documentation

#### Hazardous Waste Release Form

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

Date: \_\_\_\_\_ Emergency Coordinator: \_\_\_\_\_  
Notified of release by: Name \_\_\_\_\_ Position \_\_\_\_\_  
At: \_\_\_\_\_ Time: \_\_\_\_\_  
Location of release: \_\_\_\_\_  
\_\_\_\_\_

Released material(s) (state quantity): \_\_\_\_\_  
\_\_\_\_\_

#### ASSESSMENT OF HAZARDS:

Contamination of Creek	Quantity: _____
Contamination of Sewer	Quantity: _____
Contamination of Soil	Quantity: _____
Other	Quantity: _____

#### CLEAN-UP REPORT

1. Describe actions taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
2. Quantity of contaminated material (soil or Water): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
3. How was material in (2) disposed of? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
4. What equipment was used in the clean-up? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
5. Has this equipment been cleaned, repaired, and placed back in its proper storage area as stated in the Contingency Plan?  
\_\_\_\_\_  
\_\_\_\_\_

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

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## ***4. Training and Exercises/Drills Records***

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### ***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.

# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### ***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.



# **SPECIAL METALS WELDING PRODUCTS COMPANY – Newton, NC**

## **Integrated Contingency Plan**

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### ***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.



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

TO BB14 May 09  
/sm

**HAZARDOUS WASTE SECTION**  
**DRAFT #1 13MAY09**  
**FACILITY INSPECTION REPORT**

May 13, 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. **Survey Participants:** 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

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Phone: 704-663-1699 \ FAX: 704-663-6040

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:

### • Manifests

- Manifests were 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.
- Transporter: Envirite of Ohio OHD 980 568 992
- TSD: Envirite of Ohio OHD 980 568 992

### • Weekly Inspections

- Weekly inspections documents were reviewed.
- 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 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.
  
- Contingency Plan
  - The facility has completed and documented arrangements with local emergency authorities.
  - 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).**
  - All emergency equipment is indicated in the plan.
  - 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).**
  - 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)**

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- **These containers of hazardous waste were 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).**
  - 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.
  
- 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 were 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.**

**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 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;

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- (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



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.**

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**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.



PHOTO #6

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**Stephen H. Barron**  
**Environmental Senior Specialist**

**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 007.jpg



13may09 008.jpg



13may09 009.jpg



13may09 010.jpg



13may09 011.jpg



13may09 012.jpg



13may09 013.jpg

Special Metal

13may09

Lawson

w/ Simon Morris



**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

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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.




Draft #1  
Inspection Notes

Date: 13 May 09 Site Name: Special Metals

Address: \_\_\_\_\_ County: \_\_\_\_\_

Contact / Phone #: \_\_\_\_\_

Notes: Potential Violations

- 1 - Hazardous Waste Employees not annually Trained
  - Hewitt Lyngard - Sign manifest
  - Steve Winnell - Emer. Coord
  - Tom Dickerson - Emer. Coord.
- 2 - Not Job Descriptions for Hazard waste Employees
  - Willie Logan
  - R.L. Cator - Sign manifest
  - Hewitt Lyngard - Sign manifest
- 3 - Contingency Plan not updated (Alan Jones)
- ✓ 4 - Manifest not with Signed copy
  - Failure to do Exception Report (1590611 - 1591960?)
- 5 - Waste ~~Area~~ Storage Area
  - 5 - Aisle Space
  - 6 - Waste outside drum.
- Satellite Accum. Area
  - Baghouse # 6
  - 7 - Waste Spillage / 26 \$ (31)
- Baghouse # 5
  - 8 - Open Container
  - 9 - 7 55 gal in Area.
  - 10 Not under Control of operation
- Comments
- 1 - Management of all RCRA paperwork
- 2 - Update COPA form 8700-12 (Alan Jones)
- 3 - Recommend DWQ? 

Baron  
13 May 09



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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](http://www.specialmetalswelding.com)  
e-mail: [ajones@smwpc.com](mailto: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  
Mooreville, NC 28115

**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,



Alan E. Jones – Manager Engineering, Safety, Health and Environment  
Special Metals Welding Products Company

Cc:

Steve Winnell  
Tom Dickerson  
Jeannie Martin  
Gary Beard  
Willie Logan

## **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.



\* \* \* Communication Result Report ( Jul. 10. 2008 10:01AM ) \* \* \*

1) Special Metals  
2)

Date/Time: Jul. 10. 2008 9:57AM

File No.	Mode	Destination	Pg(s)	Result	Page Not Sent
0723	Memory TX	917178546757	P. 13	OK	

## Reason for error

E. 1) Hang up or line fail  
E. 3) No answer  
E. 5) Exceeded max. E-mail size

E. 2) Busy  
E. 4) No facsimile connection

**Alan Jones**

From: Alan Jones  
Sent: Thursday, July 10, 2008 9:47 AM  
To: 'mrmee@penrite.com'  
Subject: Three signed profiles for Special Metals Welding Products  
Attachments: 20080710093828979.pdf



2008071009382897  
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

Alan Jones

---

**From:** Alan Jones  
**Sent:** Thursday, July 10, 2008 9:47 AM  
**To:** 'mmusse@envirite.com'  
**Subject:** 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

# Envirite

## Waste Material Profile Sheet

Profile: 16342

03 JUL 2008

Page 1 of 4

<b>A. Profile Information</b>	
Profile: 16342	File Ref #: 14853
Common Description: BARIUM SLUDGE	

<b>B. Company Information</b>		
<b>Generator Address</b> Special Metals Welding Products 1401 Burris Road  Newton, NC 28658 NCD980841951 Contact: Alan Jones 828-465-0352 EXT211 828-465-0352 SIC:                      NAICS:	<b>Bill-To Address</b> Special Metals Welding Products 1401 Burris Road  Newton, NC 28658 NCD980841951 Contact: 828-465-0352	<b>Disposal Facility Address</b> Envirite of Pennsylvania, Inc. 730 Vogelsong Road  York, PA 17404 PAD010154045

<b>C. DOT Information</b>	
DOT Name: RQ, Hazardous waste, liquid, n.o.s., 9, NA3082, PG III (D005)	
Container Type: DM / <i>TT</i> Container Size: 55 / <i>5000</i>	

<b>D. Biennial/Annual Reporting Information</b>	
Source Code G15	Form Code W319

<b>E. Physical Properties</b>		
Color: Grey	Odor: None	% Oil/Grease: 0

<b>FLASH POINT</b> <input type="checkbox"/> < 100 F <input type="checkbox"/> 100 - 139 F <input type="checkbox"/> > 140 F <input checked="" type="checkbox"/> > 200 F	<b>FREE LIQUIDS</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<b>PHASES</b> <input checked="" type="checkbox"/> SINGLE <input type="checkbox"/> DOUBLE <input type="checkbox"/> MULTI
<b>PHYSICAL STATE</b> <input type="checkbox"/> SOLID <input type="checkbox"/> POWDER <input checked="" type="checkbox"/> SLUDGE <input type="checkbox"/> LIQUID <input type="checkbox"/> LIQUID/SOLID	<b>pH</b> <input type="checkbox"/> < 2 <input type="checkbox"/> > 2 - < 4.9 <input checked="" type="checkbox"/> > 5 - < 9.9 <input type="checkbox"/> > 10 - < 12.4 <input type="checkbox"/> > 12.5	

<b>F. TCLP</b>							
<b>TCLP</b>							

	Actual Value		Reg. Level	UM		Actual Value		Reg. Level	UM
ARSENIC TCLP	5	<	5.0	MG/L	BARIUM TCLP	100	>	100.0	MG/L
CADMIUM TCLP	1	<	1.0	MG/L	CHROMIUM TCLP	5	<	5.0	MG/L
LEAD TCLP	5	<	5.0	MG/L	MERCURY TCLP	.2	<	0.2	MG/L
SELENIUM TCLP	1	<	1.0	MG/L	SILVER TCLP	5	<	5.0	MG/L
BENZENE TCLP	.5	<	0.5	MG/L	CARBON TETRACHLORIDE TCLP	.5	<	0.5	MG/L
CHLORDANE TCLP	.03	<	0.03	MG/L	CHLOROBENZENE TCLP	100	<	100.0	MG/L

# Envirite

## Waste Material Profile Sheet

03 JUL 2008

Page 2 of 4

Profile: 16342

CHLOROFORM TCLP	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
HEXACHLOROENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLOROENZENE TCLP	7.5	<	7.5	MG/L
HEXACHLORO-1,3 BUTADIENE T	.5	<	.5	MG/L	HEXACHLOROETHANE TCLP	3	<	3	MG/L
NITROENZENE 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					

### G. Underlying Haz. Constituents

	Value	UM
NONE		%

### H. Chemical Composition

Chemical	Low	High	UM
Other			
Water	=	10	%
Barium Sludge	=	90	%

Is this a RCRA Hazardous waste per 40 CFR 261 or equivalent State Regulation? **Yes**  
 Is this a Listed Hazardous waste per 40 CFR 261 or equivalent State Regulation? **No**  
 Is this a Characteristic Hazardous waste per 40 CFR 261 or equivalent State Regulation? **Yes**

### I. Waste Codes

D005 Barium	
-------------	--

### J. Generation Information

<b>Generating Process:</b> CLEAN-UP FROM WASHING EQUIPMENT AFTER MIXING FLUX - ACCUMULATION INTO PIT.	
<b>Generation Rate:</b> 20 TON per YR	

**K. Waste Characteristics**

- Insecticides
- Shock Sensitive
- Pesticides
- Herbicides
- Radioactive:
- Medical Waste
- Oxidizers

- 
- Dioxin
- Pyrophoric
- Household Waste:
- Crystalline Free Silica
- Explosive
- Asbestos:

- Carcinogen
- PCB's:
- RX Cyanide >250ppm
- RX Sulfide >500ppm
- (Unless Checked) None Apply
- Other (specify)

Additional Informatior

# Envirite

## Waste Material Profile Sheet

Profile: 16342

03 JUL 2008

Page 4 of 4

### L. Regulatory Characterization

- |   |   |
|---|---|
| <input type="checkbox"/> IS THIS A WASTEWATER PER 40CFR 268                 | <input type="checkbox"/> BY PRODUCT                                   |
| <input checked="" type="checkbox"/> IS THIS A NON-WASTEWATER PER 40 CFR 268 | <input type="checkbox"/> RX WITH LIME TO CREATE FLAM. GAS             |
| <input type="checkbox"/> UNIVERSAL WASTE                                    | <input checked="" type="checkbox"/> DOES NOT RX VIOLENTLY WITH LIME   |
| <input type="checkbox"/> CHARACTERISTIC SLUDGE                              | <input type="checkbox"/> CONTAINS VOCS OVER 500PPM                    |
| <input type="checkbox"/> VIRGIN UNUSED PRODUCT                              | <input checked="" type="checkbox"/> DOES NOT CONTAIN VOCS OVER 500PPM |
| <input checked="" type="checkbox"/> SPENT MATERIAL                          | <input type="checkbox"/> CONTAINS METALLIC FINES/POWDERS              |
| <input type="checkbox"/> WASTE HAS BEEN TREATED                             | <input type="checkbox"/> POLLUTION CONTROL WASTE (IL)                 |
| <input type="checkbox"/> CYANIDE PLATING ON SITE                            | <input type="checkbox"/> INDUSTRIAL PROCESS WASTE (IL)                |
| <input type="checkbox"/> SUBSTITUTE COMMERCIAL PRODUCT                      |   |

(Mark ALL conditions that apply, a blank response confirms the above condition(s) do not apply to this waste stream.)

*This form must be signed by a person authorized to represent the generator. If the individual signing the Waste Profile is a broker or other agent not employed by the generator of the waste, the generator must provide written notification (on generator letterhead) documenting the authority granted that individual.*

I authorize Envirite to make corrections to this waste profile. I understand that I will be required to confirm any changes in writing.  Yes  No

I hereby avow that any pertinent information that is known by the generator concerning possible hazards has been disclosed. I certify that, to the best of my knowledge, all statements and attachments are correct and accurate representations of this waste material.

Signee Name

Signee Date

Signee Title

ALAN JONES

7-10-08

Plant Engineer

Signature

Alan Jones

Company

Special Metals Welding Prod

Date of Sampling: \_\_\_\_\_

Time of Sampling: \_\_\_\_\_

AM/PM

Sampler Name: \_\_\_\_\_

Sampler Signature: \_\_\_\_\_

Title and Affiliation of Sampler:  
\_\_\_\_\_

# Envirite

## Waste Material Profile Sheet

Profile: 16343

03 JUL 2008

Page 1 of 4

### A. Profile Information

Profile: 16343

File Ref #: 10827

Common Description: EXTRUSION SOLIDS

### B. Company Information

#### Generator Address

Special Metals Welding Products  
1401 Burris Road

Newton, NC 28658

NCD980841951

Contact: Alan Jones 828-465-0352 EXT211

828-465-0352

SIC:

NAICS:

#### Bill-To Address

Special Metals Welding Products  
1401 Burris Road

Newton, NC 28658

NCD980841951

Contact: Alan Jones 828-465-0352 EXT211

828-465-0352

#### Disposal Facility Address

Envirite of Pennsylvania, Inc.  
730 Vogelsong Road

York, PA 17404

PAD010154045

### C. DOT Information

DOT Name: RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)

Container Type: DM

Container Size: 55

### D. Biennial/Annual Reporting Information

Source Code G21

Form Code W319

### E. Physical Properties

Color: Black

Odor: N/A

% Oil/Grease: 0

<b>FLASH POINT</b> <input type="checkbox"/> < 100 F <input type="checkbox"/> 100 - 139 F <input type="checkbox"/> > 140 F <input checked="" type="checkbox"/> > 200 F	<b>FREE LIQUIDS</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<b>PHASES</b> <input checked="" type="checkbox"/> SINGLE <input type="checkbox"/> DOUBLE <input type="checkbox"/> MULTI
<b>PHYSICAL STATE</b> <input checked="" type="checkbox"/> SOLID <input type="checkbox"/> POWDER <input type="checkbox"/> SLUDGE <input type="checkbox"/> LIQUID <input type="checkbox"/> LIQUID/SOLID	<b>pH</b> <input type="checkbox"/> < 2 <input type="checkbox"/> > 2 - < 4.9 <input checked="" type="checkbox"/> > 5 - < 9.9 <input type="checkbox"/> > 10 - < 12.4 <input type="checkbox"/> > 12.5	

### F. TCLP

#### TCLP

	Actual Value	Reg. Level	UM		Actual Value	Reg. Level	UM		
ARSENIC TCLP	5	<	5.0	MG/L	BARIUM TCLP	100	>	100.0	MG/L
CADMIUM TCLP	1	<	1.0	MG/L	CHROMIUM TCLP	5	<	5.0	MG/L
LEAD TCLP	5	<	5.0	MG/L	MERCURY TCLP	.2	<	0.2	MG/L
SELENIUM TCLP	1	<	1.0	MG/L	SILVER TCLP	5	<	5.0	MG/L
BENZENE TCLP	.5	<	0.5	MG/L	CARBON TETRACHLORIDE TCLP	.5	<	0.5	MG/L
CHLORDANE TCLP	.03	<	0.03	MG/L	CHLOROBENZENE TCLP	100	<	100.0	MG/L

# Envirite

## Waste Material Profile Sheet

Profile: 16343

03 JUL 2008

Page 2 of 4

CHLOROFORM TCLP	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
HEXACHLOROENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLOROENZENE TCLP	7.5	<	7.5	MG/L
HEXACHLORO-1,3 BUTADIENE T	.5	<	.5	MG/L	HEXACHLOROETHANE TCLP	3	<	3	MG/L
NITROENZENE 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					

### G. Underlying Haz. Constituents

	Value	UM
NONE		%

### H. Chemical Composition

Chemical	Low	High	UM
Other			
Extrusion Solids	=	100	%
Barium	>	100	PPM

Is this a RCRA Hazardous waste per 40 CFR 261 or equivalent State Regulation? Yes  
 Is this a Listed Hazardous waste per 40 CFR 261 or equivalent State Regulation? No  
 Is this a Characteristic Hazardous waste per 40 CFR 261 or equivalent State Regulation? Yes

### I. Waste Codes

D005 Barium

### J. Generation Information

**Generating Process:** FLUX EXTRUSION SCRAP SOLIDS FROM MANUFACTURING OF WELDING RODS. THE METAL RODS ARE A NICKEL ALLOY (WITH CHROME OR MOLYBDENUM) BUT NONE OF THE METAL FROM THESE RODS WILL BE PART OF THE MAKE UP OF THIS WASTE.

**Generation Rate:** 10 DM per QTR



# Envirite

## Waste Material Profile Sheet

Profile: 16343

03 JUL 2008

Page 3 of 4

### K. Waste Characteristics

- |  |  |   |
|--|--|---|
| Insecticides <input type="checkbox"/>    | <input type="checkbox"/>                         | Carcinogen <input type="checkbox"/>                             |
| Shock Sensitive <input type="checkbox"/> | Dioxin <input type="checkbox"/>                  | PCB's: <input type="checkbox"/>                                 |
| Pesticides <input type="checkbox"/>      | Pyrophoric <input type="checkbox"/>              | RX Cyanide >250ppm <input type="checkbox"/>                     |
| Herbicides <input type="checkbox"/>      | Household Waste: <input type="checkbox"/>        | RX Sulfide >500ppm <input type="checkbox"/>                     |
| Radioactive: <input type="checkbox"/>    | Crystalline Free Silica <input type="checkbox"/> | (Unless Checked) None Apply <input checked="" type="checkbox"/> |
| Medical Waste <input type="checkbox"/>   | Explosive <input type="checkbox"/>               | Other (specify) <input type="checkbox"/>                        |
| Oxidizers <input type="checkbox"/>       | Asbestos: <input type="checkbox"/>               |   |

Additional Informator

# Envirite

## Waste Material Profile Sheet

Profile: 16343

03 JUL 2008

Page 4 of 4

### L. Regulatory Characterization

- |   |   |
|---|---|
| <input type="checkbox"/> IS THIS A WASTEWATER PER 40CFR 268                 | <input type="checkbox"/> BY PRODUCT                                   |
| <input checked="" type="checkbox"/> IS THIS A NON-WASTEWATER PER 40 CFR 268 | <input type="checkbox"/> RX WITH LIME TO CREATE FLAM. GAS             |
| <input type="checkbox"/> UNIVERSAL WASTE                                    | <input checked="" type="checkbox"/> DOES NOT RX VIOLENTLY WITH LIME   |
| <input type="checkbox"/> CHARACTERISTIC SLUDGE                              | <input type="checkbox"/> CONTAINS VOCS OVER 500PPM                    |
| <input type="checkbox"/> VIRGIN UNUSED PRODUCT                              | <input checked="" type="checkbox"/> DOES NOT CONTAIN VOCS OVER 500PPM |
| <input checked="" type="checkbox"/> SPENT MATERIAL                          | <input type="checkbox"/> CONTAINS METALLIC FINES/POWDERS              |
| <input type="checkbox"/> WASTE HAS BEEN TREATED                             | <input type="checkbox"/> POLLUTION CONTROL WASTE (IL)                 |
| <input type="checkbox"/> CYANIDE PLATING ON SITE                            | <input type="checkbox"/> INDUSTRIAL PROCESS WASTE (IL)                |
| <input type="checkbox"/> SUBSTITUTE COMMERCIAL PRODUCT                      |   |

(Mark ALL conditions that apply, a blank response confirms the above condition(s) do not apply to this waste stream.)

*This form must be signed by a person authorized to represent the generator. If the individual signing the Waste Profile is a broker or other agent not employed by the generator of the waste, the generator must provide written notification (on generator letterhead) documenting the authority granted that individual.*

I authorize Envirite to make corrections to this waste profile. I understand that I will be required to confirm any changes in writing.  Yes  No

I hereby avow that any pertinent information that is known by the generator concerning possible hazards has been disclosed. I certify that, to the best of my knowledge, all statements and attachments are correct and accurate representations of this waste material.

Signee Name

Signee Date

Signee Title

ALAN JONES

7-10-08

PLANT ENGINEER

Signature

Alan Jones

Company

Special Metals Welding Products

Date of Sampling: \_\_\_\_\_

Time of Sampling: \_\_\_\_\_

AM/PM

Sampler Name: \_\_\_\_\_

Sampler Signature: \_\_\_\_\_

Title and Affiliation of Sampler: \_\_\_\_\_

# Envirite

## Waste Material Profile Sheet

Profile: 16344

03 JUL 2008

Page 1 of 4

<b>A. Profile Information</b>	
Profile: 16344	File Ref #: 10828
Common Description: BAG HOUSE DUST	

<b>B. Company Information</b>		
<b>Generator Address</b> Special Metals Welding Products 1401 Burris Road  Newton, NC 28658 NCD980841951 Contact: Alan Jones 828-465-0352 EXT211 828-465-0352 SIC:                      NAICS:	<b>Bill-To Address</b> Special Metals Welding Products 1401 Burris Road  Newton, NC 28658 NCD980841951 Contact: 828-465-0352	<b>Disposal Facility Address</b> Envirite of Pennsylvania, Inc. 730 Vogelsong Road  York, PA 17404 PAD010154045

<b>C. DOT Information</b>	
DOT Name: RQ, Hazardous waste, solid, n.o.s., 9 , NA3077, PG III (D005)	
Container Type: DM	Container Size: 55

<b>D. Biennial/Annual Reporting Information</b>	
Source Code G21	Form Code W319

<b>E. Physical Properties</b>		
Color: Black	Odor: N/A	% Oil/Grease: 0

<b>FLASH POINT</b> <input type="checkbox"/> < 100 F <input type="checkbox"/> 100 - 139 F <input type="checkbox"/> > 140 F <input checked="" type="checkbox"/> >200 F	<b>FREE LIQUIDS</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<b>PHASES</b> <input checked="" type="checkbox"/> SINGLE <input type="checkbox"/> DOUBLE <input type="checkbox"/> MULTI
<b>PHYSICAL STATE</b> <input type="checkbox"/> SOLID <input checked="" type="checkbox"/> POWDER <input type="checkbox"/> SLUDGE <input type="checkbox"/> LIQUID <input type="checkbox"/> LIQUID/SOLID	<b>pH</b> <input type="checkbox"/> <2 <input type="checkbox"/> >2 - <4.9 <input checked="" type="checkbox"/> >5 - <9.9 <input type="checkbox"/> >10 - <12.4 <input type="checkbox"/> >12.5	

<b>F. TCLP</b>									
<b>TCLP</b>									
	Actual Value		Reg. Level	UM		Actual Value	Reg. Level	UM	
ARSENIC TCLP	5	<	5.0	MG/L	BARIUM TCLP	100	>	100.0	MG/L
CADMIUM TCLP	1	<	1.0	MG/L	CHROMIUM TCLP	5	<	5.0	MG/L
LEAD TCLP	5	<	5.0	MG/L	MERCURY TCLP	.2	<	0.2	MG/L
SELENIUM TCLP	1	<	1.0	MG/L	SILVER TCLP	5	<	5.0	MG/L
BENZENE TCLP	.5	<	0.5	MG/L	CARBON TETRACHLORIDE TCLP	.5	<	0.5	MG/L
CHLORDANE TCLP	.03	<	0.03	MG/L	CHLOROBENZENE TCLP	100	<	100.0	MG/L

# Envirite

## Waste Material Profile Sheet

Profile: 16344

03 JUL 2008

Page 2 of 4

CHLOROFORM TCLP	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
HEXACHLORO BENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLORO BENZENE 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
VINYL CHLORIDE TCLP	.2	<	0.2	MG/L					

### G. Underlying Haz. Constituents

	Value	UM
NONE		%

### H. Chemical Composition

Chemical	Low	High	UM
Other			
Barium	>	100	PPM
Bag House Dust	=	100	%

Is this a RCRA Hazardous waste per 40 CFR 261 or equivalent State Regulation? Yes  
 Is this a Listed Hazardous waste per 40 CFR 261 or equivalent State Regulation? No  
 Is this a Characteristic Hazardous waste per 40 CFR 261 or equivalent State Regulation? Yes

### I. Waste Codes

D005 Barium

### J. Generation Information

**Generating Process:** MINERALS, METALLICS, SILICA BINDER CLEAN UP AROUND MIX PIT THAT MAKES FLUX FOR WELDING RODS.

**Generation Rate:** 10 DM per QTR

# Envirite

## Waste Material Profile Sheet

Profile: 16344

03 JUL 2008

Page 3 of 4

### K. Waste Characteristics

- |  |  |   |
|--|--|---|
| Insecticides <input type="checkbox"/>    | <input type="checkbox"/>                         | Carcinogen <input type="checkbox"/>                             |
| Shock Sensitive <input type="checkbox"/> | Dioxin <input type="checkbox"/>                  | PCB's: <input type="checkbox"/>                                 |
| Pesticides <input type="checkbox"/>      | Pyrophoric <input type="checkbox"/>              | RX Cyanide >250ppm <input type="checkbox"/>                     |
| Herbicides <input type="checkbox"/>      | Household Waste: <input type="checkbox"/>        | RX Sulfide >500ppm <input type="checkbox"/>                     |
| Radioactive: <input type="checkbox"/>    | Crystalline Free Silica <input type="checkbox"/> | (Unless Checked) None Apply <input checked="" type="checkbox"/> |
| Medical Waste <input type="checkbox"/>   | Explosive <input type="checkbox"/>               | Other (specify) <input type="checkbox"/>                        |
| Oxidizers <input type="checkbox"/>       | Asbestos: <input type="checkbox"/>               |   |

Additional Informator

# Envirite

## Waste Material Profile Sheet

03 JUL 2008

Page 4 of 4

Profile: 16344

### L. Regulatory Characterization

- |   |   |
|---|---|
| <input type="checkbox"/> IS THIS A WASTEWATER PER 40CFR 268                 | <input type="checkbox"/> BY PRODUCT                                   |
| <input checked="" type="checkbox"/> IS THIS A NON-WASTEWATER PER 40 CFR 268 | <input type="checkbox"/> RX WITH LIME TO CREATE FLAM. GAS             |
| <input type="checkbox"/> UNIVERSAL WASTE                                    | <input checked="" type="checkbox"/> DOES NOT RX VIOLENTLY WITH LIME   |
| <input type="checkbox"/> CHARACTERISTIC SLUDGE                              | <input type="checkbox"/> CONTAINS VOCS OVER 500PPM                    |
| <input type="checkbox"/> VIRGIN UNUSED PRODUCT                              | <input checked="" type="checkbox"/> DOES NOT CONTAIN VOCS OVER 500PPM |
| <input checked="" type="checkbox"/> SPENT MATERIAL                          | <input type="checkbox"/> CONTAINS METALLIC FINES/POWDERS              |
| <input type="checkbox"/> WASTE HAS BEEN TREATED                             | <input type="checkbox"/> POLLUTION CONTROL WASTE (IL)                 |
| <input type="checkbox"/> CYANIDE PLATING ON SITE                            | <input type="checkbox"/> INDUSTRIAL PROCESS WASTE (IL)                |
| <input type="checkbox"/> SUBSTITUTE COMMERCIAL PRODUCT                      |   |

(Mark ALL conditions that apply, a blank response confirms the above condition(s) do not apply to this waste stream.)

*This form must be signed by a person authorized to represent the generator. If the individual signing the Waste Profile is a broker or other agent not employed by the generator of the waste, the generator must provide written notification (on generator letterhead) documenting the authority granted that individual.*

I authorize Envirite to make corrections to this waste profile. I understand that I will be required to confirm any changes in writing.  Yes  No

I hereby avow that any pertinent information that is known by the generator concerning possible hazards has been disclosed. I certify that, to the best of my knowledge, all statements and attachments are correct and accurate representations of this waste material.

Signee Name

Signee Date

Signee Title

ALAN JONES

7-10-08

PLANT ENGINEER

Signature

Alan Jones

Company

Special Metals Welding Products

Date of Sampling: \_\_\_\_\_

Time of Sampling: \_\_\_\_\_

AM/PM

Sampler Name: \_\_\_\_\_

Sampler Signature: \_\_\_\_\_

Title and Affiliation of Sampler: \_\_\_\_\_

# Envirite

## Waste Material Profile Sheet

Profile: 16344

03 JUL 2008

Page 1 of 4

<b>A. Profile Information</b>	
Profile: 16344	File Ref #: 10828
Common Description: BAG HOUSE DUST	

<b>B. Company Information</b>		
<b>Generator Address</b> Special Metals Welding Products 1401 Burris Road  Newton, NC 28658 NCD980841951 Contact: Alan Jones 828-465-0352 EXT211 828-465-0352 SIC:                      NAICS:	<b>Bill-To Address</b> Special Metals Welding Products 1401 Burris Road  Newton, NC 28658 NCD980841951 Contact: 828-465-0352	<b>Disposal Facility Address</b> Envirite of Pennsylvania, Inc. 730 Vogelsong Road  York, PA 17404 PAD010154045

<b>C. DOT Information</b>	
DOT Name: RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	
Container Type: DM	Container Size: 55

<b>D. Biennial/Annual Reporting Information</b>	
Source Code: G21	Form Code: W319

<b>E. Physical Properties</b>		
Color: Black	Odor: N/A	% Oil/Grease: 0

<b>FLASH POINT</b> <input type="checkbox"/> < 100 F <input type="checkbox"/> 100 - 139 F <input type="checkbox"/> > 140 F <input checked="" type="checkbox"/> > 200 F	<b>FREE LIQUIDS</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<b>PHASES</b> <input checked="" type="checkbox"/> SINGLE <input type="checkbox"/> DOUBLE <input type="checkbox"/> MULTI
<b>PHYSICAL STATE</b> <input type="checkbox"/> SOLID <input checked="" type="checkbox"/> POWDER <input type="checkbox"/> SLUDGE <input type="checkbox"/> LIQUID <input type="checkbox"/> LIQUID/SOLID	<b>pH</b> <input type="checkbox"/> < 2 <input type="checkbox"/> > 2 - < 4.9 <input checked="" type="checkbox"/> > 5 - < 9.9 <input type="checkbox"/> > 10 - < 12.4 <input type="checkbox"/> > 12.5	

<b>F. TCLP</b>		
<b>TCLP</b>		

	Actual Value		Reg. Level	UM		Actual Value		Reg. Level	UM
ARSENIC TCLP	5	<	5.0	MG/L	BARIUM TCLP	100	>	100.0	MG/L
CADMIUM TCLP	1	<	1.0	MG/L	CHROMIUM TCLP	5	<	5.0	MG/L
LEAD TCLP	5	<	5.0	MG/L	MERCURY TCLP	.2	<	0.2	MG/L
SELENIUM TCLP	1	<	1.0	MG/L	SILVER TCLP	5	<	5.0	MG/L
BENZENE TCLP	.5	<	0.5	MG/L	CARBON TETRACHLORIDE TCLP	.5	<	0.5	MG/L
CHLORDANE TCLP	.03	<	0.03	MG/L	CHLOROBENZENE TCLP	100	<	100.0	MG/L

# Envirite

## Waste Material Profile Sheet

03 JUL 2008

Page 2 of 4

Profile: 16344

CHLOROFORM TCLP	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
HEXACHLORO BENZENE TCLP	.13	<	0.13	MG/L	1,4-DICHLORO BENZENE 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
VINYL CHLORIDE TCLP	.2	<	0.2	MG/L					

### G. Underlying Haz. Constituents

	Value	UM
NONE		%

### H. Chemical Composition

Chemical	Low	High	UM
Other			
Barium	>	100	PPM
Bag House Dust	=	100	%

Is this a RCRA Hazardous waste per 40 CFR 261 or equivalent State Regulation? Yes  
 Is this a Listed Hazardous waste per 40 CFR 261 or equivalent State Regulation? No  
 Is this a Characteristic Hazardous waste per 40 CFR 261 or equivalent State Regulation? Yes

### I. Waste Codes

D005 Barium	
-------------	--

### J. Generation Information

**Generating** MINERALS, METALLICS, SILICA BINDER CLEAN UP AROUND MIX PIT THAT MAKES FLUX FOR WELDING RODS.  
**Process:**

**Generation Rate** 10 DM per QTR



# Envirite

## Waste Material Profile Sheet

Profile: 16343

03 JUL 2008

Page 3 of 4

### K. Waste Characteristics

- |  |  |   |
|--|--|---|
| Insecticides <input type="checkbox"/>    | <input type="checkbox"/>                         | Carcinogen <input type="checkbox"/>                             |
| Shock Sensitive <input type="checkbox"/> | Dioxin <input type="checkbox"/>                  | PCB's: <input type="checkbox"/>                                 |
| Pesticides <input type="checkbox"/>      | Pyrophoric <input type="checkbox"/>              | RX Cyanide >250ppm <input type="checkbox"/>                     |
| Herbicides <input type="checkbox"/>      | Household Waste: <input type="checkbox"/>        | RX Sulfide >500ppm <input type="checkbox"/>                     |
| Radioactive: <input type="checkbox"/>    | Crystalline Free Silica <input type="checkbox"/> | (Unless Checked) None Apply <input checked="" type="checkbox"/> |
| Medical Waste <input type="checkbox"/>   | Explosive <input type="checkbox"/>               | Other (specify) <input type="checkbox"/>                        |
| Oxidizers <input type="checkbox"/>       | Asbestos: <input type="checkbox"/>               |   |

Additional Information

**L. Regulatory Characterization**

<input type="checkbox"/> IS THIS A WASTEWATER PER 40CFR 268	<input type="checkbox"/> BY PRODUCT
<input checked="" type="checkbox"/> IS THIS A NON-WASTEWATER PER 40 CFR 268	<input type="checkbox"/> RX WITH LIME TO CREATE FLAM. GAS
<input type="checkbox"/> UNIVERSAL WASTE	<input checked="" type="checkbox"/> DOES NOT RX VIOLENTLY WITH LIME
<input type="checkbox"/> CHARACTERISTIC SLUDGE	<input type="checkbox"/> CONTAINS VOCS OVER 500PPM
<input type="checkbox"/> VIRGIN UNUSED PRODUCT	<input checked="" type="checkbox"/> DOES NOT CONTAIN VOCS OVER 500PPM
<input checked="" type="checkbox"/> SPENT MATERIAL	<input type="checkbox"/> CONTAINS METALLIC FINES/POWDERS
<input type="checkbox"/> WASTE HAS BEEN TREATED	<input type="checkbox"/> POLLUTION CONTROL WASTE (IL)
<input type="checkbox"/> CYANIDE PLATING ON SITE	<input type="checkbox"/> INDUSTRIAL PROCESS WASTE (IL)
<input type="checkbox"/> SUBSTITUTE COMMERCIAL PRODUCT	

(Mark ALL conditions that apply, a blank response confirms the above condition(s) do not apply to this waste stream.)

*This form must be signed by a person authorized to represent the generator. If the individual signing the Waste Profile is a broker or other agent not employed by the generator of the waste, the generator must provide written notification (on generator letterhead) documenting the authority granted that individual.*

I authorize Envirite to make corrections to this waste profile. I understand that I will be required to confirm any changes in writing.       Yes       No

I hereby avow that any pertinent information that is known by the generator concerning possible hazards has been disclosed. I certify that, to the best of my knowledge, all statements and attachments are correct and accurate representations of this waste material.

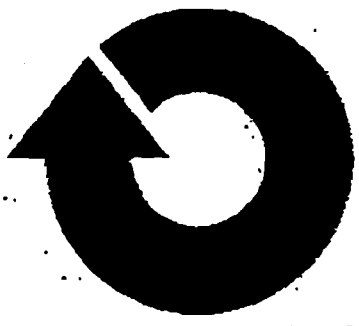
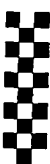
Signee Name	Signee Date	Signee Title
<u>ALAN JONES</u>	<u>7-10-08</u>	<u>PLANT ENGINEER</u>
Signature <u>Alan Jones</u>	Company <u>Special Metals Welding Products</u>	

Date of Sampling: \_\_\_\_\_ Time of Sampling: \_\_\_\_\_  
AM/PM

Sampler Name: \_\_\_\_\_

Sampler Signature: \_\_\_\_\_

Title and Affiliation of Sampler:  
 \_\_\_\_\_



# ENVIRITE

TECHNOLOGY FOR THE ENVIRONMENT

Envirite of Pennsylvania  
730 Vogelsong Road  
York, PA 17404

## FAX COVER SHEET

FAX No.: (717) 854-6757

Date: May 13, 2009

To: Hewitt Linyard

Company: Special Metals Welding Products

FAX Number: 828-465-3447

From: LAWREN WOOD

Envirite of Pennsylvania Telephone Number (717) 846-1900 Ext.: 203

Number of pages including this cover sheet: 6

Regarding: Manifests

If you do not receive the total number of pages transmitted, please call us as soon as possible at (717) 846-1900.

Time of Transmission: \_\_\_\_\_

Sent by: \_\_\_\_\_

→ let me know if you  
need anything else!  
Have a good day!

D12911

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NCD980841951	2. Page 1 of 1	3. Emergency Response Phone 828-464-0352	4. Manifest Tracking Number 001992371 FLE		
5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Generator's Phone: 828-465-0352				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Envirite of Pennsylvania, Inc.				U.S. EPA ID Number PAD010154045			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Envirite of Pennsylvania, Inc. 730 Vogelsohn Road York, PA 17404 Facility's Phone: 800-878-1618				U.S. EPA ID Number PAD010154045			
9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unil W/LVol.	13. Waste Codes	
		No.	Type				
X	1. RQ, Hazardous waste, liquid, n.o.s., 9, NA3082, PG III (D005)	003 JULY	DM	165	G	D005	
X	2. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	008 JULY	DM	6400	P	D005	
X	3. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	1	DM	100	P	D005	
	4.						
14. Special Handling Instructions and Additional Information 1. EW Approval # 16342 File Ref. # 14853 ERG 171 2. EW Approval # 16343 File Ref. # 10827 ERG 171 3. EW Approval # 16344 File Ref. # 10828 ERG 171 Box# Trailer # 3003Y							
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 252.27(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 Shannon Leil				Signature <i>Shannon Leil</i>		Month Day Year 4 7 09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: JAMES E. MILLER, JR. Signature: <i>James E. Miller</i> Month Day Year: 09 09 09 Transporter 2 Printed/Typed Name: Signature: Month Day Year:							
18. Discrepancy 18a. Discrepancy Indication Space: <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 3145 4958 723 Manifest Reference Number:							
18b. Alternate Facility (or Generator) Facility's Phone:				U.S. EPA ID Number			
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H111		2. H111		3. H111		4.	
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: Kirby E Newsum Signature: <i>Kirby E Newsum</i> Month Day Year: 10 9 09							

D 14371

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NCD980841951	2. Page 1 of 1	3. Emergency Response Phone 828-464-0352	4. Manifest Tracking Number 001992740 FILE		
5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Generator's Phone: 828-465-0352							Generator's Site Address (if different than mailing address)
6. Transporter 1 Company Name Envirite of Pennsylvania, Inc.					U.S. EPA ID Number PAD010154045		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address Envirite of Pennsylvania, Inc. 730 Vogelsong Road York, PA 17404 Facility's Phone: 800-878-1618					U.S. EPA ID Number PAD010154045		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	001	DM	EST 2000 P	P	D005	
X	RQ, Waste Flammable liquids, n.o.s. (Mainly Ethyl Ketone, Ethanol), 3, UN1993, PG II (D001 D035)	0	DM			D001 D035	
X	RQ, Hazardous waste, liquid, n.o.s., 9, NA3082, PG III (D005)	004	DM	EST 2800 P	P	D005	
X	RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	002	DM	EST 1400 P	P	D005	
14. Special Handling Instructions and Additional Information 1. EW Approval # 16344 File Ref. # 10828 ERG 171 2. EW Approval # 14922 File Ref. # 13463 ERG 126 3. EW Approval # 16342 File Ref. # 14853 ERG 171 4. EW Approval # 16343 File Ref. # 10827 ERG 171 ALL ARE ARE ESTIMATED 0'S SHIPPED Box # 3005 Y Trailer # 3005 Y							
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/Officer's Printed/Typed Name Willie Logan				Signature <i>Willie Logan</i>		Month Day Year 11 22 09	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> 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: JAMES E. MILLER, JR. Signature: <i>James E. Miller</i> Month Day Year: 01 22 09 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection L33# 3574# 1071# Manifest Reference Number: _____							
18b. Alternate Facility (or Generator) Facility's Phone: _____					U.S. EPA ID Number		
18c. Signature of Alternate Facility (or Generator) Month Day Year: _____							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. Hill		2. Hill		3. Hill		4.	
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: Kirby E. Newkirk Signature: <i>Kirby E. Newkirk</i> Month Day Year: 01 23 09							

D17558

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MLL0980841951	2. Page 1 of 1	3. Emergency Response Phone 828-464-0352	4. Manifest Tracking Number 001990976 FLE		
5. Generator's Name and Mailing Address SPECIAL METALS WELDING PRODUCTS 1401 BURRIS RD. HEWITON, NC 28658							
Generator's Phone 828-465-0352				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name ENVIATE OF PENNSYLVANIA, INC.				U.S. EPA ID Number PA0010154045			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address ENVIATE OF PENNSYLVANIA, INC. 930 VOYLESONS RD. YORK, PA 17404				U.S. EPA ID Number PA0010154045			
Facility's Phone 7178461900							
9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit W./Vol.	13. Waste Codes	
		No.	Type				
X	1. R.I.Q. HAZARDOUS WASTE LIQUID, UNID. 9, NA3082, P.III (D005)	002	DM	1600	P	D005	
X	2. R.I.Q. HAZARDOUS WASTE SOLID, UNID. 9, NA3011, P.III (D005)	003	DM	2400	P	D005	
X	3. R.I.Q. HAZARDOUS WASTE SOLID, UNID. 9, NA3011, III (D005)	001	DM	800	P	D005	
	4. UNIVERSAL WASTE, NON HAZARDOUS (SODIUM VAPOR BULBS)	001	DM	660	P		
14. Special Handling Instructions and Additional Information 981) EW #16342 - ER5 #471 983) EW #16344 - ER5 #471 982) EW #16343 - ER5 #471 984) EW #14937 18111							
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/Officer's Printed/Typed Name HEWITT LINDYARD				Signature <i>[Signature]</i>		Month Day Year 12 8 08	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: JAMES E MILLER, JR. Signature: <i>[Signature]</i> Month Day Year: 12 08 08							
Transporter 2 Printed/Typed Name: Signature: Month Day Year:							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input checked="" type="checkbox"/> Full Rejection 18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number: Facility's Phone: 18c. Signature of Alternate Facility (or Generator): Month Day Year:							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H111 2. H111 3. H111 4. H141							
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: KERRY E NEWSON Signature: <i>[Signature]</i> Month Day Year: 12 08 08							

D11433

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NCD980841951	2. Page 1 of 1	3. Emergency Response Phone 828-464-0352	4. Manifest Tracking Number 001993147 FLE		
5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burns Road Newton, NC 28658 Generator's Phone: 828-465-0352				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Envrite of Pennsylvania, Inc.				U.S. EPA ID Number PAD010154045			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Envrite of Pennsylvania, Inc. 730 Vogelsong Road York, PA 17404 Facility's Phone: 800-878-1618				U.S. EPA ID Number PAD010154045			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. RQ Waste Flammable liquids, n.o.s. (Methyl Ethyl Ketone, Ethanol), 3, UN1993, PG II (D001, D035)	062	DM	110	G	D001	D035
X	2. RQ Hazardous waste, liquid, n.o.s., 9, NA3082, PG III (D005)	07	DM	385	G	D005	
X	3. RQ Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	06	DM	330	G	D005	
X	4. RQ Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	02	DM	255 700 P	P	D005	
14. Special Handling Instructions and Additional Information A. EW Approval # 14822 File Ref. # YS4367 ERG 128 B. EW Approval # 16342 File Ref. # 14853 ERG 174 C. EW Approval # 16343 File Ref. # 10827 ERG 171 D. EW Approval # 16344 File Ref. # 10828 ERG 171							Box # Trailer # 30067
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 R. C. CATOE				Signature A. L. [Signature]		Month Day Year 11 14 08	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Allen Short				Signature Allen Short		Month Day Year 11 14 08	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 159# 192# 3495# 1325#							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H141		2. H111		3. H111		4. H111	
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 KIRBY E. KENSUOL				Signature [Signature]		Month Day Year 11 14 08	

D5075

D5077

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NCD980841954	2. Page 1 of 1	3. Emergency Response Phone 828-465-0352	4. Manifest Tracking Number 001586719 FLE		
5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Generator's Phone: 828-465-0352				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Envirite of Pennsylvania, Inc.				U.S. EPA ID Number PAD010154045			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Envirite of Pennsylvania, Inc. 730 Vogelsong Road York, PA 17404 Facility's Phone: 800-878-1618				U.S. EPA ID Number PAD010154045			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes	
		No.	Type				
X	1. RQ, Waste Flammable liquids, n.o.s. (Methyl Ethyl Ketone, Ethanol), 3, UN1993, PG I (D001, D035)	1	DM	0.50	P	D001	D035
X	2. RQ, HAZARDOUS WASTE LIQUID, n.o.s. 9, NAB002, P, III, (D005)	007	DM	6163	P	D005	
X	3. RQ, HAZARDOUS WASTE SOLID, n.o.s. 9, NAB001, P, III, (D005)	006	DM	3088	P	D005	
X	4. RQ, HAZARDOUS WASTE SOLID, n.o.s. 9, NAB001, P, III, (D005)	002	DM	1198	P	D005	
14. Special Handling Instructions and Additional Information EW Approval # 14922 File Ref. # YS4367 ERG 128 3.) EW 10827 (56810) 571 - SOLID Box# 2.) EW #10786 (55574) ERG #111 4.) EW 10828 (46809) 571 - DUST Trailer # #00242							
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/Officer's Printed/Typed Name ALAN JONES				Signature <i>Alan Jones</i>		Month Day Year 7 2 08	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: JAMES E. MILLER, JR. Signature: <i>James E. Miller</i> Month Day Year: 07/02/08 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 95 # 3352 # 6419 # 1056 # Manifest Reference Number: _____							
18b. Alternate Facility (or Generator) Facility's Phone: _____				U.S. EPA ID Number			
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H141		2. H111		3. H111		4. H111	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18c Printed/Typed Name: Kirby E. Newsnow Signature: <i>Kirby E. Newsnow</i> Month Day Year: 07/02/08							



2007

Haz Waste Volume Data for 2007

RCRA Biennial Haz. Waste Report

Summary

<u>our ref #</u>	<u>Vendor</u>	<u>Quantity</u>
225	Permapix	4,400 #
227	Enviroite	31,640 #
228	Enviroite	10,700 #
229	Enviroite	10,743
231	"	9,680
234	"	11,025
		<hr/>
		78,188

73,788

<p style="text-align: center;"><b>MAIL THE COMPLETED FORM TO:</b></p> <p>The Appropriate EPA Regional or State Office</p>	<p><b>United States Environmental Protection Agency</b></p> <p><b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b></p>								
<p><b>1. Reason for Submittal and Status of Information Supplied (see instructions on page 9)</b></p> <p style="text-align: center;">MARK ALL BOX(ES) THAT APPLY</p>	<p><b>A. Reason for Submittal:</b></p> <p><input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).</p> <p><input checked="" type="checkbox"/> To provide subsequent notification (to update site identification information).</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application.</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____).</p> <p><input checked="" type="checkbox"/> As a component of the Hazardous Waste Report.</p>								
<p><b>2. Site EPA ID Number (see instructions on page 10)</b></p>	<p><b>EPA ID Number:</b> NCD980841951</p>								
<p><b>3. Site Name (see instructions on page 10)</b></p>	<p><b>Name:</b> SPECIAL METALS WELDING PRODUCTS</p>								
<p><b>4. Site Location Information (see instructions on page 10)</b></p>	<p><b>Street Address:</b> 1401 BURRIS ROAD</p> <table style="width: 100%; border: none;"> <tr> <td style="border: none;"><b>City, Town, or Village:</b> NEWTON</td> <td style="border: none;"><b>State:</b> NC</td> </tr> <tr> <td style="border: none;"><b>County Name:</b> CATAWBA</td> <td style="border: none;"><b>Zip Code:</b> 28658-1754</td> </tr> </table>	<b>City, Town, or Village:</b> NEWTON	<b>State:</b> NC	<b>County Name:</b> CATAWBA	<b>Zip Code:</b> 28658-1754				
<b>City, Town, or Village:</b> NEWTON	<b>State:</b> NC								
<b>County Name:</b> CATAWBA	<b>Zip Code:</b> 28658-1754								
<p><b>5. Site Land Type (see instructions on page 10)</b></p>	<p><b>Site Land Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>								
<p><b>6. North American Industry Classification System (NAICS) Code(s) for the Site (see instructions on page 10)</b></p>	<table style="width: 100%; border: none;"> <tr> <td style="border: none;">A. 331491</td> <td style="border: none;">B.</td> </tr> <tr> <td style="border: none;">C.</td> <td style="border: none;">D.</td> </tr> </table>	A. 331491	B.	C.	D.				
A. 331491	B.								
C.	D.								
<p><b>7. Site Mailing Address (see instructions on page 11)</b></p>	<p><b>Street or P.O. Box:</b> 1401 BURRIS ROAD</p> <p><b>City, Town, or Village:</b> NEWTON <span style="float: right;"><b>State:</b> NC</span></p> <p><b>Country:</b> <span style="float: right;"><b>Zip Code:</b> 28658-1754</span></p>								
<p><b>8. Site Contact Person (see instructions on page 11)</b></p>	<table style="width: 100%; border: none;"> <tr> <td style="border: none;"><b>First Name:</b> ALAN</td> <td style="border: none;"><b>MI:</b> E</td> <td style="border: none;"><b>Last Name:</b> JONES</td> </tr> <tr> <td colspan="2" style="border: none;"><b>Phone Number:</b> (828) 465-0352 <b>Extension:</b> 211</td> <td style="border: none;"><b>Email:</b> AJONES@SMWPC.COM</td> </tr> </table>	<b>First Name:</b> ALAN	<b>MI:</b> E	<b>Last Name:</b> JONES	<b>Phone Number:</b> (828) 465-0352 <b>Extension:</b> 211		<b>Email:</b> AJONES@SMWPC.COM		
<b>First Name:</b> ALAN	<b>MI:</b> E	<b>Last Name:</b> JONES							
<b>Phone Number:</b> (828) 465-0352 <b>Extension:</b> 211		<b>Email:</b> AJONES@SMWPC.COM							
<p><b>9. Legal Owner and Operator of the Site (see instructions on pages 11 and 12)</b></p>	<table style="width: 100%; border: none;"> <tr> <td style="border: none;"><b>A. Name of Site's Operator:</b> SPECIAL METALS WELDING PRODUCTS</td> <td style="border: none;"><b>Date Became Operator (mm/dd/yyyy):</b> 11/26/2003</td> </tr> <tr> <td colspan="2" style="border: none;"><b>Operator Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</td> </tr> <tr> <td style="border: none;"><b>B. Name of Site's Legal Owner:</b> HUNTINGTON ALLOYS</td> <td style="border: none;"><b>Date Became Owner (mm/dd/yyyy):</b> 11/26/2003</td> </tr> <tr> <td colspan="2" style="border: none;"><b>Owner Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</td> </tr> </table>	<b>A. Name of Site's Operator:</b> SPECIAL METALS WELDING PRODUCTS	<b>Date Became Operator (mm/dd/yyyy):</b> 11/26/2003	<b>Operator Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		<b>B. Name of Site's Legal Owner:</b> HUNTINGTON ALLOYS	<b>Date Became Owner (mm/dd/yyyy):</b> 11/26/2003	<b>Owner Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
<b>A. Name of Site's Operator:</b> SPECIAL METALS WELDING PRODUCTS	<b>Date Became Operator (mm/dd/yyyy):</b> 11/26/2003								
<b>Operator Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other									
<b>B. Name of Site's Legal Owner:</b> HUNTINGTON ALLOYS	<b>Date Became Owner (mm/dd/yyyy):</b> 11/26/2003								
<b>Owner Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other									

9. Legal Owner (Continued) Address

Street or P.O. Box: 3200 RIVERSIDE DRIVE
City, Town, or Village: HUNTINGTON
State: WV Zip Code: 25706- Country:

10. Type of Regulated Waste Activity Mark 'X' in the appropriate boxes. Mark "Yes" or "No" for each choice. (See instructions on pages 13 to 16)

A. Hazardous Waste Activities Complete all parts for Items 1 through 6.

For Items 2 through 6, check all that apply:

- 1. Generator of Hazardous Waste If "Yes" choose only one of the following - a,b, or c.
a. LQG: Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or
c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

- 2. Transporter of Hazardous Waste
3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity
4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.

5. Exempt Boiler and/or Industrial Furnace

- a. Small Quantity On-site Burner Exemption
b. Smelting, Melting, Refining Furnace Exemption

In addition, indicate other generator activities (check all that apply)

- d. United States Importer of Hazardous Waste
e. Mixed Waste (hazardous and radioactive) Generator

6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 KG or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated (Managed) at your site. (check all boxes that apply)

- a. Batteries
b. Pesticides
c. Thermostats
d. Lamps
e. Other
f. Other
g. Other
Managed

2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities - Mark all boxes that apply

- 1. Used Oil Transporter If "Yes", mark each that applies.
a. Transporter
b. Transfer Facility
2. Used Oil Processor and/or Re-refiner - If "Yes", mark each that applies.
a. Processor
b. Re-refiner
3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer If "Yes", mark each that applies.
a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
b. Marketer Who First Claims the Used Oil Meets the Specifications

**11. Description of Hazardous Wastes (see instructions on page 17)**

**A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D005						

**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.


**12. Comments (see instructions on page 17)**


AJONES@SMWPC.COM

**13. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (see instructions on page 17)

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	D. Date Signed (mm-dd-yyyy)
	ALAN E JONES	03/28/2008
	PLANT ENGINEER	



U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
2007 Hazardous Waste Report

**FORM  
GM**

**WASTE GENERATION  
AND MANAGEMENT**

**SITE NAME**  
SPECIAL METALS WELDING PRODUCTS  
1401 BURRIS ROAD  
NEWTON, NC 286581754  
  
EPA ID NO: NCD980841951

Sec. 1	A. Waste Description BARIUM CONTAINING COMPOUND FROM WELDING FLUX MANUFACTURING		
B. EPA Hazardous Waste Code		D005	
C. State Hazardous Waste Code			
D. Source Code	G09	E. Form Code	W319
Management Method code for Source code G25		F. Quantity Generated in 2007	78,188.00
		G. UOM 1	0.00
		Density	lb./gal.

Sec. 2	Was any of this waste managed on-site?		No
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type	Quantity treated, disposed, or recycled on-site in 2007	On-site process system type	Quantity treated, disposed, or recycled on-site in 2007

Sec. 3	A. Was any of this waste shipped off site in 2007 for treatment, disposal, or recycling?			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	

Comments BAGHOUSE DUST; CLUMPS AND COARSE DUST; AQUEOUS SLURRY



U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
2007 Hazardous Waste Report

**FORM  
OI**

**OFF-SITE  
IDENTIFICATION**

**SITE NAME**  
SPECIAL METALS WELDING PRODUCTS  
BURRIS ROAD  
NEWTON NC 286581754  
  
EPA ID NO: NCD980841951

Form 1	A. EPA ID No. of off-site installation or transporter FLD980559728	B. Name of off-site installation or transporter PERMA-FIX OF ORLANDO
C. Handler Type  N Generator Y Transporter Y TSDR		D. Address of off-site installation Street 10100 ROCKET BOULEVARD  City ORLANDO State FL Zip 32824-

Form 2	A. EPA ID No. of off-site installation or transporter OHD980568992	B. Name of off-site installation or transporter ENVIRITE OF OHIO, INC
C. Handler Type  N Generator Y Transporter Y TSDR		D. Address of off-site installation Street 2050 CENTRAL AVENUE, SE  City CANTON State OH Zip 44707-

D 14371

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number NCD980841951	2. Page 1 of 1	3. Emergency Response Phone 828-464-0352	4. Manifest Tracking Number 001992740 FLE
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5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burnis Road Newton, NC 28658 Generator's Phone: 828-465-0352	Generator's Site Address (if different than mailing address)
---	--

6. Transporter 1 Company Name Envrite of Pennsylvania, Inc.	U.S. EPA ID Number PAD010154045
--	------------------------------------

7. Transporter 2 Company Name	U.S. EPA ID Number
-------------------------------	--------------------

8. Designated Facility Name and Site Address Envrite of Pennsylvania, Inc. 730 Vogelsohn Road York, PA 17404 Facility's Phone: 800-878-1618	U.S. EPA ID Number PAD010154045
---	------------------------------------

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
		No.	Type					
X	1. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	001	DM	EST 2000	P	D005		
X	2. RQ, Waste Flammable liquids, n.o.s., (Acetylene, Ethylene, Ethane), 2, UN1093, PG II (D001, D035)	0	DM			D001	D035	
X	3. RQ, Hazardous waste, liquid, n.o.s., 9, NA3082, PG III (D005)	004	DM	EST 2800	P	D005		
X	4. RQ, Hazardous waste, solid, n.o.s., 9, NA3077, PG III (D005)	002	DM	EST 1400	P	D005		

14. Special Handling Instructions and Additional Information 1. EW Approval # 16344 File Ref. # 10828 ERG 171 2. EW Approval # 14922 File Ref. # 1357 ERG 120 3. EW Approval # 16342 File Ref. # 14853 ERG 171 4. EW Approval # 16343 File Ref. # 10827 ERG 171 ALL ARE ARE ESTIMATES SHIPPED Box # Trailer # 3005Y
---

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/Offoror's Printed/Typed Name Willie Logan	Signature [Signature]	Month Day Year 11 22 09
--	--------------------------	----------------------------

16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:
--

17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name JAMES E. MILLER, JR. Signature [Signature] Month Day Year 11 22 09
--

18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 633# 3574# 1071#
---

18b. Alternate Facility (or Generator) Facility's Phone: U.S. EPA ID Number:
--

18c. Signature of Alternate Facility (or Generator) Month Day Year
---

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)			
1. H111	2. H111	3. H111	4.

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 KIRBY E. NESSIMON Signature [Signature] Month Day Year 11 23 09
---

ENVIRITE CORP.  
730 VOBELSONG ROAD  
YORK CITY INDUSTRIAL PARK  
YORK, PA. 17404  
PHONE (717) 846-1000

10:30 01/27/09

STREAM #

10344

#1 GROSS WT.

633 LBS.

TOTAL WT.

633 LBS.

10:32 01/27/09



ENVIRITE CORP.  
730 VOGELSONG ROAD  
YORK CITY INDUSTRIAL PARK  
YORK, PA. 17404  
PHONE (717) 646-1000

10:22 01/27/09

STREAM #

10342

#1 GROSS WT.	2071 LBS.
#2 GROSS WT.	545 LBS.
#3 GROSS WT.	958 LBS.

TOTAL WT.	3574 LBS.
-----------	-----------

10:27 01/27/09

ENVIRITE CORP.  
738 VOGELSONG ROAD  
YORK CITY INDUSTRIAL PARK  
YORK, PA. 17404  
PHONE (717) 846-1000

10:32 01/27/09

STREAM # 16343

BT GROSS WT. 1271 LBS.

TOTAL WT. 1271 LBS.

10:34 01/27/09

D17558

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number 1U60980841951	2. Page 1 of 1	3. Emergency Response Phone 828-464-0352	4. Manifest Tracking Number 001990976 FLE	
5. Generator's Name and Mailing Address SPECIAL METALS WELDING PRODUCTS 1401 BURRIS RD. NEWTON, NC 28658						
Generator's Phone: 828-464-0352						
6. Transporter 1 Company Name ENVIRITE OF PENNSYLVANIA, INC.				U.S. EPA ID Number PA0010154045		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address ENVIRITE OF PENNSYLVANIA, INC. 1730 VOSELS OAKS RD YORK, PA. 17404				U.S. EPA ID Number PA0010154045		
Facility's Phone: 717-846-1900						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
X	1. R.I.G. HAZARDOUS WASTE LIQUID, NOIS. 9, NAB082, P, III (D005)	002	DM	EST 1600	P	D005
X	2. R.I.G. HAZARDOUS WASTE SOLID, NOIS. 9, NAB010, P, III (D005)	003	DM	EST 2400	P	D005
X	3. R.I.G. HAZARDOUS WASTE SOLID, NOIS. 9, NAB010, III (D005)	001	DM	EST 800	P	D005
	4. UNIVERSAL WASTE, NON HAZARDOUS (SODIUM VAPOR BULBS)	001	DM	EST 060	P	
14. Special Handling Instructions and Additional Information 981) EW # 16342 - ER4 # 1/1 983) EW # 16344 - ER4 # 1/1 982) EW # 16343 - ER4 # 1/1 984) EW # 16345 - ER4 # 1/1						
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/Offero's Printed/Typed Name HEWITT LINDYARD				Signature <i>[Signature]</i>		Month Day Year 12 8 08
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name JAMES E MILLER, JR.				Signature <i>[Signature]</i>		Month Day Year 12 08 08
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H111		2. H111		3. H111		4. H141
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 K. E. E. HANSON				Signature <i>[Signature]</i>		Month Day Year 12 08 08

ENVIRITE CORP.  
730 VOGELSONG ROAD  
YORK CITY INDUSTRIAL PARK  
YORK, PA. 17404  
PHONE (717) 846-1900

13:34 12/13/00

STREAM #	16342
#1 GROSS WT.	1966 LBS.
TOTAL WT.	1966 LBS.

13:35 12/13/00

ENVIRITE CORP.  
730 VOGELSONG ROAD  
YORK CITY INDUSTRIAL PARK  
YORK, PA. 17404  
PHONE (717) 846-1000

13:31 12/13/08

STREAM #

16343

#1 GROSS WT.

1380 LBS.

#2 GROSS WT.

873 LBS.

TOTAL WT.

2253 LBS.

13:34 12/13/08

DE



ENVIRITE CORP.  
730 VOGELSONG ROAD  
YORK CITY INDUSTRIAL PARK  
YORK, PA. 17404  
PHONE (717) 846-1900

13:35 12/13/08

STREAM #

16344

#1 GROSS Wt.

666 LBS.

TOTAL WT.

666 LBS.

13:37 12/13/08

DE

ENVIRITE CORP.  
730 VOGELSONG ROAD  
YORK CITY INDUSTRIAL PARK  
YORK, PA. 17404  
PHONE (717) 846-1900

13:37 12/13/08

STREAM # 15111  
#1 GROSS WT. 82 LBS.  
TOTAL WT. 82 LBS.

13:42 12/13/08

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D5075 5077

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number NCD980841951	2. Page 1 of 1	3. Emergency Response Phone 828-465-0352	4. Manifest Tracking Number 001586719 FLE
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5. Generator's Name and Mailing Address Special Metals Welding Products 1401 Burris Road Newton, NC 28658 Generator's Phone: 828-465-0352	Generator's Site Address (if different than mailing address)
---	--

6. Transporter 1 Company Name Envrite of Pennsylvania, Inc.	U.S. EPA ID Number PAD010154045
--	------------------------------------

7. Transporter 2 Company Name	U.S. EPA ID Number
-------------------------------	--------------------

8. Designated Facility Name and Site Address Envrite of Pennsylvania, Inc. 730 Vogelsong Road York, PA 17404 Facility's Phone: 800-878-1618	U.S. EPA ID Number PAD010154045
---	------------------------------------

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes	
		No.	Type				
X	1. RO Waste Flammable liquids n.o.s. (Methyl Ethyl Ketone, Ethanol) 3. UN1893. PGII (D001.D035)	1	DM	050	P	D001	D035
X	2. LIQ. HAZARDOUS WASTE LIQUID, N.O.S. 9. NAR002, PGIII, (D005)	007	DM	6163	P	D005	
X	3. LIQ. HAZARDOUS WASTE SOLID, N.O.S., 9. NAR011, PGIII, (D005)	006	DM	3088	P	D005	
X	4. LIQ. HAZARDOUS WASTE SOLID, N.O.S., 9. NAR011, PGIII, (D005)	002	DM	1198	P	D005	

14. Special Handling Instructions and Additional Information EW Approval # 14922 File Ref. # YS4367 ERG 128 3.) EN10837 (CS6810) ER2 SOLID Box # 171 2.) EW # 10886 (CS5374) ER2 # 171 4.) EN10828 (CS6809) ER2 DUST Trailer # #00242
---

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/Offoror's Printed/Typed Name ALAN JONES	Signature <i>Alan Jones</i>	Month 7	Day 2	Year 05
--	--------------------------------	------------	----------	------------

16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.	Port of entry/exit: Date leaving U.S.:
--	---

17. Transporter Acknowledgment of Receipt of Materials				
Transporter 1 Printed/Typed Name JAMES E. MILLER, JR.	Signature <i>James E. Miller, Jr.</i>	Month 10	Day 02	Year 05
Transporter 2 Printed/Typed Name	Signature	Month	Day	Year

18. Discrepancy	
18a. Discrepancy Indication Space 95 # 3556 # 649 # 1286 #	<input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection
Manifest Reference Number:	U.S. EPA ID Number

18b. Alternate Facility (or Generator)	U.S. EPA ID Number
Facility's Phone:	
18c. Signature of Alternate Facility (or Generator)	Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)			
1. H141	2. H111	3. H111	4. H111

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 KERRY E. HENNING	Signature <i>Kerry E. Henning</i>	Month 07	Day 02	Year 18



# RCRA Site Detail

Report run on: May 6, 2009 - 7:40 AM

**NCD980841951 SPECIAL METALS WELDING PRODUCTS**

EPA Region:04 Extract Flag: Y Facility Identifier: County:CATAWBA

Universes Generator: LQG Transporter: N Active: Y  
 Operating TSD: --- IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: NC Source Type: Notification Seq. Number: 3 Receive Date: 31 MAR 2008

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location Address: 1401 BURRIS ROAD NEWTON, NC 28658	Mailing Address: 1401 BURRIS ROAD NEWTON, NC 28658 UNITED STATES
---	---

Contact Person For Source Information: ALAN E. JONES (828) 465-0352 ext. 211, AJONES@SMWPC.COM, 1401 BURRIS ROAD, NEWTON, NC 28658, UNITED STATES

Owner (current): HUNTINGTON ALLOYS, From: 11/26/2003 To: 3200 RIVERSIDE DRIVE, HUNTINGTON, WV 25706, HUNTINGTON, Type: Private, Phone:

Operator (current): SPECIAL METALS WELDING PRODUCTS, From: 11/26/2003 To: 1401 BURRIS ROAD, NEWTON, NC 28658-1754, NEWTON, Type: Private, Phone:

Latitude/Longitude Measure - Owner: Seq #: Coordinates: ,

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:  
 Accessibility: No. Employees: State District:

NAICS Codes: 331491 Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: NC-4 NC - STATE REGULATED

Other Hazardous Waste Generator Activities		Used Oil Activities	
Importer Activity:	No	Used Oil Transporter Activity	Off-Specification Used Oil Burner: No
Mixed Waste Generator:	No	Transporter: No	Used Oil Fuel Marketer Activity
Transporter Activity:	No	Transfer Facility: No	Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
TSD Activity:	No	Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications: No
Recycler Activity:	No	Processor: No	Refiner: No
Exempt Boiler and/or Industrial Furnace		Underground Injection Control: No	Destination Facility for Universal Waste: No
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	No		

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D005

Activity Location: NC Source Type: Biennial Report Seq. Number: 8 Receive Date: 28 MAR 2008 Report Cycle: 2007

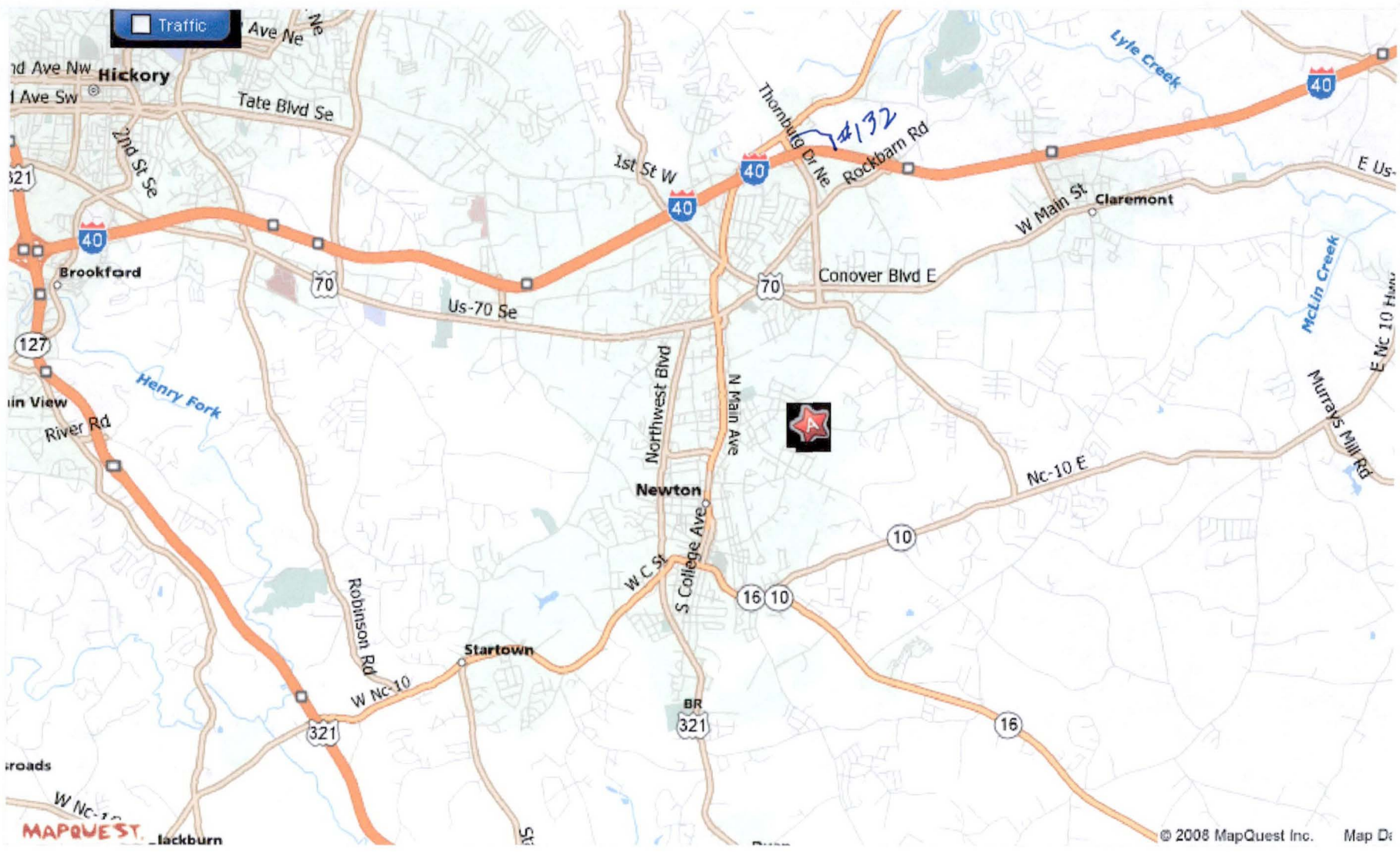
Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location Address: 1401 BURRIS ROAD NEWTON, NC 28658-1754	Mailing Address: 1401 BURRIS ROAD NEWTON, NC 28658-1754 UNITED STATES
--	--

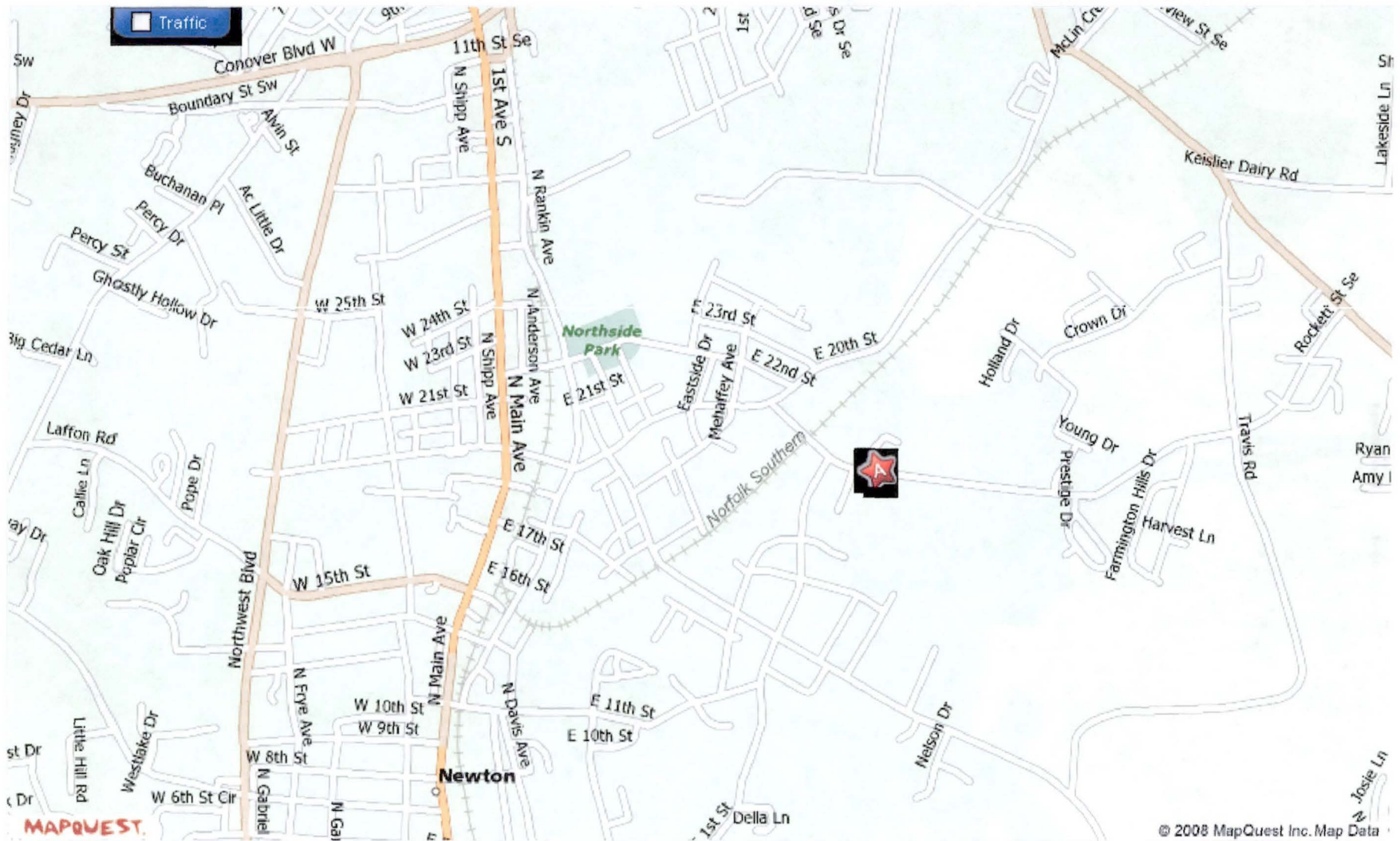
Contact Person For Source Information: ALAN E. JONES (828) 465-0352 ext. 211, AJONES@SMWPC.COM, UNITED STATES

Owner (current): HUNTINGTON ALLOYS, From: 11/26/2003 To: 3200 RIVERSIDE DRIVE, HUNTINGTON, WV 25706, HUNTINGTON, Type: Private, Phone:

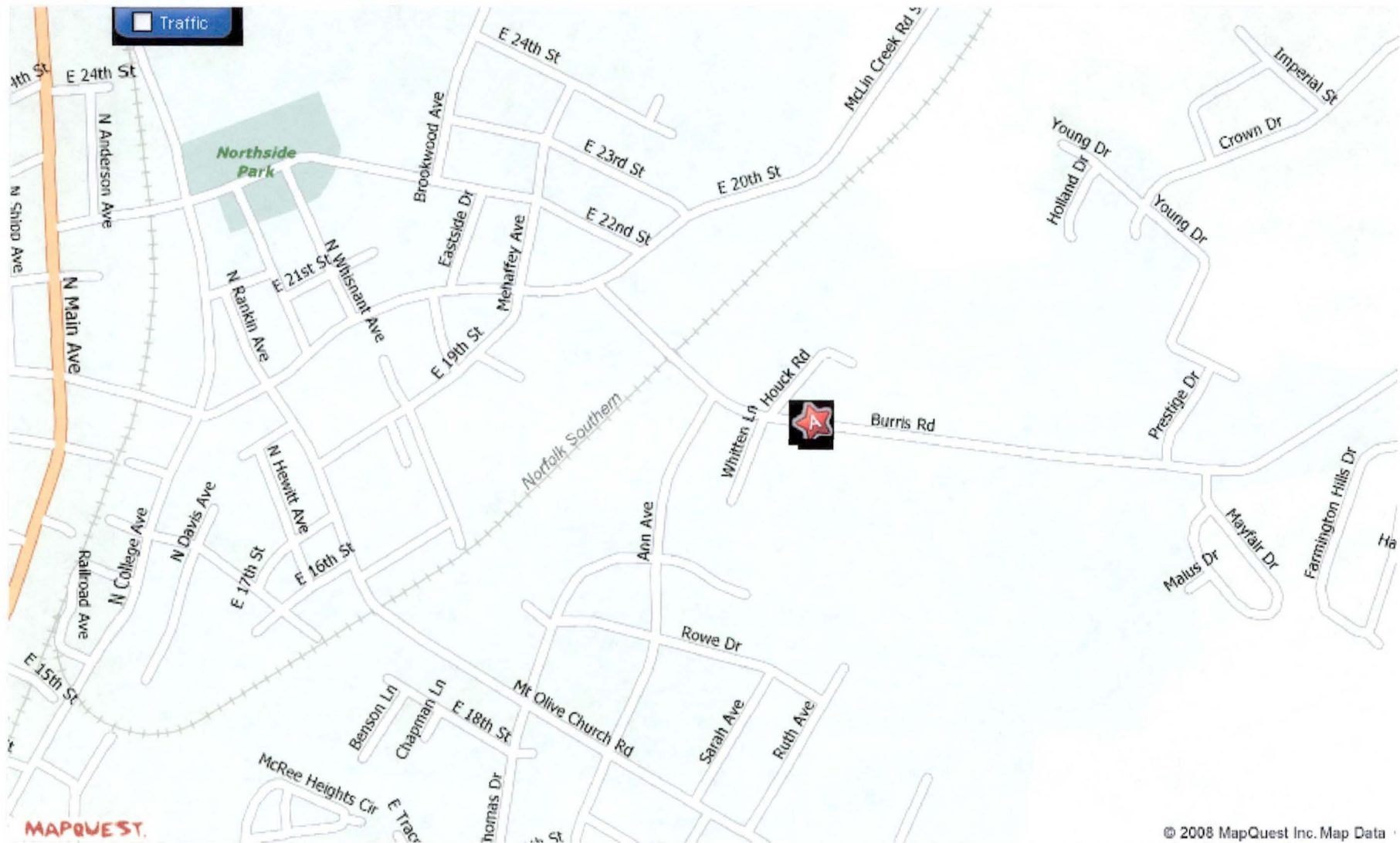
Operator (current): SPECIAL METALS WELDING PRODUCTS, From: 11/26/2003 To: Type: Private, Phone:



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- [Subdivision](#)
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Parcel Report - Catawba County, NC

<b>Parcel Information:</b>	<b>Owner Information:</b>
Parcel ID: <a href="#">374008797592</a>	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 <a href="#">Deed Image</a>	City: HUNTINGTON
Subdivision:	State/Zip: WV 25705-1737
Lots:	
Block:	
Last Sale: \$123,500 on 5/1/1984	
Plat Book/Page: 19/153	<b>School Information:</b>
Calculated Acreage: 14.45	School District: NEWTON CONOVER
Tax Map: 059N 02015F	Elementary School: <a href="#">THORNTON</a>
State Road: 1746	Middle School: <a href="#">NEWTON CONOVER</a>
Township: NEWTON	High School: <a href="#">NEWTON CONOVER</a>
<b>Tax/Value Information:</b> <a href="#">Tax Rates(pdf)</a>	<b>Zoning Information:</b>
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
<a href="#">Current Tax Bill</a>	<a href="#">Zoning Agency Phone Numbers</a>
<b>Miscellaneous:</b>	
Voter Precinct: <a href="#">P22</a>	Firm Panel Date: 9/5/2007
Building Code: COMMERCIAL or INDUSTRIAL	Firm Panel #:
<a href="#">Building Permits</a> for this parcel	2010 Census Tract: 011300
WaterShed:	2010 Census Block: 2005
WaterShed Split:	
<a href="#">Parcel Report Data Descriptions</a>	

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**Hazardous Waste Compliance Data Entry Form**

EPA ID Number: NCD 980-841-951

Facility Name: Spoom Metal Welding Products

Street: 1401 BORNIS ROAD

City: Newton NC ZIP: 28658-1754 County: Catawba

Contact Name: Alan Jones Phone#: 828-465-0352

EVALUATION DATA      New:       Change:       Delete:

Date: 5/27/2008      Evaluation Type: CSE

Date: 1/1      Evaluation Type: \_\_\_\_\_

Inspector ID #: 031

Evaluation Comments: Follow up Inspection  
IN Compliance

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 # N/A  
or  
 no longer a SNC (SNN evaluation)

**YES / NO      CSE ONLY**

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells
<u>Doos Barium</u>	<u>78.000# /yr.</u>		<u>500 yds.</u>	<u>75</u>	<u>NONE</u>	<u>N/A</u>

Date Determined: 4/16/2008

Branch: 01      Person: 031

Return to Compliance: 5/27/08      5/27/08  
Scheduled      Actual

Regulation Description: 40 CFR 265.37

Comment: Arrangements 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. **Facility Information:** 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. **Purpose of Inspection:** To determine compliance with deficiencies noted during the Compliance Assistance Inspection conducted on April 16, 2008.
6. **Report:**

**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:*

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115

Phone: 704-663-1699 \ FAX: 704-663-6040



*(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**

*27 May 08*  
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

**Subject:** "Green Cards" for Special Metals Welding Products contingency plan mailings  
**From:** "Alan Jones" <ajones@smwpc.com>  
**Date:** Fri, 23 May 2008 15:51:31 -0400  
**To:** <Steve.Barron@ncmail.net>

Steve,  
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

20080523154351667.pdf	<b>Content-Description:</b> 20080523154351667.pdf <b>Content-Type:</b> application/pdf <b>Content-Encoding:</b> base64
-----------------------	--



7002 2030 0001 3189 7786  
7002 2030 0001 3189 7786

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- Complete items 1, 2, 3, and 4 if Restricted
- Print your name and address so that we can return it to you or on the front if space permits
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1. Article Addressed to:  
 Mr. Dale Coffey  
 City of Newton  
 116 "A" Street  
 Newton, NC

2. Article Number  
 (Transfer from service)  
 PS Form 3811, February 2002

PS Form 3800, June 2002  
 PS Form 3811, February 2002  
 See Reverse for Instructions

City, State, ZIP+4<sup>®</sup>  
 Newton, NC 28658

Street, Apt. No., P.O. Box No.  
 116 "A" Street

Send To  
 DALE COFFEY - City of Newton

Total Postage & Fees	\$
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

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**DELIVERY**

- Agent
- Addressee

C. Date of Delivery

Item 1?  Yes  
 Item 2?  No

Mail Receipt for Merchandise

Yes

86

102595-02-M-1540



**Welding Products Company**

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 28658

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7002 2030 0001 3189 7793

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- Attach this card to the back of the package or on the front if space permits

1. Article Addressed to:  
 DAVID WELDON  
 CATAWBA COUNTY  
 EMERGENCY SERVICES  
 P.O. BOX 389  
 NEWTON, NC

2. Article Number  
 (Transfer from service label)

PS Form 3811, February 2002

PS Form 3800, June 2002  
 City, State, ZIP+4<sup>®</sup>  
 Newton, NC 28658  
 See Reverse for Instructions

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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BY \_\_\_\_\_

Agent  
 Addressee

Date of Delivery \_\_\_\_\_

Yes  
 No

\_\_\_\_\_ for Merchandise

Yes

102585-02-M-1540



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

MR. DAVID WELDON  
 CATAWBA COUNTY EMERGENCY SVCS.  
 P.O. BOX 389  
 NEWTON, NC 28658

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7002 2030 0001 3189 7809

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- Attach this card to the back of the envelope

1. Article Addressed to:  
 Donald Brown -  
 City of Newton  
 P.O. Box 550  
 Newton, NC 28658

2. Article Number  
 (Transfer from service label)

PS Form 3811, February 2004

PS Form 3800, June 2002  
 See Reverse for Instructions  
 Sent To  
 Street, Apt. No.,  
 or PO Box No. P.O. Box 550  
 City, State, Zip+4 Newton NC 28658  
 City of Newton

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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Agent  
 Addressee  
 Date of Delivery

Yes  
 No

Merchandise  
 Yes

02595-02-M-1540



**Welding Products Company**

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

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

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7002 2030 0001 3189 7816

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1. Article Addressed to:  
*James Rumley  
City of Newton  
Wastewater Treatment Plant  
P.O. Box 55  
Newton, NC*

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2002

PS Form 3800, June 2002

Send to:  
Street apt. No. or PO Box No.  
*James Rumley - City of Newton  
P.O. Box 550  
Newton, NC 28658*

City, State, Zip  
*Newton, NC 28658*

See Reverse for Instructions

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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Signature of Addressee

Agent  
 Addressee

Date of Delivery

17  Yes  
 No

Signature of Agent for Merchandise

Yes

102595-C2-M-1540



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

*Mr. James Rumley  
City of Newton Wastewater Treatment Plant  
P.O. Box 550  
Newton, NC, 28658*

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7002 2030 0001 3189 7823

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the back so that we can return the card to you.
- Attach this card to the back of the mail or on the front if space permits.

1. Article Addressed to:

Dale Greer  
Catawba Memorial Hospital  
810 Fairgrove Church Road  
Hickory, NC 28602

2. Article Number

(Transfer from service label)

PS Form 3811, February 2004

PS Form 3800, June 2002

See Reverse for Instructions

Sent to: Dale Greer - Catawba Memorial  
Street, Apt. No.: 810 Fairgrove Church Road  
or PO Box No.:  
City, State, ZIP+4: Hickory, NC 28602

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

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3500  
Delivery  
1540



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

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7002 2030 0001 3189 7830

<b>SENDER: COMPLETE THIS SECTION</b>		<b>U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT</b> <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
<ul style="list-style-type: none"> <li>Complete Items 1, 2, and 3. Attach item 4 if Restricted Delivery is required.</li> <li>Print your name and address so that we can return the card to you.</li> <li>Attach this card to the back of the envelope or on the front if space permits.</li> </ul>		<b>OFFICIAL USE</b> For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
1. Article Addressed to:  Gary Sparts STAT, Inc P.O. Box 1443 Lenoir, NC 28645		Agent Addressee of Delivery  Yes No	
2. Article Number <i>(Transfer from service label)</i>		Merchandise  Yes	
PS Form 3811, February 2004		PS-02-M-1540	

PS Form 3800, June 2002  
 Sent To: Gary Sparts - STAT, Inc.  
 Street, Apt. No.: P.O. Box 1443  
 or PO Box No.:  
 City, State, ZIP+4: Lenoir NC 28645  
 See Reverse for Instructions

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Registered Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here



**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®





7002 2030 0001 3189 7861  
7002 2030 0001 3189 7861

**SENDER: COMPLETE**

- Complete items 1, 2, Item 4 if Restricted Delivery
- Print your name and so that we can return
- Attach this card to the front or on the front if space

1. Article Addressed to:  
Stephen Barron  
NC DENR  
Hazard Waste  
610 East Center Avenue  
Mooresville,

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2002

PS Form 3800, June 2002

Send to: Stephen Barron - NC DENR - Hazard Waste  
Street Address: 610 East Center Avenue  
City, State, ZIP+4: MOORESVILLE, NC 28115

Return Receipt Fee (Endorsement Required)  
Restricted Delivery Fee (Endorsement Required)

Postage \$  
Certified Fee \$  
Total Postage & Fees \$

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DELIVERY

Agent  
 Addressee

C. Date of Delivery

Item 1?  Yes  
How?  No

Receipt for Merchandise  Yes

102595-02-M-1540



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

Mr. Stephen Barron  
NC DENR - Hazard Waste Section  
610 East Center Avenue  
Mooresville, NC 28115  
INCONEL<sup>®</sup>, MONEL<sup>®</sup>, NI-ROD<sup>®</sup>, INCOLOY<sup>®</sup>, NIMONIC<sup>®</sup>, INCO-WELD<sup>®</sup>, INCOFLUX<sup>®</sup>, NILO<sup>®</sup>

7921 7896 7000 2030 2002

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NEWTON, NC 28658  
**OFFICIAL USE**

Postage	\$ 1.85	0613
Certified Fee	\$2.70	11
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 46.75	05/23/2008

Sent To DALE COFFEY - City of Newton  
 Street, Apt. No. or PO Box No. 116 "A" Street  
 City, State, ZIP+4 Newton, NC 28658  
 PS Form 3800, June 2002 See Reverse for Instructions

7921 7896 7000 2030 2002

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NEWTON, NC 28658  
**OFFICIAL USE**

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Certified Fee	\$2.70	11
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 46.75	05/23/2008

Sent To James Rumley - City of Newton  
 Street, Apt. No. or PO Box No. P.O. Box 550  
 City, State, ZIP+4 Newton, NC 28658  
 PS Form 3800, June 2002 See Reverse for Instructions

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NEWTON, NC 28658  
**OFFICIAL USE**

Postage	\$ 1.85	0613
Certified Fee	\$2.70	11
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 46.75	05/23/2008

Sent To David Weldon - Catawba County  
 Street, Apt. No. or PO Box No. P.O. Box 389  
 City, State, ZIP+4 Newton, NC 28658  
 PS Form 3800, June 2002 See Reverse for Instructions

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HICKORY, NC 28602  
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Certified Fee	\$2.70	11
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 46.75	05/23/2008

Sent To Dale Greer - Catawba Memorial  
 Street, Apt. No. or PO Box No. 810 Fairgrave Church Road  
 City, State, ZIP+4 Hickory, NC 28602  
 PS Form 3800, June 2002 See Reverse for Instructions

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NEWTON, NC 28658  
**OFFICIAL USE**

Postage	\$ 1.85	0613
Certified Fee	\$2.70	11
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 46.75	05/23/2008

Sent To Donald Brown - City of Newton  
 Street, Apt. No. or PO Box No. P.O. Box 550  
 City, State, ZIP+4 Newton, NC 28658  
 PS Form 3800, June 2002 See Reverse for Instructions

7921 7896 7000 2030 2002

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**OFFICIAL USE**

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Certified Fee	\$2.70	11
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 46.75	05/23/2008

Sent To Gary Sparts - STAT, Inc.  
 Street, Apt. No. or PO Box No. P.O. Box 1443  
 City, State, ZIP+4 Lenoir, NC 28645  
 PS Form 3800, June 2002 See Reverse for Instructions

7002 2030 0001 3189 7867

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MOORESVILLE, NC 28115  
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Postage	\$	\$1.85
Certified Fee		\$2.70
Return Receipt Fee (Endorsement Required)		\$2.20
Restricted Delivery Fee (Endorsement Required)		\$0.00
<b>Total Postage &amp; Fees</b>	<b>\$</b>	<b>\$6.75</b>

0613  
11  
Postmark  
Here  
05/23/2008

Sent To  
*Stephen Barron - NCDENR - Haz Waste*  
Street Apt. No.  
or PO Box No. *610 East Center Avenue*  
City, State, ZIP+4  
*MOORESVILLE, NC 28115*

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to:		B. Received by (Printed Name)	C. Date of Delivery
Alan Jones, Plant Engineer Special Metals Welding Products 1401 Burris Road Newton, NC 28658-1754			4-23-10
2. Article Number (Transfer from service label)		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
7007 2680 0003 0885 2581		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
PS Form 3811, February 2004		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
Domestic Return Receipt		102595-02-M-1540	

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)		
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>		
OFFICIAL USE		
Postage	\$ 0.97	0028
Certified Fee	\$ 2.65	05
Return Receipt Fee (Endorsement Required)	\$ 2.15	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
Total Postage & Fees	\$ 5.77	04/22/2008
Sent To		
Street, Apt. No., or PO Box No.		
City, State, ZIP+4		
PS Form 3800, August 2006		See Reverse for Instructions





## 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**

April 21, 2008

1. **Facility Information:** 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:** Alan Jones, Stephen Barron
4. **Date of Inspection:** April 16, 2008
5. **Purpose of Inspection:** 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.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115

Phone: 704-663-1699 \ FAX: 704-663-6040

## **8. Areas of Inspection:**

- **Manifests**

- 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.
- Transporter: Envirote of Ohio OHD 980 568 992
- TSD: Envirote of Ohio OHD 980 568 992

- **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 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.
- 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.

- Contingency Plan
  - The facility has not completed and documented arrangements with local emergency facilities.
  - 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
  - The annual RCRA fees were paid on 13AUG07.
  
- Waste Minimization Plan
  - The Waste Minimization plan was located on site and was reviewed.
  
- Accumulation Areas
  - There were 6 satellite accumulation areas at the facility.
  - The satellite accumulation area consisted one closed head 55 gal. container.
  - Containers were labeled correctly.
  - Containers were closed.
  
- Hazardous Waste Storage Areas:
  - There was one hazardous waste storage area at the facility, located at the Rear Pad area.
  - 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.

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 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.*

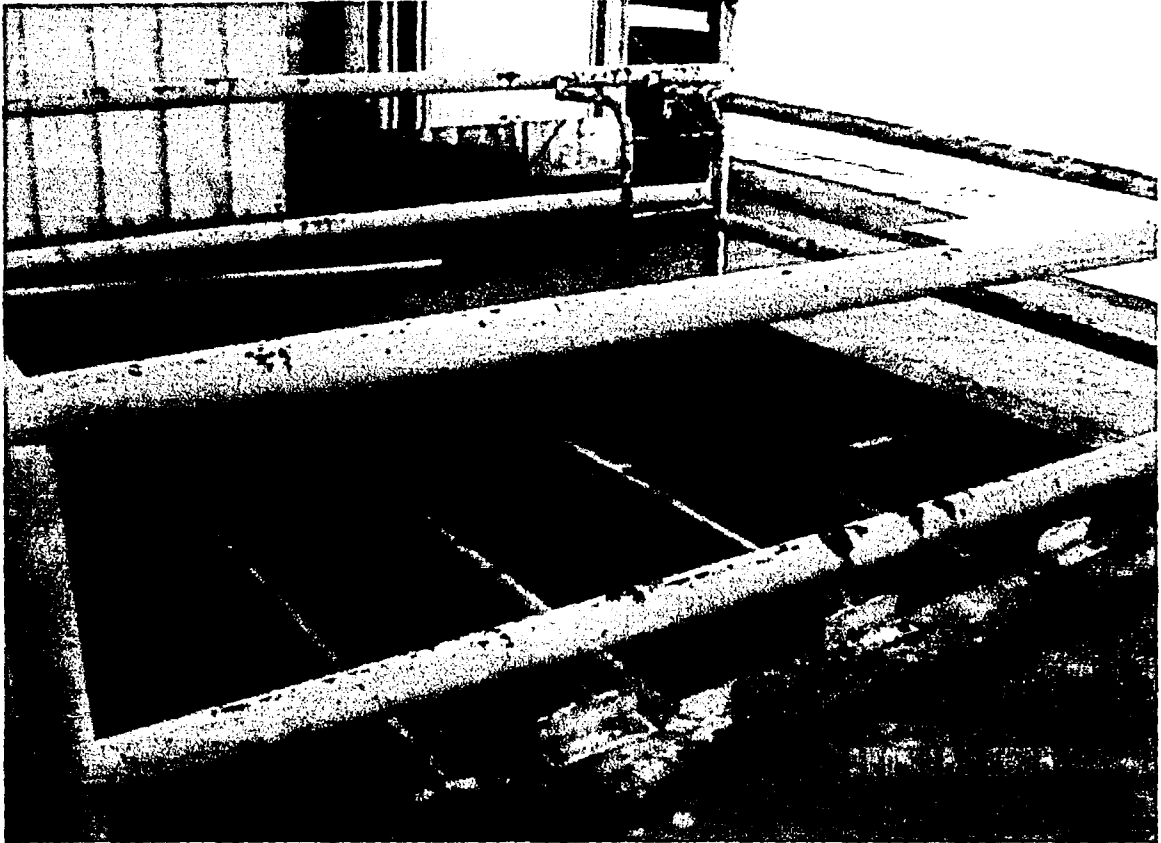
*(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.*

**Special Metals Welding Products is in violation of this regulation in arrangements with local emergency authorities have not made or documented.**

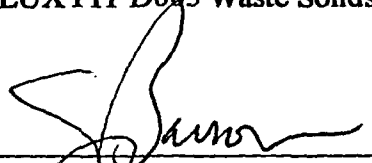
**Special Metals Welding Products must make and document arrangements for services with emergency authorities and contractors.**

**10. Comments/Recommendations:**

- Digital photos were taken during the inspection.



**FLUX PIT D005 Waste Solids/ Water to POTW**

  
**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



## 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;*

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*(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.

610 East Center Avenue, Suite 301, Mooresville, North Carolina 28115

Phone: 704-663-1699 | FAX: 704-663-6040

21 April 08  
(Date)

  
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

Time Arrived 9:30 am  
Inspection Date 16 April

**RCRA INSPECTION REPORT - LQG**

Facility Name: Special Metals Welding Products  
Mailing Address: 1401 Bruner Rd. Newton 28658  
EPA ID#: NCID 980-841-951 Phone Number: 828-465-0352  
Contact/Title: ALAN JONES. X 211  
Last Inspection: 1/06 Status: LQG Type of Inspection: CAI  
Present at Inspection: \_\_\_\_\_

**Check Manifest to determine the category of generator**  
\_\_\_\_ CESQG < 220# (1/2 drum) month, 2,200# Max (5 1/2 drums)  
\_\_\_\_ SQG >220# (1/2 drum) month <2200 # (5 1/2 drums) Max 13,200# (33 drums)  
 **LQG** >2200# (5 1/2 drums) month

Facility Description/Processes/# Employees: 75 employees  
Number of Building (1) Mfg welding Rods. Mig/TIG.

Wastes Generated 5005 Barium  
Nearest Residence 500 yd. POTW or Sewer City Water  
NPDES

**1- MANIFESTS:**  
Transporters: (Names & EPA ID)  
ENVIRITE OF OHIO OHD 980 565 992

TSDs (Names & EPA ID)  
ENVIRITE of OHIO. OHD 980-568-992

Signed Copies?  Filled out correctly?   
Treatment Standards?  Land ban notification?

- **PART 262 SUBPART B-THE MANIFEST:** \*COMPLIANCE YES/NO \_\_\_\_\_  
Manifests required for all hazardous waste shipped off site. They must include necessary signatures as stated in 262.20.  
a) Record all TSD and Transporters used.  
b) Check weights against LQG volumes. >2220 lbs  
c) Sign delivery copy back and filed within 35 days. Exception Report in 45 days.  
d) Land bans forms attached (one time notifications if waste stream does not change)

Solid D005  
Liquid D005

Drum 55.95 1262 P.  
4684 P.  
Drums. 60 5415 P  
- Tanker

Universal Waste

Waste Container D001 + D035 New Waste Stream

(D005 - 2007 Bi. Report.  
78.188 #)

• LDR CERTIFICATION 268.7 (a) (4)

\*COMPLIANCE YES/NO

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)

\*COMPLIANCE YES/NO

Generators must use approved TSD's and Transporters with valid EPA ID numbers.

**2 - WASTE MINIMIZATION PLAN ON-SITE**

\*COMPLIANCE YES/NO

- 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**

\*COMPLIANCE YES/NO

- a) Manifest must be kept for three years ✓
- b) Biennial Reports must be kept for three years. Submitted? 3/28/2008
- 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**

\*COMPLIANCE YES/NO

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: Rec

Storage Area 3: Area

**5 - ARRANGEMENTS WITH LOCAL AUTHORITIES-265.37**

\*COMPLIANCE YES/NO

- (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



**6 - CONTINGENCY PLAN-265.51**

\*COMPLIANCE YES/NO \_\_\_\_\_

- 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 \_\_\_\_\_

- 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 \*COMPLIANCE YES/NO \_\_\_\_\_

- 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 \*COMPLIANCE YES/NO \_\_\_\_\_

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 yes, was it adequate?)

Description of Emergency Equip? \_\_\_\_\_

Addresses of Emergency Coordinator? \_\_\_\_\_

Evacuation Plan? \_\_\_\_\_

Emergency Procedures Described? \_\_\_\_\_

Agreements with Emergency Responders? \_\_\_\_ (documented or stated in contingency plan?)

*No major incidents.*

**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 be designed to ensure that personnel can respond properly to emergencies.
- b) Personnel must complete the training within six months of their 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	Training Date	Prev Date
Charlie Stringfield	Electro	Electro		5/10/07	27 April 07
Chris Rayfield	"	Press Helper		S	J
Shane McSweeney	Team Leader				

8 - EMERGENCY PROCEDURES 265.56

\*COMPLIANCE YES/NO

- 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:**

Facility Maintained and Operated to Prevent Releases? ✓

Internal Communications or Alarm Present? Internal Alarm / Pull Boxes for Evac.

All Equipment/Alarms Tested and Maintained? Annually ✓

Has an emergency event place? \_\_\_\_\_

Describe: They employ home Radios.

ADT monthly      Spill Cart in Shop

+ Annually

Facility Tour

**1 - STORAGE AREAS**

- **MAXIMUM STORAGE TIME-262.34 (a)**

**\*COMPLIANCE YES/NO** \_\_\_\_\_

90 days or less.

- **CONTAINER DATES-262.34 (a) (2)**

**\*COMPLIANCE YES/NO** \_\_\_\_\_

Containers must be dated when accumulation begins.

- **LABELING-262.34 (a) (3)**

**\*COMPLIANCE YES/NO** \_\_\_\_\_

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 CONTAINERS-265.171**

**\*COMPLIANCE YES/NO** \_\_\_\_\_

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**

**\*COMPLIANCE YES/NO** \_\_\_\_\_

(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**

**\*COMPLIANCE YES/NO** \_\_\_\_\_

Containers holding ignitable or reactive waste must be located at least 50 feet from facility's property line

Stored in a 4 Drum Plastic Spill Box

**STORAGE AREAS:**

Name of Area: 1 Rear Pad. Acc. Area Drums.  
Number of Containers and Dates: 7 Drums  
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? Radio  
Fire Extinguish and/or Fire Control Equip?  Waste Compatible?   
Maintenance of fire extinguish /equip (frequency/company) monthly  
Spill Control Equipment: \_\_\_\_\_

**Storage Area(s):**

Name of Area: In Ground Pit / ~~Ants~~ Shamrock - Super Sucker  
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: \_\_\_\_\_

**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** (6)

Name/Location	Description (including at or near)	Closed?	<55gal	Labeled?	Releases?
2/TIG	Some metal containers	✓	✓	✓	✓
1. Electrodes					
Hoffman Band/pipe		✓	✓	✓	✓
Tire filter		✓	✓	✓	✓
Flux Brushes		✓	✓	✓	✓

Flux Pit. (Doos) (Annual Clean 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.
- f) No spillage.

**3 - UNIVERSAL WASTE 273**

Maint Shop @ TIG.

COMPLIANCE YES/NO \_\_\_\_\_

**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

Green Tubes  
MAY last year

Some Black Resin

**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.

SOME

COMPLIANCE YES/NO \_\_\_\_\_

✓

Nelson Oil.

Waste Streams  
MEK - 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 HAZ

**Site Deficiencies:** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Recommendations:** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NONE

**Subpart BB  
Inspection Requirements**

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.

265.1057 (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:**

265.1058 (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 designated 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)
5. Annual inspection for visible cracks, holes, or gaps on tank roof. Damaged seals or gaskets on closure devices. An inspection log must be maintained. \_\_\_\_\_ 265.1085 (c)(4)

**Subpart J:**

1. 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)  
or  
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

Company Name: Special Metals Welding Prod.  
EPA ID Number: NCI 980-841-951  
Date: 16 April 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.~~ *JB*
3. ~~Records of weekly inspection of drip pads (and after storms).~~ *JB*
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.
7. 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.**

Signature: *Alan Jones*  
Facility Contact or Representative  
Inspection Date: 4-16-08

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>NCDF0841931</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>928-465-0352</b>	4. Manifest Tracking Number <b>001595933 FILE</b>			
5. Generator's Name and Mailing Address <b>Special Metals Welding Products 1401 Harris Road Newton, NC 28658</b>			Generator's Site Address (if different than mailing address)					
Generator's Phone: <b>(828) 465-0352</b>								
6. Transporter 1 Company Name <b>Enviro of Ohio Inc.</b>			U.S. EPA ID Number <b>OH090568992</b>					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address <b>Enviro of Ohio, Inc. 2050 Central Ave SE Canton, OH 44707</b>			U.S. EPA ID Number <b>OH090568992</b>					
Facility's Phone: <b>(800) 715-5885</b>								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes	
	<b>X</b>	<b>1. RQ, Hazardous Waste Liquid, n.o.s., P, NA302, PG III (D015)</b>	<b>1</b>	<b>CM</b>	<b>15</b>	<b>5</b>	<b>D085</b>	
		<b>2.</b>						
		<b>3.</b>						
		<b>4.</b>						
14. Special Handling Instructions and Additional Information <b>Spill Profile # 14931 - ERG #171 Ref # 00938</b>								
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/Offero's Printed/Typed Name <b>ALAN JONES</b>					Signature <i>Alan Jones</i>		Month Day Year <b>4   11   08</b>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name <b>SCOTT SAURGE</b>					Signature <i>Scott Saurge</i>		Month Day Year <b>4   11   08</b>	
Transporter 2 Printed/Typed Name					Signature		Month Day Year	
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Manifest Reference Number:								
18b. Alternate Facility (or Generator)							U.S. EPA ID Number	
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)							Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems):								
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 Day Year	

# RCRA Site Detail

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

## NCD980841951 SPECIAL METALS WELDING PRODUCTS

EPA Region 04 Extract Flag: N Facility Identifier: County: CATAWBA

Universes Generator: LQG Transporter: N Active: Y  
 Operating TSDF: — IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: NC Source Type: Other - B Seq. Number: 2 Receive Date: 26 APR 2006 Report Cycle: 2005

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658-1754

Mailing 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658-1754  
 UNITED STATES

Contact Person ALAN E. JONES UNITED STATES  
 For Source (828) 465-0352 ext. 211  
 Information AJONES@SMWPC.COM

Owner (current) 3200 RIVERSIDE DRIVE Type: Private  
 HUNTINGTON ALLOYS HUNTINGTON, WV 25706  
 From: 11/26/2003 To: HUNTINGTON Phone:

Operator (current) 1401 BURRIS ROAD Type: Private  
 SPECIAL METALS WELDING PRODUCTS NEWTON, NC 28658-1754  
 From: 11/26/2003 To: NEWTON Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:  
 Accessibility: No. Employees: State District:

NAICS Codes: 331491 Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding

Notes: NC

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: NC-4 NC - STATE REGULATED

Transfer Facility:

### Used Oil Activities

Other Hazardous Waste Generator Activities	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity: No	Transporter: No	Used Oil Fuel Marketer Activity	
Mixed Waste Generator: No	Transfer Facility: No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Transporter Activity: No	Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	No
TSD Activity: No	Processor: No		
Recycler Activity: No	Refiner: No		
Exempt Boiler and/or Industrial Furnace			
Small Quantity Onsite Burner Exemption: No	Underground Injection Control: No	Destination Facility for Universal Waste:	No
Smelting, melting, Refining Furnace Exemption: No			

### Universal Waste Activities:

Description	Generated	Accumulated/Managed
Batteries	N	N
Lamps	N	N
Pesticides	N	N
Mercury containing equipment	N	N

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D005

### Biennial Report Information

No Biennial Report detail information available.

Activity Location: NC Source Type: Other - B Seq. Number: 1 Receive Date: 26 MAR 2004 Report Cycle: 2003

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS

Location 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658

Mailing 1401 BURRIS ROAD  
 Address: NEWTON, NC 28658  
 UNITED STATES

# RCRA Site Detail

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

## NCD980841951 SPECIAL METALS WELDING PRODUCTS

Continued...

**Contact Person** ALAN E. JONES UNITED STATES  
**For Source Information** (828) 465-0352 ext. 211  
 AJONES@IAIWPC.COM

**Owner (current)** 3200 RIVERSIDE DRIVE Type: Private  
 HUNTINGTON ALLOYS HUNTINGTON, WV 25706 Phone:  
 From: 11/26/2003 To: HUNTINGTON  
 Notes: Owner name change resulted from emergence from Chapter 11 Bankruptcy

**Operator (current)** 1401 BURRIS ROAD Type: Private  
 SPECIAL METALS WELDING PRODUCTS NEWTON, NC 28658 Phone:  
 From: 11/26/2003 To: NEWTON  
 Notes: Operator name changed due to emergence from Chapter 11 Bankruptcy proceedings. Former name is Inco Alloys International, Inc.

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:

Accessibility: No. Employees: State District:

NAICS Codes: 331491 Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding

Notes: NC

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: NC-4 NC - STATE REGULATED

Transfer Facility:

### Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Importer Activity: No  
 Mixed Waste Generator: No

Transporter: No  
 Transfer Facility: No

Used Oil Fuel Marketer Activity

Transporter Activity: No

Used Oil Processor and/or  
 Re-refiner Activity

Marketer who directs shipment  
 off-specification used oil to  
 off-specification used oil burner: No

TSD Activity: No

Recycler Activity: No

Processor: No  
 Refiner: No

Marketer who first claims the used  
 oil meets the specifications: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No  
 Smelting, melting, Refining Furnace  
 Exemption: No

Underground  
 Injection Control: No Destination Facility for  
 Universal Waste: No

### Universal Waste Activities:

Description	Generated	Accumulated/ Managed
Batteries	N	N
Lamps	N	N
Pesticides	N	N
Mercury containing equipment	N	N

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D005, D008

### Biennial Report Information

No Biennial Report detail information available.

**Activity Location:** NC **Source Type:** Biennial Report **Seq. Number:** 7 **Receive Date:** 08 MAR 2002 **Report Cycle:** 2001

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS CO

**Location** 1401 BURRIS RD  
**Address:** NEWTON, NC 28658

**Mailing** 1401 BURRIS RD  
**Address:** NEWTON, NC 28658  
 UNITED STATES

**Contact Person** JOHN J. MAYO  
**For Source Information** (828) 465-0352 ext. 221 UNITED STATES

**Geometric Type Code:** Horizontal Collection Method: Reference Point Code:  
**Horizontal Accuracy Measure:** Horizontal Reference Datum: Source Map Scale Numbers: 0

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:

Accessibility: No. Employees: 0 State District:

NAICS Codes: 331491 Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding

# RCRA Site Detail

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:

Other Hazardous Waste Generator Activities

Importer Activity: No  
Mixed Waste Generator: No

Transporter Activity: Unknown

TSD Activity: No

Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace Exemption: Unknown

### Used Oil Activities

Used Oil Transporter Activity: Unknown  
Off-Specification Used Oil Burner: Unknown

Transporter: Unknown  
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Used Oil Processor and/or Re-refiner Activity

Processor: Unknown  
Refiner: Unknown

Marketer who first claims the used oil meets the specifications: Unknown

Underground Injection Control: Unknown

Destination Facility for Universal Waste: Unknown

### Universal Waste Activities:

Description	Generated	Accumulated/Managed
Batteries	U	U
Lamps	Y	Y
Pesticides	U	U
Mercury containing equipment	U	U

### Biennial Report Information

Total Quantity Reported (Tons): Generated: 25 Managed: 0 Shipped: 25 Received: 0

### Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
HAZARDOUS WASTE, SOLID, N.O.S., BARIUM	5	0	5	H111 - STABILIZATION OR CHEMICAL FIXATION
EPA Waste Codes: D005				
HAZARDOUS WASTE, SOLID, N.O.S., LEAD	0	0	0	H111 - STABILIZATION OR CHEMICAL FIXATION
EPA Waste Codes: D008				
HAZARDOUS WASTE, LIQUID, FLAMMABLE, INK BOTTLES	0	0	0	H061 - FUEL BLENDING
EPA Waste Codes: D001, D035				

Activity Location: NC Source Type: Notification Seq. Number: 2 Receive Date: 08 JAN 2001

Other/Previous Site Name: SPECIAL METALS WELDING PRODUCTS CO

Location Address: 1401 BURRIS ROAD NEWTON, NC 28658	Mailing Address: 1401 BURRIS ROAD NEWTON, NC 28658 UNITED STATES
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Contact Person: JOHN MAYO  
For Source Information: (828) 465-0352  
Address: 1401 BURRIS ROAD  
NEWTON, NC 28658  
UNITED STATES

Owner (current): SPECIAL METALS  
From: 01/01/0001 To: 3200 RIVERSIDE DR HUNTINGTON, WV 25705  
Type: Private  
Phone: (304) 526-5100  
Geometric Type Code: Horizontal Collection Method: Reference Point Code:  
Horizontal Accuracy Measure: Horizontal Reference Datum: Source Map Scale Numbers: 0

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:  
Accessibility: No. Employees: 0 State District:

Notes: NO NOTIFICATION COMMENTS MAINTAINED ON W



# RCRA Site Detail

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 Activity

Off-Specification Used Oil Burner:

No

Importer Activity: Unknown  
Mixed Waste Generator: Unknown

Transporter: No  
Transfer Facility: No

Used Oil Fuel Marketer Activity

Transporter Activity: No  
TSD Activity: No  
Recycler Activity: No

Used Oil Processor and/or Re-refiner Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:

No

### Exempt Boiler and/or Industrial Furnace

Processor: No  
Refiner: 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 Identification Form)

EPA Waste Codes: D002, D005, D035, F002

Activity Location: NC Source Type: Biennial Report Seq. Number: 6 Receive Date: 23 FEB 2000 Report Cycle: 1999

Other/Previous Site Name: INCO ALLOYS INTERNATIONAL INC

Location: 1401 BURRIS RD  
Address: NEWTON, NC 28658

Mailing Address: 1401 BURRIS RD  
Address: NEWTON, NC 28658

Contact Person: AHMAD SEYEDTALEBI  
For Source Information: (828) 526-5683

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:  
Accessibility: No. Employees: State District:

NAICS Codes: 333992 Welding and Soldering Equipment Manufacturing

### 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 Activity

Off-Specification Used Oil Burner:

Unknown

Importer Activity: Unknown  
Mixed Waste Generator: Unknown

Transporter: Unknown  
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown  
TSD Activity: No  
Recycler Activity: Unknown

Used Oil Processor and/or Re-refiner Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:

Unknown

### Exempt Boiler and/or Industrial Furnace

Processor: Unknown  
Refiner: Unknown

Marketer who first claims the used oil meets the specifications:

Unknown

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace Exemption: Unknown

Underground Injection Control: Unknown

Destination Facility for Universal Waste:

Unknown

### Biennial Report Information

Total Quantity Reported (Tons): Generated: 24 Managed: 0 Shipped: 24 Received: 0

### Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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BARIUM CONTAINING COMPOUND FROM WELDING FLUX MIXING OPERATIONS, SOLID.

4 0

4 H111 - STABILIZATION OR CHEMICAL FIXATION

EPA Waste Codes: D005

PARTS WASHER, A PETROLEUM NAPHTHA RECYCLED SOLVENT, PROVIDED AND SERVICED BY SAFETY KLEEN.

0 0

0 H020 - SOLVENTS RECOVERY

EPA Waste Codes: D039

# RCRA Site Detail

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

## NCD980841951 SPECIAL METALS WELDING PRODUCTS

Continued...

### Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
0	0			0 H061 - FUEL BLENDING

EPA Waste Codes: D001, D035

Activity Location: NC Source Type: Biennial Report Seq. Number: 5 Receive Date: 13 NOV 1998 Report Cycle: 1997

Other/Previous Site Name: INCO ALLOYS INTERNATIONAL INC

Location 1401 BURRIS RD  
Address: NEWTON, NC 28658

Mailing 1401 BURRIS RD  
Address: NEWTON, NC 28658

Contact Person AHMAD SEYEDTALEBI  
For Source (304) 526-5683  
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:

Accessibility: No. Employees: State District:

NAICS Codes: 333992 Welding and Soldering Equipment Manufacturing

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

### Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Importer Activity: Unknown  
Mixed Waste Generator: Unknown

Transporter: Unknown  
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown

Used Oil Processor and/or  
Re-refiner Activity

Marketer who directs shipment  
off-specification used oil to  
off-specification used oil burner: Unknown

TSD Activity: No

Processor: Unknown  
Refiner: Unknown

Marketer who first claims the used  
oil meets the specifications: Unknown

Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace  
Exemption: Unknown

Underground Injection Control: Unknown Destination Facility for  
Universal Waste: Unknown

### Biennial Report Information

Total Quantity Reported (Tons): Generated: 72 Managed: 0 Shipped: 72 Received: 0

### Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
20	0		20	H129 - OTHER TREATMENT

EPA Waste Codes: D005

WASTE FLAMMABLE LIQUID INK FROM SURFACE PRINTING OPERATION CONTAINING METHYL ETHYL KETONE AND ETHANOL (D001, D035)

1 0

1 H141 - STORAGE, BULKING AND/OR  
TRANSFER OFF SITE

EPA Waste Codes: D001, D035

Activity Location: NC Source Type: Notification Seq. Number: 1 Receive Date: 10 DEC 1996

Other/Previous Site Name: INCO ALLOYS WELDING PRODUCTS

Location 1401 BURRIS ROAD  
Address: NEWTON, NC 28658

Mailing 1401 BURRIS ROAD  
Address: NEWTON, NC 28658

Land Type: Private Non Notifier: No Commercial Availability: Other - U Tsd Date:

Accessibility: No. Employees: State District:

# RCRA Site Detail

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	<b>Used Oil Activities</b>		
<b>Other Hazardous Waste Generator Activities</b>		Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity:	Unknown	Transporter:	No	Used Oil Fuel Marketer Activity
Mixed Waste Generator:	Unknown	Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity		No
TSD Activity:	No	Processor:	No	Marketer who first claims the used oil meets the specifications:
Recycler Activity:	No	Refiner:	No	No
<b>Exempt Boiler and/or Industrial Furnace</b>		Underground Injection Control:	No	Destination Facility for Universal Waste:
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	Unknown			

**Activity Location: NC Source Type: Biennial Report 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** 1401 BURRIS ROAD  
**Address:** NEWTON, NC 28658

**Contact Person** M L ANSELL  
For Source Information (304) 526-5683

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:  
Accessibility: No. Employees: State District:

NAICS Codes: 333992 Welding and Soldering Equipment Manufacturing

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility:	Unknown	<b>Used Oil Activities</b>		
<b>Other Hazardous Waste Generator Activities</b>		Used Oil Transporter Activity	Off-Specification Used Oil Burner:	Unknown
Importer Activity:	Unknown	Transporter:	Unknown	Used Oil Fuel Marketer Activity
Mixed Waste Generator:	Unknown	Transfer Facility:	Unknown	Marketer who directs shipment off-specification used oil to off-specification used oil burner:
Transporter Activity:	Unknown	Used Oil Processor and/or Re-refiner Activity		Unknown
TSD Activity:	No	Processor:	Unknown	Marketer who first claims the used oil meets the specifications:
Recycler Activity:	Unknown	Refiner:	Unknown	Unknown
<b>Exempt Boiler and/or Industrial Furnace</b>		Underground Injection Control:	Unknown	Destination Facility for Universal Waste:
Small Quantity Onsite Burner Exemption: Smelting, melting, Refining Furnace Exemption:	Unknown			Unknown

### Biennial Report Information

**Total Quantity Reported (Tons):** Generated: 52 Managed: 0 Shipped: 52 Received: 0

#### Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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BARIUM CONTAINING COMPOUND FROM WELDING FLUX OPERATIONS(SOLID D005).	1	0	1	H129 - OTHER TREATMENT
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EPA Waste Codes: D005

WASTE COMBUSTIBLE LIQUID FROM PARTS WASHERS (CONTAINSPETROLEUM NAPTIA).	0	0	0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
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EPA Waste Codes: D001, D039

# RCRA Site Detail

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

**NCD980841951 SPECIAL METALS WELDING PRODUCTS**

Continued...

Activity Location: NC Source Type: Biennial Report Seq. Number: 3 Receive Date: 23 FEB 1994 Report Cycle: 1993

Other/Previous Site Name: INCO ALLOYS INTERNATIONAL, INC.

Location Address: 1401 BURRIS ROAD NEWTON, NC 28658	Mailing Address: 1401 BURRIS ROAD NEWTON, NC 28658
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Contact Person M L ANSELL  
For Source (304) 526-5683  
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:  
Accessibility: No. Employees: State District:

NAICS Codes: 333992 Welding and Soldering Equipment Manufacturing

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown	<b>Used Oil Activities</b>		
Other Hazardous Waste Generator Activities	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	Unknown
Importer Activity: Unknown	Transporter: Unknown	Used Oil Fuel Marketer Activity	
Mixed Waste Generator: Unknown	Transfer Facility: Unknown	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	Unknown
Transporter Activity: Unknown	Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	Unknown
TSD Activity: No	Processor: Unknown		
Recycler Activity: Unknown	Refiner: Unknown	Destination Facility for Universal Waste:	Unknown
Exempt Boiler and/or Industrial Furnace	Underground Injection Control: Unknown		
Small Quantity Onsite Burner Exemption: Unknown			
Smelting, melting, Refining Furnace Exemption: Unknown			

**Biennial Report Information**

Total Quantity Reported (Tons): Generated: 47 Managed: 0 Shipped: 47 Received: 0

**Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)**

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
11	0	HAZARDOUS WASTE LIQUID, FROM A FLOOR GRATE & CLEAN UP, (CONTAINS SELENIUM & LEAD D008 & D010)	11	H129 - OTHER TREATMENT
EPA Waste Codes: D008, D010				
3	0	BARIUM CONTAINING COMPOUND FROM WELDING FLUX MIXING OPERATIONS (SOLID- D005)	3	H132 - LANDFILL OR SURFACE IMPOUNDMENT
EPA Waste Codes: D005				
0	0	WASTE COMBUSTIBLE LIQUID FROM PARTS CLEANERS. (PETROLEUM NAPHTHA)	0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001, D039				

Activity Location: NC Source Type: Biennial Report Seq. Number: 2 Receive Date: 27 FEB 1992 Report Cycle: 1991

Other/Previous Site Name: INCO ALLOYS INTERNATIONAL INC

Location Address: 1401 BURRIS ROAD NEWTON, NC 28658	Mailing Address: 1401 BURRIS ROAD NEWTON, NC 28658
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Contact Person JAMES P HUNT  
For Source (704) 465-0352  
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:  
Accessibility: No. Employees: State District:

NAICS Codes: 333992 Welding and Soldering Equipment Manufacturing

# RCRA Site Detail

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: Unknown

### Used Oil Activities

### Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Importer Activity: Unknown  
Mixed Waste Generator: Unknown

Transporter: Unknown  
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown  
TSD Activity: No  
Recycler Activity: Unknown

Used Oil Processor and/or Re-refiner Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Processor: Unknown  
Refiner: Unknown

Marketer who first claims the used oil meets the specifications: Unknown

### Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace Exemption: Unknown

Underground Injection Control: Unknown Destination Facility for Universal Waste: Unknown

### Biennial Report Information

Total Quantity Reported (Tons): Generated: 39 Managed: 0 Shipped: 39 Received: 0

### Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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COMBUSTIBLE LIQUID FROM DEGREASING OPERATION IN MAINTENANCE.

0 0

0 H020 - SOLVENTS RECOVERY

EPA Waste Codes: D001, D039

Activity Location: NC Source Type: Biennial Report Seq. Number: 1 Receive Date: 28 FEB 1990 Report Cycle: 1989

Other/Previous Site Name: INCO Alloys International, Inc.

Location 1401 Burris Road  
Address: Newton, NC 28658

Mailing 1401 Burris Road  
Address: Newton, NC 28658

Contact Person HAROLD S Winnell  
For Source (704) 465-0394  
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:  
Accessibility: No. Employees: State District:

Notes: INTEGRAL PART OF FINISHED PRODUCT

### Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

### Used Oil Activities

### Other Hazardous Waste Generator Activities

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Importer Activity: Unknown  
Mixed Waste Generator: Unknown

Transporter: Unknown  
Transfer Facility: Unknown

Used Oil Fuel Marketer Activity

Transporter Activity: Unknown  
TSD Activity: No  
Recycler Activity: Unknown

Used Oil Processor and/or Re-refiner Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Processor: Unknown  
Refiner: Unknown

Marketer who first claims the used oil meets the specifications: Unknown

### Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace Exemption: Unknown

Underground Injection Control: Unknown Destination Facility for Universal Waste: Unknown

### Biennial Report Information

Total Quantity Reported (Tons): Generated: 44 Managed: 0 Shipped: 44 Received: 0

### Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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**NCD980841951 SPECIAL METALS WELDING PRODUCTS**

Continued...

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\* 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