

Columbus Co. 24-02
1987

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SCAN Doc.

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NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES

TO C. Hines DATE _____

FROM Opel Columbus

- For your information Keep Return
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- Note and see me about this, Please
- Prepare a reply
 - Your signature My signature
 - Send me a copy of reply
- Your comments
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NO ACTION per
telephone conversation
w/ Marshall White



Cal

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

April 22, 1987

Mr. Marshall White
Environmental Resources Supervisor
Federal Paper Board Company, Inc.
Riegelwood Operations
Riegelwood, N.C. 28456

Subject: Variance from Section .0505 (10)(e)-Perforation of Barrels and Drums.

Dear Mr. White:

Reference is made to your letter dated March 24, 1987 requesting a variance from the perforation requirement of Section .0505 (10)(e) of the North Carolina Solid Waste Management Rules at the Federal Paper Board Company Landfill, Permit # 24-02. This rule, which is an operational requirement for sanitary landfills states that "barrels and drums shall not be disposed of unless they are empty and perforated sufficiently to ensure that no liquid or hazardous waste is contained therein".

In your letter you explained Federal Paper Board Company's policy, which includes training and inspections to insure that all barrels and drums are empty prior to disposal, and stated your concern for safety of employees if barrels and drums are perforated by hand.

Section .0205 of the Rules, allow variances to be given to avoid undue hardships and promote effective and reasonable application and enforcement of the Rules. This Section also requires that variances be made part of the conditions of the permit.

In that this office has no regulatory history which indicates that Federal Paper Board Company has ever disposed of drums or barrels containing liquids or hazardous waste within their permitted landfill, and that the landfill is located on Federal Paper Board Company property, and that this site is not open to the public, the request is granted.

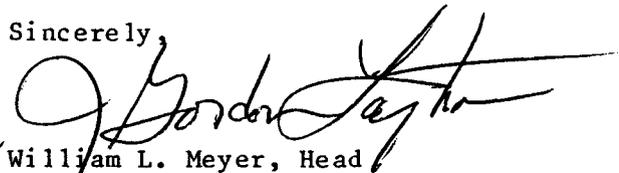
The following conditions are amended to permit #24-02:

1. Barrels or drums, properly rinsed or drained and with bungs removed are allowed for disposal within the landfill,
2. No perforations are required.

Please be informed that should future inspections reveal the presence of barrels or drums within the landfill containing liquid or hazardous waste, this variance shall be immediately revoked, and Federal Paper Board Company will be subject to enforcement action.

If you have any questions feel free to contact Mr. Worth Heath at (919) 486-1191 or Mr. Terry Dover at (919) 733-2178.

Sincerely,

for 

William L. Meyer, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

WLM/TFD/mj

cc: Terry Dover
Worth Heath
Permitting File



FEDERAL PAPER BOARD COMPANY, INC.

RIEGELWOOD OPERATIONS
RIEGELWOOD, NORTH CAROLINA 28456
TELEPHONE 919 655-2211

March 24, 1987



Mr. Terry Dover
Division of Health Services
Solid & Hazardous Wastes Branch
P. O. Box 2091
Raleigh, North Carolina 27602

Dear Mr. Dover:

This will confirm our telephone conversation of March 23, concerning the regulation requirement to perforate drums prior to their being landfilled.

As I related to you, this same situation arose in 1982, at which time I visited the staff in Raleigh for a discussion of the requirement as it applied to private landfills such as Federal's. I explained Federal's drum control program and requested that Federal be allowed to landfill drums with the bungs removed but unperforated. At the conclusion of our discussion, Messrs. Layton and Page agreed that we could dispose of drums as requested.

We have a drum management program that I feel provides us reasonable protection from the presence of drums of hazardous materials reaching the landfill. Our procedures for handling hazardous materials drums, which are identified by their ICC labels, include the rinsing of the drums at the point of use and inverting them with the bungs out, for drainage, prior to disposing of them in dumpsters or by truck to the landfill. Chemical handlers are trained in classroom lectures, by me, in the proper disposal of drums. Also, frequent inspections are performed, by me or my designated engineer, in areas where drums of hazardous materials are used and on the landfill. Any violation of the drum handling procedure discovered in these inspections is corrected by the person responsible for the violation. The landfill operators are instructed not to cover drums whose bungs have not been removed. From time to time, memoranda are issued on the handling of drums, as on other subjects in the environmental/solid waste area, to maintain a high level of environmental awareness in the employee group.

Mr. Terry Dover

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March 24, 1987

In practice, these efforts have been very effective in curtailing the improper disposal of drums. I have not been aware of any incidents of hazardous chemical drum disposal on the landfill; and there have been no incidents of drum fires, explosions, or material splashing.

In view of the present procedure developed in 1982 in conference with your staff and the satisfactory drum disposal experience since 1982, I request that a variance be granted per section 10.e.-.0505 of the rules to allow Federal to continue to landfill drums per our current procedure.

Your prompt consideration and approval of this request will be appreciated.

Very truly yours,

FEDERAL PAPER BOARD COMPANY, INC.
Riegelwood Operations



M. T. White
Environmental Resources Supervisor

MTW/mha