

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

**Your Name:** Sean Morris

**Facility ID Number:** NCD098765001

**Facility Name:** Klingspor Abrasives, Inc.

**Document Group:** Inspection/Investigation (I)    **Document Type:** I - Compliance Assistance Visit (CAV)

**Description for File (for CARA):** SQG Compliance Assistance Visit

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**Author(s) of Document:** Sean Morris

**Inspector ID #:** NC046

**Suborganization:** Western Region

**Comments for RCRAInfo:** SQG Compliance Assistance Visit

**County (if not on report):** Catawba



**NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH**

**RCRA INSPECTION REPORT**

1. **Facility Information:** Klingspor Abrasives, Inc.  
2555 Tate Blvd SE, Hickory, NC 28603  
**NCD 098 165 001 SQG**
  
- Mailing Address:** P.O. Box 2367  
Hickory, NC 28603
  
2. **Facility Contact:** Ms. Amanda Reese, Klingspor-EH&S Officer  
Phone: 828-326-0269 Email: [AREese@klingspor.com](mailto:AREese@klingspor.com)
  
3. **Inspectors:** Mr. Sean Morris, HWS-Environmental Senior Specialist  
Mr. Jeff Menzel, HWS-Environmental Senior Specialist
  
4. **Survey Participants:** Ms. Amanda Reese, Klingspor-EH&S Officer  
Mr. Auldin Robinson, Klingspor-Maintenance Dept.
  
5. **Date/Time of Inspection:** January 14, 2016/ Arrived: 10:35am - Departed: 2:00pm
  
- Date of Report:** March 8, 2016 – Report Prepared By: Sean Morris
  
6. **Purpose of Inspection:** To Determine Compliance with NC Hazardous Waste Rules & Regulations
  
7. **Facility Description:**

On January 14, 2016 Mr. Jeff Menzel and I conducted a compliance assistance visit at Klingspor Abrasives, Inc. (Klingspor), located in Hickory, NC. Klingspor manufactures sanding and grinding products, such as coated abrasives, abrasive belts, abrasive sheets & bonded abrasives. The facility has been at the current location since it was constructed in 1985 and is 120,000 square feet in size. The facility currently has approximately 120-employees and operates on one primary shift, 5-days a week. The facility is connected to The City of Hickory water and sewer services and does not operate a wastewater pretreatment system.

Facility operations include the final processing & packaging of various abrasive products as well as application of different types of backing onto abrasive media using hot melt adhesives. The facility receives finished rolled abrasive products from Klingspor's manufacturing plant located in Germany, which is then cut into various sized disc and sheet sizes prior to being packaged for final retail sale to commercial customers. The facility's hot melt adhesive process uses hot melt glue, both PUR (reactive polyurethane) and PSA (pressure sensitive adhesive), to attach backing to the grinding and sanding products. Belt glue is made up in-house using solvents and urethane adhesive and hazardous waste is primarily generated from this process. The facility is currently notified as a small quantity generator (SQG) of hazardous waste and, based on a review of manifests, was operating as a SQG at the time of the visit. The facility may fluctuate between SQG and conditionally exempt small quantity generator (CESQG) on occasion. Ms. Reese was going to begin tracking the exact amount of hazardous waste generated per calendar month.

**8. Waste Type:**

- D001/F003,F005 waste flammable solid (acetone, ethyl acetate)

**9. Areas of Inspection:**Manifests:

Hazardous waste manifests were reviewed at the time of the inspection. The manifests reviewed were in good order and documented approved transporters and TSD facilities. Land Disposal Restriction forms accompanied the manifests.

Transporters: Freehold Cartage - NJD054126164  
North Star Logistics - NCO991302661

TSDFs: Giant Resource Recovery - SCD 036 275 626

Waste Minimization:

The facility changed replaced fluorescent lamps with LED lamp fixtures at the end of 2015.

Weekly Inspections:

Facility personnel conduct and document weekly inspections of the facility's hazardous waste container storage area. The inspection records are maintained electronically and were up to date at the time of the inspection.

Emergency Preparedness & Contingency Plan:

The facility is equipped with fire extinguishers, fire alarms and sprinkler system. The facility is required to designate an emergency coordinator and to post a SQG contingency plan next to phones within the facility. The facility must also attempt to secure emergency arrangement agreements with local authorities (See Deficiency Section)

Training:

The facility has not developed or implemented a hazardous waste training program for employees that either handle or manage hazardous waste onsite (See Deficiency Section).

Satellite Accumulation Areas (SAAs):

The following SAAs were visited at the time of the inspection:

1. Belt Glue Mix Area - There was one 5-gallon container of hazardous waste glue in this area. The container was properly labeled and closed at the time of the inspection.
2. Glue Head Parts Washer Area - There was one 5-gallon container of hazardous waste acetone in this area. The container was properly labeled and closed at the time of the inspection.
3. Wide Belt Area - There was one 5-gallon container of hazardous waste solvent in this area. The container was properly closed but was not properly labeled at the time of the inspection (See Deficiency Section).

#### Hazardous Waste Storage Area:

The facility maintains the following hazardous waste storage area:

1. Hazardous Waste Central Storage Area – The storage area is located outside on the east side of the manufacturing building. There were three 55-gallon containers of hazardous waste in storage at the time of the inspection. All of the containers were properly closed, labeled and marked with an accumulation start date. The dates on the containers were as follows: 7/07/15, 8/07/2015, and 10/20/2015. Several recommendations were made regarding this storage area (See Comment Section).

#### Used Oil and Universal Waste:

The facility generates universal waste lamps and batteries. The facility replaced all fluorescent lamp fixtures with LED fixtures at the end of 2015. Universal waste is currently being sent to IBS Environmental (See Comment Section).

The facility generates used oil from general machinery maintenance. Several of the facility's processing machines are equipped with oil filtering systems to reduce the amount of oil usage. Used oil is accumulated in 55-gallon containers and the facility generates less than 55 gallons annually. There was one 55-gallon container of used oil being stored within a metal storage building, located just outside of the eastern side of the facility. The container was not properly labeled at the time of the inspection (See Deficiency Section). It was also strongly recommended that used oil collection receipts be maintained onsite (See Comment Section).

#### **10. Comments:**

- It is strongly recommended that the facility's hazardous waste storage area be redesigned so that containers within storage are protected from rain and are stored in an area that provides some type of secondary containment in order to minimize the potential for a release of hazardous waste into the environment. The area should also be clearly designated for the storage of hazardous waste and sufficient aisle space must be maintained to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment within the area.
- It is recommended that the metal storage building, located next to the facility's hazardous waste storage area, not be used for the accumulation of hazardous waste. If the area is used for accumulation, the area would be considered a hazardous waste storage area and must meet all storage area requirements including the documentation of weekly container inspections of the area.
- It is strongly recommended that universal waste and used oil collection receipts be maintained along with waste disposal manifests. It is also a reminder that 40 CFR Part 273 regulations requires a generator to provide universal waste training to employees that handle or manage the waste. Universal waste containers must also be managed in properly labeled and closed containers and must not be stored onsite for more than one year from the time it was generated.
- It is a reminder that the facility must maintain documentation that demonstrates that a proper hazardous waste determination has been conducted on dust collected from the ten dust collection systems currently in use. The waste dust was being managed as solid waste at the time of the inspection. A representative sample of the waste dust should be collected and analyzed for RCRA constituents per TCLP laboratory analysis.

**11. Site Deficiencies:**

- A. Klingspor Abrasives, Inc. must properly label all SAA containers. 40 CFR 262.34 (c)(1)(ii) states that a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.31 or §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) or (d) of this section provided he: (ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers. *NOTE: All SAA containers are also required to be closed except for when adding or removing waste.*
- B. Klingspor Abrasives, Inc. must designate a primary emergency coordinator. 40 CFR 262.34 (d)(5)(i) states that all times there must be at least one employee either on the premises or on call (*i.e.*, available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures.
- C. Klingspor Abrasives, Inc. must develop and post a SQG contingency plan. 40 CFR 262.34 (d)(5)(ii) states that the facility must also post the name and telephone number of the emergency coordinator; location of fire extinguishers and spill control material, and, if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm, at telephones throughout the facility. *NOTE: Specifically, this information should be posted at the hazardous waste storage area, front receptionist area and where phones are present within production areas.*
- D. Klingspor Abrasives, Inc. must attempt to secure emergency arrangements with local authorities. 40 CFR 265.37 states that 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. *NOTE: The arrangements should be attempted through submittal of emergency arrangement agreement letters to the local fire department, police department, local hospital and County emergency management office.*
- E. Klingspor Abrasives, Inc. must implement a hazardous waste training program. 40 CFR 262.34 (d)(5)(iii) states that the generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.
- F. Klingspor Abrasives, Inc. must maintain an emergency communication device within the hazardous waste storage area. 40 CFR 265.34 (a) states that whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under §265.32.
- G. Klingspor Abrasives, Inc. must determine how solvent wipes used for cleaning will be managed (*i.e.* hazardous waste, non-hazardous waste, excluded solvent wipes). 40 CFR Part 261.4 (b)(18) lists the requirements for management of excluded used solvent-contaminated wipes.

H. Klingspor Abrasives, Inc. must properly label all used oil containers. 40 CFR 279.22 (c)(1) states that containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

- \* **NOTE: The deficiencies summarized above were noted during a Compliance Assistance Visit (CAV). After 30 days, from the date report is received, your facility is subject to an unannounced Compliance Evaluation Inspection (CEI). Any violations found during a subsequent CEI will be subject to enforcement.**

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**J. SEAN MORRIS / DATE  
NC HWS-COMPLIANCE BRANCH**

**SENT BY E-MAIL  
FACILITY CONTACT**

cc:  
Central Office Files  
Brent Burch Compliance Branch Head  
Amanda Reese, Klingspor-EH&S Officer