



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: Durham PERMIT NO.: 32-09I FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incin	X	T&P		FIRM		
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDF		

Date of Audit: 1/20/10

Date of Last Audit: 8/26/09

FACILITY NAME AND ADDRESS:

GlaxcoSmithKline, Inc.
 3025 Cornwallis Road
 RTP, Durham County, NC

GPS COORDINATES: **N:** 35.92026

E: -78.86762

FACILITY CONTACT NAME AND PHONE NUMBER:

Neal Parker 919-483-1696

FACILITY CONTACT ADDRESS:

5 Moore Drive, Nth-P1156
 GlaxcoSmithKline, RTP, NC 27709

AUDIT PARTICIPANTS:

Neal Parker, Manager Environmental, Health, Safety Operations
 Chris Marriott, NC DENR

STATUS OF PERMIT:

Original Issue (PTO): February 8, 1996
 Modification/Renewal (change in ownership/change in service area): May14, 2002
 Amendment (Permit Renewal): March 22, 2007
 Modification(change in ash/lime sampling procedure): August 19, 2009
 Permit Review Date: March 22, 2012

PURPOSE OF AUDIT:

Partial Audit

NOTICE OF VIOLATION(S):

PERMIT CONDITION 11: This facility shall conform to the operation requirements described in the approved plan, 15A NCAC 13B .0529, .1207(1) and (3), and the conditions specified herein.

The approved operations plan for the facility states: "The incinerator uses domestic water injected into the primary (lower) combustion chamber to cool the burning waste when the temperature exceeds 1500 F. In 2009 a project was completed that provides a tank and pump system to allow reclaimed water to be substituted for the domestic cooling water. The reclaimed water is unregulated aqueous wastewater containing dilute concentrations of pharmaceutical compounds from R&D operations. Now, either domestic water or wastewater can be used for cooling with this system."

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On January 13, 2010, Neil Parker with GlaxoSmithKline (GSK) notifies Chris Marriott of SWS of a D001 RCRA hazardous waste charged into the incinerator via the reclaimed water tank. Further investigations by GSK revealed that other RCRA hazardous wastes [methylene chloride (F002), acetone (F003), and toluene (F005)] were possibly charged into the tank via the reclaimed water tank.

GSK has already taken initial steps to correct the above violation. The steps include a complete decontamination of the incinerator on January 20-22, 2010 and disconnection of the reclaimed water tank. GSK has completed an investigation of the incident and submitted a summary report to both the Hazardous and Solid Waste Sections.

Corrective Action:

GSK should submit a request for a permit modification with a revision to the Facility Operations Plan to the SWS. The revised Operations Plan should include a detailed description of the reclaimed water tank (a.k.a. overfire water tank) system and its process, a screening plan to ensure that no regulated wastes are drained into the reclaimed water tank in the future, and a revised ash/lime sampling plan to ensure that all waste leaving the facility for disposal is properly handled. The reclaimed water tank should remain out of service until such time that this revised plan is approved.

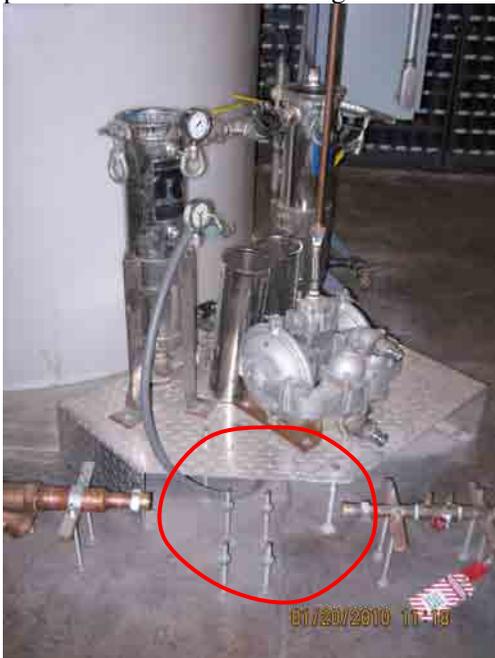
You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

STATUS OF PAST NOTED VIOLATIONS:

None

AREAS OF CONCERN AND COMMENTS:

- 1) Inspection was a result of the notification by Neil Parker on January 13, 2010, notifying of hazardous waste being utilized in the operation of incinerator.
- 2) At the time of this inspection the reclaimed water tank had been taken out of service. The pump that would provide service to the cooling nozzles of the incinerator had been removed (pictured below).



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- 3) The reclaimed water tank had been triple rinsed (in background of above picture-white). All rinse water was collected in barrels and was stored in one of the hazardous waste holding areas on the property.
- 4) A complete cleaning of the incinerator and incinerator building was underway during the downtime for this investigation.

Please contact me if you have any questions or concerns regarding this audit report.



Phone: 336-771-5090

Chris Marriott
Environmental Senior Specialist
Regional Representative

Delivered on : <u>February 12, 2010</u> by	<input type="checkbox"/>	Hand delivery	<input type="checkbox"/>	E-Mail	<input checked="" type="checkbox"/>	Certified No. <u>[7008 0500 0002 0609 4816]</u>
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cc: Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central District Supervisor
Donald Herndon, Compliance Officer