

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

**Your Name:** J. Sean Morris

**Facility ID Number:** NCD986210839

**Facility Name:** Wireway Husky Corporation

**Document Group:** Inspection/Investigation (I) **Document Type:** I - Compliance Evaluation Inspection (CEI)

**Description for File (for CARA):** LQG Compliance Inspection

**Date of Document:** 11/3/2015

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

**Inspector ID #:** NC046

**Suborganization:** Western Region

**Comments for RCRAInfo:**LQG Compliance Inspection

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

**For Violations:**

**Enforcement Date:** [Click here to enter a date.](#)

**Docket Number:**

**Enforcement Type:**

**How many violations were there?**

**For IANOV or CO:** The facility is

**Outcome Measures for CSE for IANOV or CO:**

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

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

**RCRA INSPECTION REPORT**

1. **Facility Information:** Wireway Husky Corporation (Husky Rack & Wire)  
6146 Denver Industrial Park Circle  
Denver, NC 28037  
**NCD 986 210 839, LQG**  
  
P.O. Box 645  
Denver, NC 28037
2. **Facility Contact:** Mr. Eric Stegall, Wireway Husky-Engineer Manager  
704.483.1900 ext. 554
3. **Inspector:** Mr. Sean Morris, HWS-Environmental Senior Specialist
4. **Survey Participants:** Mr. Eric Stegall, Wireway Husky-Engineer Manager
5. **Date/Time of Inspection:** November 3, 2015 / Arrived: 11:35am - Departed: 1:40pm  
  
**Date of Report:** February 5, 2016 – Prepared By: Sean Morris
6. **Purpose of Inspection:** To determine compliance with NC Hazardous Waste Rules & Regulations
7. **Facility Description:**

On November 3, 2015 I conducted a comprehensive evaluation inspection at Wireway Husky Corporation located in Denver, NC. Wireway Husky Corporation manufactures security steel wire products, such as wire partitions, pallet racks, welded wire storage decks & wire guards. The facility also manufactures products such as steel frames for pallet racks. The facility has been at the current location since the facility was constructed in 1987 and is located on a 20-acre tract with one main production building that is approximately 250,000 square feet in size. The facility currently has approximately 200-employees and operates on two primary shifts, 5-days a week. The facility is connected to Lincoln County water and sewer services and does not operate a wastewater pretreatment system. There was one water supply well identified onsite but the well us not in use.

Facility manufacturing operations include coiled flat roll steel form/roll pressing, seam welding (manual and robotic), steel press cutting, robotic wire weaving, steel part cleaning, part painting, product assembly and packaging. Wireway Husky Corporation generates hazardous waste from cleaning operations associated with the facility's one auto paint spray booth and one manual paint spray booth. The facility also generates hazardous waste distillation still bottoms from two small distillation units used to recycle spent solvents. The facility also generates hazardous waste aerosol cans, hazardous waste solvent wipes, used oil and universal waste.

Based on the facility's hazardous waste manifests, the facility currently generates between 2400-3000 pounds of hazardous waste every two months; not counting the amount of spent solvent recycled once per month. The facility recycles approximately 300-gallons of spent solvent monthly but Mr. Stegall was not exactly sure how much would be counted once. Based on the monthly hazardous waste generation amounts and amount of spent solvent likely to be counted each month from recycling activities Mr. Stegall explained that the facility is operating as a large quantity generator (LQG).

**8. Waste Type:**

- D001/F003, waste flammable liquid (butyl acetate)
- D001, waste aerosol cans

**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 – NJD 054 126 164  
Care Environmental – NJD 986 637 296  
Environmental Options – VAO 000 122 994  
Giant Resource Recovery Railhead – SCD 987 594 991

TSDFs: Giant Resource Recovery – SCD 036 275 626

Waste Minimization:

The facility has completed LQG waste minimization checklists in the past and Mr. Stegall has begun development of a written plan (See Comment Section).

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 Ms. Pam Edwards, Wireway Husky-Engineering Assistant, is the primary inspector. The inspection logs were up to date at the time of the inspection.

Emergency Preparedness:

The facility is equipped with a P/A system, fire alarm pull stations and security system. The facility is also equipped with fire extinguishers, spill control materials and a sprinkler system that is supplied by municipal water. Emergency arrangement agreement request letters were last submitted to local emergency response agencies and contractors in September 2013 and certified mail receipts were available. The facility's primary emergency coordinator is currently listed as Mr. Eric Stegall.

Training:

The facility has a hazardous waste training program in place. Mr. Eric Stegall presents annual and initial RCRA training to employees through PowerPoint presentation. The training program includes hazardous waste handling & management topics, contingency plan topics and universal waste topics. Mr. Stegall also includes a post training quiz to personnel to complete. Mr. Stegall and Mr. Jamie Cress attended off-site RCRA training through EPA Alliance Training Group during April 7-10, 2015. The last documented onsite training session was on July 28, 2015 and attendance sheets were available for 13-employees that completed the review. RCRA job titles and job descriptions were available for review (See Comment Section).

Biennial Report:

The facility's biennial report was submitted on January 14, 2014 to report all hazardous waste generated during the calendar year 2013. The report was available for review at the time of the inspection and the report listed that the facility generated 20,085-pounds of D001/F003 hazardous waste paint material and 1,392-pounds of D001 aerosol cans in 2013.

#### Contingency Plan:

The facility maintains a RCRA contingency plan on-site. The plan was last revised on July 2015 with only minor changes made. The plan lists Mr. Eric Stegall as the primary RCRA emergency coordinator and Mr. Jamie Cress as an alternate coordinator and includes phone numbers and home addresses. The plan includes a facility diagram that lists the type, location and capabilities of emergency equipment. The plan describes basic emergency response procedures, evacuation assembly procedures and lists emergency environmental contractors. The plan has been submitted to local emergency response agencies by certified mail (See Comment Section).

#### Accumulation Areas:

The following satellite accumulation areas were visited at the time of the inspection:

1. SAA #1 – There was one 55-gallon container of D001/F003 hazardous waste distillation still bottoms in this area, which is located next to the paint booths and distillation units. The container was properly labeled and closed at the time of the inspection. Used solvent wipes are also placed into this container when generated.
2. SAA #7 – There were five 5-gallon containers of D001/F003 hazardous waste solvent, which were located in a flammable material cabinet positioned next to the distillation units. The containers of spent solvent are awaiting distillation and were all properly labeled and closed at the time of the inspection.
3. SAA #2 – There was one 55-gallon container used to accumulate D001 waste aerosol cans in this area, which is located near the paint booths. The container was properly labeled and closed at the time of the inspection.

#### Hazardous Waste Storage Area:

The facility maintains the following hazardous waste storage area:

1. Hazardous Waste Central Storage Area – The storage area is located in a separate building just outside of the manufacturing building. There were two 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. There is a fire extinguisher and spill kit in the area and two-way radios or "Buddy System" are used for emergency communications. The area is marked as a hazardous waste storage area and a no smoking sign is posted. The area remains locked and four employees have access to the area.

#### Used Oil and Universal Waste:

The facility generates universal waste lamps. Universal waste lamps are managed using Veolia's mail in service. Used lamps are stored in the Maintenance Area and there was one box of used lamps in storage at the time of the inspection. The container of used lamps was properly closed and labeled at the time of the inspection (See Comment Section).

The facility generates used oil from general machinery maintenance. Used oil is accumulated in 55-gallon containers and 470-pounds was collected for recycling by Giant Resource Recovery on April 2, 2015.

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

- The facility's RCRA training records should be revised so that the job title of employees can be easily referenced to their corresponding job description. The job descriptions for Mr. Eric Stegall and Mr. Jamie Cress should clearly state their positions as RCRA emergency coordinators. Additionally, the full date of each initial & annual RCRA training session should be listed on employee training attendance logs.
- It is a reminder that the company's waste minimization plan must be available for review and it is recommended that the plan be reviewed/revised annually as necessary.

- It is recommended that a revision section be added to the facility's hazardous waste (RCRA) contingency plan which lists the date and reason for each revision made to the plan. It is a reminder that the facility's contingency plan must also clearly reference the emergency arrangement agreement letters submitted to local authorities per 40 CFR 265.52(c).
- It is a reminder that used lamps must be containerized, closed and labeled.

**11. Site Deficiencies:**

No deficiencies cited.

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

**SENT BY E-MAIL  
FACILITY CONTACT**

cc:  
Central Office Files  
Mr. Eric Stegall, Wireway Husky Corp.