

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

**Your Name:** Jeff Menzel

**Facility ID Number:** NCR000138800

**Facility Name:** Pharmagra Labs

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

**Description for File (for CARA):** No violations of applicable regulations were observed during this inspection

**Date of Document:** 1/20/2016

**Author(s) of Document:** Jeff Menzel

**Inspector ID #:** NC014

**Suborganization:** Western Region

**Comments for RCRAInfo:**No violations

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



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

**RCRA INSPECTION REPORT**

1. **Facility Information:** Pharmagra Labs  
158 McLean Road,  
Brevard, NC 28712  
NCR000138800  
  
**Mailing Address:** 158 McLean Road  
Brevard, NC 28712
2. **Facility Contact:** Roger Frisbee,  
Phone: 828-884-8656
3. **Inspector(s):** Mr. Jeff Menzel, HWS-Environmental Senior Specialist
4. **Survey Participants:** Dietrich Fabricius
5. **Date/Time of Inspection:** January 20, 2016 / Arrived: 10:00am Departed: 1:00pm  
**Date of Report:** February 29, 2016– Prepared By: Jeff Menzel
6. **Purpose of Inspection:** To determine compliance with NC Hazardous Waste Rules & Regulations
7. **Facility Description:**

Pharmagra Labs began operations in 1999. They are a contract research laboratory for pharmaceuticals and custom organic synthesis. They operate in an 11,400 square foot manufacturing facility on 3.5 acres and support 13 employees. They operate one shift and are served with the Town of Brevard water & sewer under NACIS # 54171.

8. **Hazardous Waste Type(s):**

F005/F004/F003/F002/D001/D018/D019/D028 - waste toxic liquid (acetone, toluene, xylene, methanol, methylene chloride, 1,2-dichloroethane, ethyl acetate, carbon tetrachloride, nitrobenzene, n-butyl alcohol, cyclohexanone, pyridine, chloroform)

D002 - waste corrosive liquid (hydrochloric acid, sulfuric acid, palladium)

D001/D023/F003/F005 – waste flammable liquid (methanol heptane)

## 9. Areas of Inspection:

### Manifests:

Hazardous waste manifests were reviewed from November 2013 to present. The manifests reviewed were in good order and documented approved transporters and TSD facilities. Land Disposal Restriction forms accompanied the manifests.

Transporters:	Univar USA, Inc.	GAD 980 845 077
	Dupree Transport	LAR 000 045 963
	Midwest Environmental	OHO 000 000 539

TSDs:	Tradebe Treatment & Recycling of TN	TND 000 772 186
	Giant Resource Recovery	SCD 036 275 626

### Waste Minimization:

The facility maintains a written waste minimization plan onsite. Hazardous waste streams are based on product production. The facility performs micro-scale chemical reactions during the testing and set-up phase of its production to prevent excessive waste during the production phase of its manufacturing processes.

### Weekly Inspections:

Inspections are conducted and recorded each Wednesday and a log kept as required. Inspections also include inspection of safety equipment and fire extinguishers. Records were reviewed from 2012 to present.

### Emergency Preparedness:

The facility is equipped with a P/A system, fire alarm pull stations and security system monitored by an outside contractor. The facility is also equipped with fire extinguishers, spill control materials and a sprinkler system. Emergency arrangement agreement request letters were last submitted to local emergency response agencies and contractors on April 2013 by certified mail. The facility's primary emergency coordinator is currently listed as Mr. Dietrich Fabricius and facility personnel confirmed that there have not been any incidents involving spills, releases, fires or explosions from management of hazardous waste since the time of last inspection.

### Training:

The facility has a hazardous waste training program in place. A written description of the topics reviewed during each training course was available for review. Mr. Dietrich Fabricius presents annual and initial RCRA training to employees through verbal review of the facility's RCRA training outline. The training outline includes a brief overview of hazardous waste management and handling procedures. The review includes several site specific hazardous waste management topics and specific contingency plan implementation topics. Mr. Fabricius explained that there are approximately 13-employees which are required to receive annual RCRA training for job functions. Mr. Fabricius presented RCRA training to 13-employees on January 4, 2016. RCRA job titles and job descriptions were available for employees involved in the management of hazardous waste. Mr. Fabricius has been assigned as the facility's hazardous waste contact.

Biennial Report:

The facility's 2013 Biennial Hazardous Waste Report was submitted on February 28, 2014. The report was available for review at the time of the inspection.

Contingency Plan:

The facility maintains a RCRA contingency plan on-site. The plan was last revised on April 26, 2013. The plan lists Mr. Fabricius as the facility's primary RCRA emergency coordinator. The plan includes the coordinator names and home addresses. The plan includes a facility diagram, which lists the type and location of emergency equipment as well as capabilities of the equipment. The plan also lists the emergency response procedures for the sites emergency coordinators. The plan describes the evacuation process, emergency alarms, and basic emergency response procedures and includes a list of contingency plan revisions. Emergency response agencies have toured the facility. The Fire Marshall, Fire Chief, Brevard Rescue Department Chief, and a Police Department Lieutenant acknowledged their visit by their sign off on May 14, 2013. The Director of Facilities for the Transylvania County Hospital Emergency Facilities signed off on May 22, 2013.

Hazardous Waste Satellite Accumulation Areas (SAAs):

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

The facility operates one-gallon satellite accumulation containers at each bench. Each has been fitted with a closure top funnel to allow the containers to be closed. The facility has one 55-gallon container holding F002/ F003 solids with Methylene chloride. The container was labeled with words to identify its contents and closed.

Hazardous Waste Storage Area:

The facility maintains the following hazardous waste storage area:

The hazardous waste storage area is a 20' X 20' limited access room with a concrete containment floor and special ventilation. Emergency equipment and phone service were available. At the time of inspection two 55-gallon containers holding waste solvents and two 55-gallon containers accumulating solvent waste were in storage. Each was labeled. Dated and closed as required.

Site Deficiencies: No violations of applicable regulations were observed during this inspection.



---

**JEFF MENZEL, / 02/29/2016**  
**NC HWS-COMPLIANCE BRANCH**

**SENT BY EMAIL**  
**ROBERT FRISBEE**

cc:  
Brent Burch, Compliance Branch Head  
Central Office Files

Jeff Menzel- NC Hazardous Waste Section  
Home Duty Office: P.O. Box 1568, Black Mountain, NC 28711  
Phone: 828-419-5034 Email: jeff.menzel@ncdenr.gov  
<http://portal.ncdenr.org/web/wm/hw>