

Scan Company Number: HW CB 2016 109

DEQ/DWM/Hazardous Waste Section

NCD/NCR Number: NCD 000 608 117

Full Facility Name: Celanese Acetate

City: Charlotte

County: Mecklenburg

Dates of File: _____

Document Type (s)

- Inspection Reports
- *Ticket NOV
- *LF & IMA NOV
- *Settlement Agreement
- *Compliance Orders
- *(In Comment Section Provide Docket Number and Date of Action)
- Correspondence/Letters
- Confidential
- Pictures
- Other Information (See Comment Section)
- Box Number

Comments:

NIOV'S
2001-165 7-11-2001
93-279 6-28-1993
92-409 12-7-1992
89-060

Region 4 Compliance Data Entry Form - Side A

(Rev. 8/97)

FACILITY INFORMATION:	Submittal Information	Initial By- Date -	Corrected By- Date -
	EPA ID Number: <u>NC0000608117</u>	RCRA Comp. Section: _____ / ___ / ___	Received: Entered/ Returned: _____ / ___ / ___

Facility Name: Celavese Acetate LLC City: Charlotte, NC

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: <u>S</u>	Date: <u>10/27/11</u> / <u>11</u> / <u>01</u>	Type: <u>CSE</u>	Control Number Data Entry Personnel
Person: <u>0319</u>	Reason: <u>11</u>	<u>CSE</u>	

Evaluation Comments:

(74) 1 : Ticket NOV issued from MRO Audit # 2001-165
2 : Facility in compliance

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) Date of determination:
 - a SNC (SNY evaluation) Same as above eval.: - or -
 - no longer a SNC (SNN eval.) / /

VIOLATION DATA: New: Change: Delete:

1 Agency: S Type: GIPIT Date (mdy) Determined: 10/27/11/01 Class:
 Priority: Branch: 011 Person: 0319 Seq. Number (Data Entry):
 Return to Compliance: 10/28/12/01 10/19/11/01
 Reg. Type: SIR Reg. Description (30): 40CFR 262.34(A)(4) ref. 265.52(d) - home
 Comment (72): addressed in cont. plan - Facility in compliance

2 Agency: S Type: GIPIT Date (mdy) Determined: 10/27/11/01 Class:
 Priority: Branch: 011 Person: 0319 Seq. Number (Data Entry):
 Return to Compliance: 10/28/12/01 10/19/11/01
 Reg. Type: SIR Reg. Description (30): 40CFR 262.34(A)(4) ref. 265.53(d) - capital
 Comment (72): updated plan to local auth. Facility in compliance

3 Agency: S Type: GIPIT Date (mdy) Determined: 10/27/11/01 Class:
 Priority: Branch: 011 Person: 0319 Seq. Number (Data Entry):
 Return to Compliance: 10/19/12/01 10/19/11/01
 Reg. Type: SIR Reg. Description (30): 40CFR 262.34(A)(4) ref. 265.54(d) - amend
 Comment (72): cont. plan upon changes to em. coord. Facility in compliance

RCRA REINSPECTION REPORT

COPY

1. **Facility Information:** Celanese Acetate, LLC
2300 Archdale Drive
Charlotte, N.C. 28210
NCD 000 608 117, Large Quantity Generator
2. **Facility Contact:** Ms. Kimberly Stone, Environmental Manager, ERM
704.554.3020
3. **Survey Participants:** Ms. Kimberly Stone
Mr. Joe Ramsey, Staff Engineer
Mr. Brad Murphy, Waste Management Specialist
4. **Date of Reinspection:** September 13, 2001
5. **Purpose of Inspection:** To determine compliance with NOV Docket # 2001-165.
6. **Facility Description:**

Celanese Acetate (Celanese) conducts research and development for various products manufactured by the corporation. At the present time, the facility is ceasing operations at a number of their process areas where hazardous waste was, at one time, generated.

7. Type Waste:

- D001/F003, Waste flammable liquids (acetone, cellulose acetate)
- D001/D002/F003, Waste flammable liquids (acetone, sulfuric acid)
- D001/F003, Waste flammable liquids (acetone, isopropanol)
- D002, Waste corrosive liquid, acidic, organic (acetic acid, cellulose acetate)
- D001/D002/F002/F003, Waste flammable liquids (methanol, methylene chloride)
- D001, Waste compressed gases (petroleum distillates)
- U002, Waste flammable liquids (acetone)
- F003, Waste flammable solids, organic (acetone)
- U226, Waste toxic, liquids, organic (chloroform, TCA)
- D009, Waste mercury
- D001, Waste flammable liquids
- F003, Waste flammable liquids (m-cresol)
- F004, Waste toxic solids (cresol)
- U080, Waste toxic, liquids (dimethylacetamide, methylene chloride)
- D001, Waste ethylenediamine
- D001/D035/F003/F005, Waste flammable liquids (acetone, methanol)
- D003, Waste lithium battery

- D001/D003/U135, Waste hydrogen sulfide
- D002, Waste corrosive liquids, basic (potassium hydroxide, potassium silicate)
- D001/D002/F003, RQ Waste flammable liquids (acetone, sodium hydroxide)
- D001/F003, RQ Waste flammable liquids (ethanol)
- D001/D007, Waste chromic acid
- D001/D002/D018/D038/F003/F005, RQ Waste flammable liquids (ethanol, potassium hydroxide)
- D001/D007, RQ Waste oxidizing solid (bromochlorohydantoin)
- D001, RQ Waste flammable liquids (ethanol, mineral spirits)
- D001, Waste styrene monomer
- D002, Waste corrosive liquid (phosphoric acid)
- D002, Waste corrosive liquid (potassium silicate)
- D001/F003/F005, Waste flammable liquids (octanone)
- F005/U188, Waste phenol
- F002/U188, Waste toxic liquids (phenol, carbon tetrachloride)
- D002, Waste corrosive liquid (acetic acid, trifluoroacetic acid)
- D003/P030, Waste cyanides

8. Areas of Inspection:

Manifests:

The facility's hazardous waste manifests were reviewed since the last inspection on November 10, 1998. Of the hazardous waste manifests reviewed, all were found in good order, had approved transporters and TSDs, had signed copies and were accompanied with Land Disposal Restriction certifications.

Transporters: Tri-State Motor Transit - MOD 095 038 998
Advanced Environmental Tech. Svcs - NJD 080 631 369
Onyx Environmental Services - NJD 080 631 369

TSDs: Advance Environmental Tech. Svcs - NCD 986 166 338
Onyx Environmental Services - NCD 986 166 338
Chemical Waste Management - ALD 000 622 464

Waste Minimization:

The facility's waste minimization plan includes inventory control, operating procedures, raw material modification, and product substitution. It should be noted that because Celanese operates as an R&D facility, one of their goals is to minimize waste, which includes the waste generated from their own processes.

Weekly Inspections:

The facility maintains documentation on weekly inspections conducted at the hazardous waste storage area as well as the waste accumulation points.

Contingency Plan:

Celanese maintains a contingency plan on-site. It was noted that since the last inspection, the facility has updated their contingency plan, which is incorporated into the SPCC plan. Ms. Pem Carter was previously listed as an emergency coordinator, but left the facility in approximately August of 2000. At the time of the inspection, it was discovered that the facility was in the process of updating the contingency plan, where they listed Ms. Stone as an emergency coordinator to replace Ms. Carter. The revisions to the plan were dated for May of 2001, but have not received corporate approval to formally amend the contingency plan. Subsequently, the changes to the emergency coordinator have not been added to the contingency plan, and these amendments have not been submitted to local authorities whose services would be requested during an emergency.

The contingency plan also did not include the home addresses of all persons listed as emergency coordinator. Mr. Ramsey and Ms. Stone explained that the home addresses, and other pertinent contact information, are given to those individuals (security personnel) within the facility complex that are responsible for reporting emergencies. They also explained that all emergency reporting is routed through the security posts, and that information on the emergency coordinators is readily available to all personnel at those posts. I explained that the contingency plan should be an all-inclusive and stand-alone document, and that the home addresses for emergency coordinators, regardless of the reporting chain of command within the facility, needs to be included in the contingency plan, primarily for use by the local authorities responding to an emergency at the facility.

The contingency plan did contain evacuation procedures and the primary and secondary evacuation routes. The plan includes a list of all emergency equipment and their capabilities, and the locations of all fire extinguishers throughout the facility. The plan also describes the arrangements made with all local authorities whose services would be requested during an emergency.

Training:

Celanese has a hazardous waste training program. Because of the reduced hazardous waste generation and subsequent handling by Celanese employees, all waste management at the facility is conducted by either Ms. Stone or Waste Management, Incorporated. Waste Management employees assigned to the Celanese facility have received the appropriate training, and have job descriptions and job titles, specific to their duties at the Celanese Acetate location. In addition, Ms. Stone has received the appropriate training, and maintains her job description and title at the facility.

Biennial Report:

Celanese submitted the report on February 24, 2000 for waste generated in 1999.

Emergency Preparedness:

Celanese is maintained and operated to prevent releases of hazardous waste. Containers were in good condition with no evidences of releases. Containers were stored with adequate aisle space, were labeled and dated properly.

The facility has an internal alarm system used for the announcement of evacuation procedures, which are described in the contingency plan. These alarms are tested on an annual basis. Fire fighting equipment is located throughout the facility and is tested internally on a monthly basis. The locations of these fire extinguishers are depicted on a map, which is included in the contingency plan. Sprinkler systems and spill kits are also located throughout the facility. The sprinkler system maintains adequate water pressure and is tested yearly by Atlantic Coast, an independent contractor, as well as internally by Celanese. Spill kits are located throughout the facility, and are monitored for inventory as needed. At all locations where hazardous waste is either stored or accumulated, personnel have immediate access to both alarm devices and communication equipment.

Accumulation Areas:

Twelve (12) accumulation areas are present at the facility. The location and description of these areas follows:

1. Lab 177 - Three (3) 5-gallon containers used for the accumulation of hazardous waste. The containers were properly labeled and closed.
2. Lab 172 - One (1) 5-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
3. Lab 170 - Two (2) 5-gallon containers used for the accumulation of hazardous waste. The containers were properly labeled and closed.
4. Lab 171 - One (1) 5-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
5. Lab 168 - One (1) 5-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.

6. Pilot Plant acetone dope waste - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
7. Pilot Plant press filters - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
8. Pilot Plant bleed down - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
9. Pilot Plant 3rd Floor 1 - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
10. Pilot Plant 3rd Floor 2 - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
11. Pilot Plant 2nd Floor A - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
12. Pilot Plant 2nd Floor B - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.

Hazardous Waste Storage Areas:

There is one (1) hazardous waste storage area at the facility. The location and description of this area follows:

1. Hazardous Waste Storage Area - This area is a metal 3-sided building, which is diked with concrete. "Hazardous Waste" and "No Smoking" signs were present at the time of the inspection. Four (4) hazardous waste containers were stored in the building, all were properly labeled, closed, and dated for less than 90 days. Communication devices were present at the storage area.

9. Site Deficiencies: Note: At the time of the inspection, facility representatives specifically requested a compliance schedule of 60 days, based specifically on the fact that any and all changes to the contingency plan must be pre-approved through Celanese Acetate corporate offices. The 60-day compliance schedule was agreed upon by the inspector, and will be reflected in the Ticket Notice of Violation dated July 18, 2001.

- A. 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265, with Sections 265.16, and with 40 CFR 268.7(a)(4).

1. 40 CFR 265.52(d), adopted by reference at 15A NCAC 13A .0110, states that the (contingency) plan must list names, addresses, and phone numbers (office and home)

of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

Celanese Acetate is in violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.52(d), adopted by reference at 15A NCAC 13A .0110. During the inspection it was documented that Ms. Pem Carter was listed as an emergency coordinator, but left the company in approximately August of 2000. The facility did not remove Ms. Carter from the contingency plan as an emergency coordinator. At the time of the inspection, Ms. Stone indicated that the facility was in the process of updating their contingency plan, which replaced Ms. Carter with Ms. Stone as an emergency coordinator. These changes have not received corporate approval, and thus have not been formally added to the contingency plan. **On September 11, 2001, the Mooresville Regional Office received written confirmation that the contingency plan has been updated to reflect the changes in emergency coordinator at the facility. Facility in compliance.**

2. 40 CFR 265.53(b), adopted by reference at 15A NCAC 13A .0110, states that a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Celanese Acetate is in violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.53(b), adopted by reference at 15A NCAC 13A .0110. During the inspection it was documented that the facility made changes to the list of emergency coordinators, and did not submit an updated contingency plan reflecting these changes to all local authorities whose services are requested during an emergency. **On September 11, 2001, the Mooresville Regional Office received written confirmation that the facility has submitted an updated copy of the contingency plan to all pertinent local authorities. Facility in compliance.**

3. 40 CFR 265.54(d), adopted by reference at 15A NCAC 13A .0110, states that the contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

Celanese Acetate is in violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.54(d), adopted by reference at 15A NCAC 13A .0110. During the inspection it was documented that the facility made changes to their list of emergency coordinators, but did not immediately amend the contingency plan to reflect those

Celanese Acetate, LLC
September 13, 2001
Page 7 of 7

changes. On September 11, 2001, the Mooresville Regional Office received written confirmation that the facility has amended their contingency plan to reflect changes in the emergency coordinator. Facility in compliance.

 9/13/01

INSPECTOR (DATE)

CERTIFIED MAIL 7000 0600 0029 1355 8381
Return Receipt to Kimberly L. S. Watson

Celanese
A C E T A T E

September 5, 2001

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

NCDENR
DWM-HWS
919 N. Main Street
 Mooresville, North Carolina 28115

**Subject: Celanese Acetate, LLC – Dreyfus Research Park
2300 Archdale Drive Charlotte, NC 28210
NCD 000 608 117
Docket # 2001-165**



Please find this letter as written certification that Celanese Acetate, LLC located at 2300 Archdale Drive, Charlotte, North Carolina 28210 has complied with the following noted violations from Mr. Brad Murphy's July 11, 2001 N.C. Hazardous Waste Section facility inspection:

1. 40 CFR 262.34 (a) (4) ref. 265.52 (d)
2. 40 CFR 262.34 (a) (4) ref. 265.53 (b)
3. 40 CFR 262.34 (a) (4) ref. 265.54 (d)

The amended, updated Celanese Acetate, LLC – Dreyfus Research Park's Contingency Plan was sent to the following agencies by certified mail:

Battalion 5, Chief
Charlotte Fire Department
Station 16
6623 Park South Drive
Charlotte, NC 28210

Mr. Paul F. Betzold, FACHE
Executive Vice President & CEO
Presbyterian Hospital
200 Hawthorne Lane
Charlotte, NC 28233-3549

Mr. Bart Massey
Hazardous Materials Coordinator
Charlotte Mecklenburg Emergency Management Office
9th Floor
600 East 4th Street
Charlotte, North Carolina 28202-2852

 **Celanese**
Celanese Acetate LLC
A business of Celanese AG



Mr. D. R. Stone
Chief
Charlotte Law Enforcement
825 East 4th Street
Charlotte, North Carolina 28202

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

Mr. Richard L. Dean
Operations Manager
Mecklenburg County Emergency Medical Services
618 North College Street
Charlotte, North Carolina 28202

Mr. Curtis Copenhaver
Administrator
Mercy Hospital
201 Vail Avenue
Charlotte, North Carolina 28207

Please find enclosed with this letter a copy of each cover letter that was submitted with the Celanese Acetate, LLC Contingency Plan to the above emergency service groups. These copies should provide the requested supporting documentation and confirmation that the noted compliance schedule of September 20, 2001 has been completed.

Celanese Acetate is committed to ensuring compliance with all County, State, and Federal regulations. Should there be a need for further discussion pertaining to this Notice of Violation, please feel free to call me at 704/554-3739.

Sincerely,

CELANESE ACETATE, LLC

A handwritten signature in dark ink that reads "Joe D. Ramsey".

Joe D. Ramsey
Site Services Section Leader

KLSW

Enclosure

CERTIFIED MAIL 7000 0600 0029 1355 8404
Return Receipt to Kimberly L. S. Watson

Celanese
A C E T A T E

September 5, 2001

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

Mr. Curtis Copenhaver
Administrator
Mercy Hospital
201 Vail Avenue
Charlotte, North Carolina 28207

**Subject: Celanese Acetate LLC – Dreyfus Research Park
2300 Archdale Drive Charlotte, NC 28210
Emergency Response Plan and Spill Prevention Control and
Countermeasures Plan (SPCC)**

Dear Mr. Copenhaver:

Please find enclosed a copy of the Celanese Acetate's Emergency Response and the Spill Prevention Control and Countermeasures Plan for the Dreyfus Research Park located at 2300 Archdale Drive in Charlotte, North Carolina. Any previous editions of these plans should be discarded and replaced with the enclosed copies.

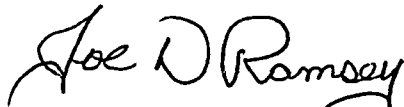
The Emergency Response Plan is required pursuant to the Environmental Protection Agency's rules for Hazardous Waste Generators, as defined in the Code of Federal Regulations, CFR 40, Part 264, Subpart D. In accordance with this Subpart, copies of this Plan must be submitted to all local police departments, fire departments, hospitals, and State, and Local emergency response teams that may be called upon to provide emergency services in an event involving outside assistance in the implementation of this Plan. This Plan must also describe the arrangements agreed by those outside departments and organizations, such as yours, in coordinating emergency services to our site in the event of such an emergency.

The Spill Prevention Control and Countermeasure Plan is required pursuant to the local Charlotte Mecklenburg Utilities Department. In accordance with this requirement, copies of this plan should be submitted to all local police departments, fire departments, hospitals, Charlotte Mecklenburg Utilities Department and emergency response teams that may be called upon in an event.

Celanese Acetate appreciates your cooperation in maintaining a copy of this Plan at your organization's office. If you should have any questions regarding the necessity for such or the Plan itself, please call 704/554-2000.

Sincerely,

CELANESE ACETATE LLC



Joe D. Ramsey
Site Services Section Leader

Enclosure

 **Celanese**
Celanese Acetate LLC
A business of Celanese AG

CERTIFIED MAIL 7000 0600 0029 1355 8411
Return Receipt to Kimberly L. S. Watson

Celanese
A C E T A T E

September 5, 2001

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

Mr. Richard L. Dean
Operations Manager
Mecklenburg County Emergency Medical Services
618 North College Street
Charlotte, North Carolina 28202

**Subject: Celanese Acetate LLC – Dreyfus Research Park
2300 Archdale Drive Charlotte, NC 28210
Emergency Response Plan and Spill Prevention Control and
Countermeasures Plan (SPCC)**

Dear Mr. Dean:

Please find enclosed a copy of the Celanese Acetate's Emergency Response and the Spill Prevention Control and Countermeasures Plan for the Dreyfus Research Park located at 2300 Archdale Drive in Charlotte, North Carolina. Any previous editions of these plans should be discarded and replaced with the enclosed copies.

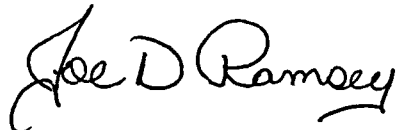
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Celanese Acetate appreciates your cooperation in maintaining a copy of this Plan at your organization's office. If you should have any questions regarding the necessity for such or the Plan itself, please call 704/554-2000.

Sincerely,

CELANESE ACETATE LLC



Joe D. Ramsey
Site Services Section Leader

Enclosure

 **Celanese**

Celanese Acetate LLC
A business of Celanese AG

CERTIFIED MAIL 7000 0600 0029 1356 0568
Return Receipt to Kimberly L. S. Watson

Celanese
A C E T A T E

September 5, 2001

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

Mr. D. R. Stone
Chief
Charlotte Law Enforcement
825 East 4th Street
Charlotte, North Carolina 28202

**Subject: Celanese Acetate LLC – Dreyfus Research Park
2300 Archdale Drive Charlotte, NC 28210
Emergency Response Plan and Spill Prevention Control and
Countermeasures Plan (SPCC)**

Dear Mr. Stone:

Please find enclosed a copy of the Celanese Acetate's Emergency Response and the Spill Prevention Control and Countermeasures Plan for the Dreyfus Research Park located at 2300 Archdale Drive in Charlotte, North Carolina. Any previous editions of these plans should be discarded and replaced with the enclosed copies.

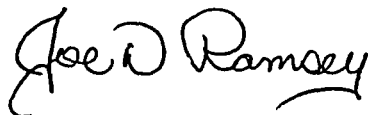
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Sincerely,

CELANESE ACETATE LLC



Joe D. Ramsey
Site Services Section Leader

Enclosure

 **Celanese**
Celanese Acetate LLC
A business of Celanese AG

CERTIFIED MAIL 7000 0600 0029 1356 0575
Return Receipt to Kimberly L. S. Watson

Celanese
A C E T A T E

September 5, 2001

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

Mr. Bart Massey
Hazardous Materials Coordinator
Charlotte Mecklenburg Emergency Management Office
9th Floor
600 East 4th Street
Charlotte, North Carolina 28202-2852

**Subject: Celanese Acetate LLC – Dreyfus Research Park
2300 Archdale Drive Charlotte, NC 28210
Emergency Response Plan and Spill Prevention Control and
Countermeasures Plan (SPCC)**

Dear Mr. Massey:

Please find enclosed a copy of the Celanese Acetate's Emergency Response and the Spill Prevention Control and Countermeasures Plan for the Dreyfus Research Park located at 2300 Archdale Drive in Charlotte, North Carolina. Any previous editions of these plans should be discarded and replaced with the enclosed copies.

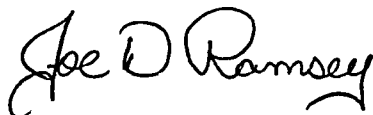
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The Spill Prevention Control and Countermeasure Plan is required pursuant to the local Charlotte Mecklenburg Utilities Department. In accordance with this requirement, copies of this plan should be submitted to all local police departments, fire departments, hospitals, Charlotte Mecklenburg Utilities Department and emergency response teams that may be called upon in an event.

Celanese Acetate appreciates your cooperation in maintaining a copy of this Plan at your organization's office. If you should have any questions regarding the necessity for such or the Plan itself, please call 704/554-2000.

Sincerely,

CELANESE ACETATE LLC



Joe D. Ramsey
Site Services Section Leader

Enclosure

 **Celanese**
Celanese Acetate LLC
A business of Celanese AG

CERTIFIED MAIL 7000 0600 0029 1356 0582
Return Receipt to Kimberly L. S. Watson

Celanese
A C E T A T E

September 5, 2001

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

Mr. Paul F. Betzold, FACHE
Executive Vice President & CEO
Presbyterian Hospital
200 Hawthorne Lane
Charlotte, NC 28233-3549

**Subject: Celanese Acetate LLC – Dreyfus Research Park
2300 Archdale Drive Charlotte, NC 28210
*Emergency Response Plan and Spill Prevention Control and
Countermeasures Plan (SPCC)***

Dear Mr. Betzold:

Please find enclosed a copy of the Celanese Acetate's Emergency Response and the Spill Prevention Control and Countermeasures Plan for the Dreyfus Research Park located at 2300 Archdale Drive in Charlotte, North Carolina. Any previous editions of these plans should be discarded and replaced with the enclosed copies.

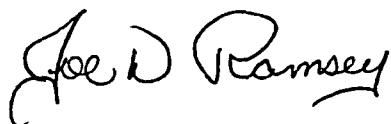
The Emergency Response Plan is required pursuant to the Environmental Protection Agency's rules for Hazardous Waste Generators, as defined in the Code of Federal Regulations, CFR 40, Part 264, Subpart D. In accordance with this Subpart, copies of this Plan must be submitted to all local police departments, fire departments, hospitals, and State, and Local emergency response teams that may be called upon to provide emergency services in an event involving outside assistance in the implementation of this Plan. This Plan must also describe the arrangements agreed by those outside departments and organizations, such as yours, in coordinating emergency services to our site in the event of such an emergency.

The Spill Prevention Control and Countermeasure Plan is required pursuant to the local Charlotte Mecklenburg Utilities Department. In accordance with this requirement, copies of this plan should be submitted to all local police departments, fire departments, hospitals, Charlotte Mecklenburg Utilities Department and emergency response teams that may be called upon in an event.

Celanese Acetate appreciates your cooperation in maintaining a copy of this Plan at your organization's office. If you should have any questions regarding the necessity for such or the Plan itself, please call 704/554-2000.

Sincerely,

CELANESE ACETATE LLC



Joe D. Ramsey
Site Services Section Leader

Enclosure

 **Celanese**
Celanese Acetate LLC
A business of Celanese AG

CERTIFIED MAIL 7000 0600 0029 1355 8398
Return Receipt to Kimberly L. S. Watson

Celanese
A C E T A T E

September 5, 2001

Celanese Acetate LLC
P.O. Box 32414
Charlotte, NC 28232-2414
704 554 2000

Battalion 5, Chief
Charlotte Fire Department
Station 16
6623 Park South Drive
Charlotte, NC 28210

**Subject: Celanese Acetate LLC – Dreyfus Research Park
2300 Archdale Drive Charlotte, NC 28210
*Emergency Response Plan and Spill Prevention Control and
Countermeasures Plan (SPCC)***

Dear Chief:

Please find enclosed a copy of the Celanese Acetate's Emergency Response and the Spill Prevention Control and Countermeasures Plan for the Dreyfus Research Park located at 2300 Archdale Drive in Charlotte, North Carolina. Any previous editions of these plans should be discarded and replaced with the enclosed copies.

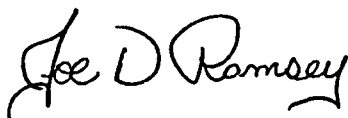
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Celanese Acetate appreciates your cooperation in maintaining a copy of this Plan at your organization's office. If you should have any questions regarding the necessity for such or the Plan itself, please call 704/554-2000.

Sincerely,

CELANESE ACETATE LLC



Joe D. Ramsey
Site Services Section Leader

Enclosure

 **Celanese**

Celanese Acetate LLC
A business of Celanese AG



Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Interim Director

HAZARDOUS WASTE SECTION
NOTICE OF VIOLATION

To:	Ms. Kimberly Stone	Docket:	#2001-165
Address:	Celanese Acetate, LLC 2300 Archdale Drive Charlotte, North Carolina 28210	Inspection Date:	July 11, 2001
EPA ID#:	NCD 000 608 117	Facility Type:	Generator

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (Act), N.C.G.S. 130A; Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.


On July 11, 2001, Mr. Brad Murphy, representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection the following violations were noted:

- | <u>Citation</u> | <u>Specifics</u> |
|-----------------|---|
| 1. | 40 CFR 262.34 (a)(4) ref. 265.52(d) - The contingency plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. Specifically, the facility failed to include the home addresses of all persons listed as emergency coordinator in the contingency plan. |
| 2. | 40 CFR 262.34(a)(4) ref. 265.53(b) - A copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. Specifically, the facility made changes to the list of emergency coordinators, and did not submit an updated contingency plan reflecting these changes to all local authorities whose services are requested during an emergency. |
| 3. | 40 CFR 262.34(a)(4) ref. 265.54(d) - The contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes. Specifically, the facility failed to immediately update the contingency upon changes to the list of emergency coordinators. |

At the request of the facility, because changes to the contingency plan must be pre-approved by Celanese Acetate corporate offices, you are hereby required to comply with the noted violation(s) by September 20, 2001. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B.0701-.0707, an administrative penalty of up to \$27,500.00 per day may be assessed for violation of the hazardous waste law or regulations.

In further satisfaction of Docket #2001-165, Celanese Acetate shall provide a written certification with supporting documentation on company letterhead confirming the noted compliance schedule has been completed. Mail this certification to NCDENR, DWM-HWS, 919 N. Main Street, Mooresville, N.C. 28115 by the noted compliance date.

7/18/01
(Date)


N.C. Hazardous Waste Section

919 North Main Street, Mooresville, North Carolina 28115
Phone: 704-663-1699 \ FAX: 704-663-6040 \ Internet: www.enr.state.nc.us

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CELANESE ACETATE LLC
 2300 ARCHDALE DRIVE
 CHARLOTTE NC 28210
 ATTENTION MS KIMBERLY STONE
 bdm nov 7/25/01 hazardous waste

2. Article Number (Copy from service label)

7000 1670 0001 5513 6262

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

TERRY LOCKE 7-26

C. Signature

X Terry Locke

- Agent
- Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

7000 1670 0001

return receipt fee (Endorsement Required)

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees \$ 4.17

CELANESE ACETATE LLC
 2300 ARCHDALE DRIVE
 CHARLOTTE NC 28210
 ATTENTION MS KIMBERLY STONE
 bdm nov 7/25/01 hazardous waste

PS Form 3800, May 2000

JUL 25 2001

See Reverse for Instructions

Celanese Acetate, LLC
July 18, 2001
Page 2 of 2

I, Bradley D. Murphy, hereby certify that I have personally served a copy of this Notice on: Ms. Kimberly Stone at Celanese Acetate, North Carolina by certified mail.

SENT CERTIFIED MAIL
(Recipient Signature)

copies to: Jesse Wells
central files

RCRA INSPECTION REPORT

1. **Facility Information:** Celanese Acetate, LLC
2300 Archdale Drive
Charlotte, N.C. 28210
NCD 000 608 117, Large Quantity Generator
2. **Facility Contact:** Ms. Kimberly Stone, Environmental Manager, ERM
704.554.3020
3. **Survey Participants:** Ms. Kimberly Stone
Mr. Joe Ramsey, Staff Engineer
Mr. Brad Murphy, Waste Management Specialist
4. **Date of Inspection:** July 11, 2001
5. **Purpose of Inspection:** To determine compliance with 40 CFR 262, 265, and 268.
6. **Facility Description:**

Celanese Acetate (Celanese) conducts research and development for various products manufactured by the corporation. At the present time, the facility is ceasing operations at a number of their process areas where hazardous waste was, at one time, generated.

7. Type Waste:

- D001/F003, Waste flammable liquids (acetone, cellulose acetate)
- D001/D002/F003, Waste flammable liquids (acetone, sulfuric acid)
- D001/F003, Waste flammable liquids (acetone, isopropanol)
- D002, Waste corrosive liquid, acidic, organic (acetic acid, cellulose acetate)
- D001/D002/F002/F003, Waste flammable liquids (methanol, methylene chloride)
- D001, Waste compressed gases (petroleum distillates)
- U002, Waste flammable liquids (acetone)
- F003, Waste flammable solids, organic (acetone)
- U226, Waste toxic, liquids, organic (chloroform, TCA)
- D009, Waste mercury
- D001, Waste flammable liquids
- F003, Waste flammable liquids (m-cresol)
- F004, Waste toxic solids (cresol)
- U080, Waste toxic, liquids (dimethylacetamide, methylene chloride)
- D001, Waste ethylenediamine
- D001/D035/F003/F005, Waste flammable liquids (acetone, methanol)
- D003, Waste lithium battery

- D001/D003/U135, Waste hydrogen sulfide
- D002, Waste corrosive liquids, basic (potassium hydroxide, potassium silicate)
- D001/D002/F003, RQ Waste flammable liquids (acetone, sodium hydroxide)
- D001/F003, RQ Waste flammable liquids (ethanol)
- D001/D007, Waste chromic acid
- D001/D002/D018/D038/F003/F005, RQ Waste flammable liquids (ethanol, potassium hydroxide)
- D001/D007, RQ Waste oxidizing solid (bromochlorohydrantoin)
- D001, RQ Waste flammable liquids (ethanol, mineral spirits)
- D001, Waste styrene monomer
- D002, Waste corrosive liquid (phosphoric acid)
- D002, Waste corrosive liquid (potassium silicate)
- D001/F003/F005, Waste flammable liquids (octanone)
- F005/U188, Waste phenol
- F002/U188, Waste toxic liquids (phenol, carbon tetrachloride)
- D002, Waste corrosive liquid (acetic acid, trifluoroacetic acid)
- D003/P030, Waste cyanides

8. Areas of Inspection:

Manifests:

The facility's hazardous waste manifests were reviewed since the last inspection on November 10, 1998. Of the hazardous waste manifests reviewed, all were found in good order, had approved transporters and TSDs, had signed copies and were accompanied with Land Disposal Restriction certifications.

Transporters: Tri-State Motor Transit - MOD 095 038 998
Advanced Environmental Tech. Svcs - NJD 080 631 369
Onyx Environmental Services - NJD 080 631 369

TSDs: Advance Environmental Tech. Svcs - NCD 986 166 338
Onyx Environmental Services - NCD 986 166 338
Chemical Waste Management - ALD 000 622 464

Waste Minimization:

The facility's waste minimization plan includes inventory control, operating procedures, raw material modification, and product substitution. It should be noted that because Celanese operates as an R&D facility, one of their goals is to minimize waste, which includes the waste generated from their own processes.

Weekly Inspections:

The facility maintains documentation on weekly inspections conducted at the hazardous waste storage area as well as the waste accumulation points.

Contingency Plan:

Celanese maintains a contingency plan on-site. It was noted that since the last inspection, the facility has updated their contingency plan, which is incorporated into the SPCC plan. Ms. Pem Carter was previously listed as an emergency coordinator, but left the facility in approximately August of 2000. At the time of the inspection, it was discovered that the facility was in the process of updated the contingency plan, where they listed Ms. Stone as an emergency coordinator to replace Ms. Carter. The revisions to the plan were dated for May of 2001, but have not received corporate approval to formally amend the contingency plan. Subsequently, the changes to the emergency coordinator have not been added to the contingency plan, and these amendments have not been submitted to local authorities whose services would be requested during an emergency.

The contingency plan also did not include the home addresses of all persons listed as emergency coordinator. Mr. Ramsey and Ms. Stone explained that the home addresses, and other pertinent contact information, are given to those individuals (security personnel) within the facility complex that are responsible for reporting emergencies. They also explained that all emergency reporting is routed through the security posts, and that information on the emergency coordinators is readily available to all personnel at those posts. I explained that the contingency plan should be an all-inclusive and stand-alone document, and that the home addresses for emergency coordinators, regardless of the reporting chain of command within the facility, needs to to be included in the contingency plan, primarily for use by the local authorities responding to an emergency at the facility.

The contingency plan did contain evacuation procedures and the primary and secondary evacuation routes. The plan includes a list of all emergency equipment and their capabilities, and the locations of all fire extinguishers throughout the facility. The plan also describes the arrangements made with all local authorities whose services would be requested during an emergency.

Training:

Celanese has a hazardous waste training program. Because of the reduced hazardous waste generation and subsequent handling by Celanese employees, all waste management at the facility is conducted by either Ms. Stone or Waste Management, Incorporated. Waste Management employees assigned to the Celanese facility have received the appropriate training, and have job descriptions and job titles, specific to their duties at the Celanese Acetate location. In addition, Ms. Stone has received the appropriate training, and maintains her job description and title at the facility.

Biennial Report:

Celanese submitted the report on February 24, 2000 for waste generated in 1999.

Emergency Preparedness:

Celanese is maintained and operated to prevent releases of hazardous waste. Containers were in good condition with no evidences of releases. Containers were stored with adequate aisle space, were labeled and dated properly.

The facility has an internal alarm system used for the announcement of evacuation procedures, which are described in the contingency plan. These alarms are tested on an annual basis. Fire fighting equipment is located throughout the facility and is tested internally on a monthly basis. The locations of these fire extinguishers are depicted on a map, which is included in the contingency plan. Sprinkler systems and spill kits are also located throughout the facility. The sprinkler system maintains adequate water pressure and is tested yearly by Atlantic Coast, an independent contractor, as well as internally by Celanese. Spill kits are located throughout the facility, and are monitored for inventory as needed. At all locations where hazardous waste is either stored or accumulated, personnel have immediate access to both alarm devices and communication equipment.

Accumulation Areas:

Twelve (12) accumulation areas are present at the facility. The location and description of these areas follows:

1. Lab 177 - Three (3) 5-gallon containers used for the accumulation of hazardous waste. The containers were properly labeled and closed.
2. Lab 172 - One (1) 5-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
3. Lab 170 - Two (2) 5-gallon containers used for the accumulation of hazardous waste. The containers were properly labeled and closed.
4. Lab 171 - One (1) 5-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
5. Lab 168 - One (1) 5-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
6. Pilot Plant acetone dope waste - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.

7. Pilot Plant press filters - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
8. Pilot Plant bleed down - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
9. Pilot Plant 3rd Floor 1 - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
10. Pilot Plant 3rd Floor 2 - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
11. Pilot Plant 2nd Floor A - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.
12. Pilot Plant 2nd Floor B - One (1) 55-gallon container used for the accumulation of hazardous waste. The container was properly labeled and closed.

Hazardous Waste Storage Areas:

There is one (1) hazardous waste storage area at the facility. The location and description of this area follows:

1. Hazardous Waste Storage Area - This area is a metal 3-sided building, which is diked with concrete. "Hazardous Waste" and "No Smoking" signs were present at the time of the inspection. Four (4) hazardous waste containers were stored in the building, all were properly labeled, closed, and dated for less than 90 days. Communication devices were present at the storage area.

9. Site Deficiencies: Note: At the time of the inspection, facility representatives specifically requested a compliance schedule of 60 days, based specifically on the fact that any and all changes to the contingency plan must be pre-approved through Celanese Acetate corporate offices. The 60-day compliance schedule was agreed upon by the inspector, and will be reflected in the Ticket Notice of Violation dated July 18, 2001.

- A. 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265, with Sections 265.16, and with 40 CFR 268.7(a)(4).

1. 40 CFR 265.52(d), adopted by reference at 15A NCAC 13A .0110, states that the (contingency) plan must list names, addresses, and phone numbers (office and home)

of all persons qualified to act as emergency coordinator, and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

Celanese Acetate is in violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.52(d), adopted by reference at 15A NCAC 13A .0110. During the inspection it was documented that Ms. Pem Carter was listed as an emergency coordinator, but left the company in approximately August of 2000. The facility did not remove Ms. Carter from the contingency plan as an emergency coordinator. At the time of the inspection, Ms. Stone indicated that the facility was in the process of updating their contingency plan, which replaced Ms. Carter with Ms. Stone as an emergency coordinator. These changes have not received corporate approval, and thus have not been formally added to the contingency plan.

2. 40 CFR 265.53(b), adopted by reference at 15A NCAC 13A .0110, states that a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Celanese Acetate is in violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.53(b), adopted by reference at 15A NCAC 13A .0110. During the inspection it was documented that the facility made changes to the list of emergency coordinators, and did not submit an updated contingency plan reflecting these changes to all local authorities whose services are requested during an emergency.

3. 40 CFR 265.54(d), adopted by reference at 15A NCAC 13A .0110, states that the contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

Celanese Acetate is in violation of 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.54(d), adopted by reference at 15A NCAC 13A .0110. During the inspection it was documented that the facility made changes to their list of emergency coordinators, but did not immediately amend the contingency plan to reflect those changes.


INSPECTOR (DATE)

(sent certified mail)
FACILITY CONTACT

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: Glance Acetate LLC
Location: 2300 Archdale Drive Charlotte, NC 28210
Mailing Address: PO Box 32414 Charlotte, NC 28232
EPA ID#: NCD 006 608 117 Phone Number: 704.554.3020
Contact/Title: Kimberly Stone w/ERM
Inspection Date: 7/11/01 Last Inspection: 11/10/98
Status: LQG Type of Inspection: CEI
Inspector(s): Beard Murphy, Waste Management Specialist
Present at Inspection: Kim Stone
Type of Business: Research & development facility for various items the corp. manufactures.
Wastes Generated: Batteries (LiA & NiCd), Fluorescent lamps

Manifests: Approved Transporters ? Y Approved TSDF ? Y
Filled Out Correctly ? Yes Signed Copies ? Yes
LDR Notification Attached ? Yes, for all shipments
Manifest in good order

Waste Minimization: Yes, includes inventory control, operating procedures, raw material substitution, product substitute.

Inspection Records:
Evidence that inspections are conducted: Yes, weekly
Inspections on Storage Area: Yes, documented.
Inspections on H.W. Tanks: _____
Inspections on Ancillary Equipment: _____

Contingency Plan: Facility is currently updating cont. plan, updated plan revisions dated 4/00
On-Site ? Yes mm, 2001.
Any changes to facility/processes or Emergency Coordinator since last review? Yes, Pam Carter has been replaced by Mrs. Stone. Since the last CEI, the facility has revised their Cont./SPCC Plan. No home phone #'s or home addresses in plan. Updated coord. plan not sent to em. responders. No updated cont. plan upon change to em. coord. Plan dated 6/99 update on Contingency Plan Implemented? No (If yes, was it adequate?) 2/8/00
Describe alarms for evacuation. List & emergency equipment, inspected regularly. Has speedy-dry, fire pigs, PPE, etc. Spillcard invent. listed. Evac routes provided.
Agreements with Emergency Responders? Cont. plan has not been reviewed by local Auth. updated since department was. Carter must recent update.

Home phone #'s listed on chart at security post, but not in cont. plan.

Training Records:
Certified Training Documents Available? Yes, for materials Ms. Stone
New Employees Since Last Inspection? _____
Evidence of Improper/Inadequate Training? _____

Employee Interviews:
Name(s): _____ Trained? _____

Annual Report Submitted? 2/24/00

Wastestreams:

- F003 - Waste Flammable liquids (acetone, cellulose acetate) D001
F003 - Waste Flammable liquids (acetone, sulfuric acid) D001/D002
F003 - Waste flammable liquids (acetone, isopropanol) D001
D002 - Waste corrosive liquid, acidic, organic (acetic acid, cellulose acetate)
F003 - Waste flammable liquids (methanol, methylene chloride) F002, D001, D002
D001 - Waste compressed gases (petroleum distillates)
U002 - Waste flammable liquids (acetone)
F003 - Waste flammable solids, organic (acetone)
U226 - Waste toxic, liquids, organic (chloroform, TCA)
D009 - Waste mercury
Waste Batteries - L/A, NiCd
D001 - Waste flammable liquids
F003 - Waste flammable liquids (m-cresol)
F004 - Waste toxic solids (cresol)
U000 - Waste toxic, liquids (dimethylacetamide, methylene chloride)
D001 - Waste ethylenediamine
F003 / F005 / D001 / D035 - Waste flammable liquids (acetone, methanol)
D003 - Waste lithium battery
D001 - Waste hydrogen sulfide D003 U135
D002 - Waste corrosive liquid, basic (potassium hydroxide, potassium silicate)
D001 / D002 / F003 - RQ waste flammable liquids (acetone, sodium hydroxide)
D001 / F003 - RQ waste flammable liquids (ethanol)
D001 / D007 - Waste chromic acid
D001 / D002 / D038 / D018 / F003 / F005 - RQ waste flammable liquids (ethanol, potassium hydroxide)
D001 / D007 - RQ waste oxidizing solid (bromo chloro hydantoin)
D001 - RQ waste flammable liquids (ethanol, mineral spirit)
D001 - Waste styrene monomer
D002 - Waste corrosive liquid (phosphoric acid)
D002 - Waste corrosive liquid (potassium silicate)

- D001 / F003 / F005 - Waste flamm liquids (octanone)
F005 / U188 - Waste phenol
F002 / U188 - Waste toxic liquids (chloroform, carbon tetrachloride)
D002 - Waste corrosive liquid (acetic acid, triethano acetic acid)
D003 / D030 - Waste cyanides

Transporters:

- Advanced Env. Tech. Sves (AETS) - NJD 080 631 369
Onyx Env. Sves - NJD 080 631 369
Tri-State Motor Transit Co. - MOD 095 038 998

TSDs:

- AETS - NOD 986 166 338
Onyx Env. Sves - NCD 986 166 338
Chemical Waste Mgmt - ALD 000 622 464

Page Two - RCRA Inspection Report

Facility Name: Celanese Acetate

EPA ID#: NCD 000 608 117

Inspection Date: 7/11/01

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Yes, Facility
in good condition

Internal Communications or Alarm Present? Internal alarm present w/ pull-down
stations. Tested annually

Portable Fire Extinguishers and/or Fire Control Equipment? Fire extinguishers
located throughout, location depicted on map. Tested monthly

Spill Control Equipment: Located throughout. Inventoried internally for content.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? Yes, located
throughout facility. Tested yearly by Atlantic Coast & on fire pump eq. Tested monthly in-house.

All Equipment/Alarms Tested and Maintained? Pull-downs tested in-house
annually.

All Personnel Handling HW have Access to Alarm/Device? Yes, at all
locations.

Adequate Aisle Space in Areas of Facility Operation? Yes, at all locations

Satellite Accumulation Area(s):

Location(s): see reverse

Satellite Containers: Closed? Yes

Labeled/Contents Identified? Yes

< 55 Gallons? Yes

Releases? No

Storage Area(s):

Description(s): see reverse

Containers: Closed? Yes Aisle Space? Yes Labeled? Yes

Dated? Yes Evidence of Release? No

< 90 Days? Yes Good Condition? Yes

Other HW Units: (Applicable Regulations)

Description of Unit: N/A

External Facility Condition: Good

Accumulators:

- ① Lab 177 - 3 - 5 gallon containers. Labeled & closed.
- ② Lab 172 - 1 - 5 gallon container. Labeled & closed.
- ③ Lab 170 - 2 - 5 gallon containers. Labeled & closed.
- ④ Lab 171 - 1 - 5 gallon container. Labeled & closed.
- ⑤ Lab 168 - 1 - 5 gallon container. Labeled & closed.
- ⑥ Pilot Plant Acetone dope waste - 1.55 gallon container. Labeled & closed.
- ⑦ Pilot Plant press filters - 1.55 gallon container. Labeled & dated.
- ⑧ Pilot Plant Bleed down - 1.55 gallon container. Labeled & closed.
- ⑨ Pilot Plant 3rd Floor 1 - 1.55 gallon container. Labeled & closed.
- ⑩ Pilot Plant 3rd Floor 2 - 1.55 gallon container. Labeled & dated.
- ⑪ Pilot Plant 2nd Floor A - 1.55 gallon container. Labeled & closed.
- ⑫ Pilot Plant 2nd Floor B - 1.55 gallon container. Labeled & closed.

Storage:

Metal 5-sided building, diked. "No Smoking" & "No Open Flames" signs present.

4) Hazardous waste containers on site. All labeled & closed. Dated 690 days.

Page Three - RCRA Inspection Report

Facility Name: Colman Acetate

EPA ID#: NC0 000 608 117

Inspection Date: 7/11/01

Site Deficiencies: TBD

Recommendations: None

[Signature] 7/11/01
Inspector (Date)

[Signature] 7/11/01
Facility Contact (Date)

Follow Up Inspection:

Comments: _____

Inspector (Date)

Facility Contact (Date)

Region 4 Compliance Data Entry Form - Side A

(Rev.8/97)

FACILITY INFORMATION:	Submittal Information	Initial	Corrected
		By- Date -	By- Date -
EPA ID Number:	RCRA Comp. Section:	___ / ___ / ___	___ / ___ / ___
<u>NC00000608117</u>	Received:	___ / ___ / ___	___ / ___ / ___
	Entered/Returned:	___ / ___ / ___	___ / ___ / ___

Facility Name: CELANESE ACETATE LLC City: CHARLOTTE

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: S Date: 11/10/98 Type: CEI Control Number Data Entry Personnel:

Person: 0129 Reason:

Evaluation Comments:
 (74) 1 : No Violations
 2 :

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one) Date of determination:
 - a SNC (SNY evaluation)
 or - no longer a SNC (SNN eval.) Same as above eval.: - or - / /

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry):
 Return to Compliance: / / -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry):
 Return to Compliance: / / -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry):
 Return to Compliance: / / -- Scheduled -- --- Actual ---
 Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation date on Side B if necessary -

*** EPA Region 4 Compliance Data Entry Form -Side B *** (8/97)

Fill out facility information on Side A, then come back to this side.

ENFORCEMENT DATA: New: Change: Delete: (: Required)

Agency: Type: Date: / / Month Day Year Seq.# (Data Entry)

Person: Branch: Poll. Prev. Measures:

Penalty Data

Proposed: \$ <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	1) Payments: \$ <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Date Paid: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>
Settled/Final: \$ <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	2) \$ <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>

Enforcement Comments: 1: _____
(74)
2: _____

Cite violations addressed by this action below -

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class: Seq. Number (Data Entry)

Priority: Branch: Person: Return to Compliance: -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class: Seq. Number (Data Entry)

Priority: Branch: Person: Return to Compliance: -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class: Seq. Number (Data Entry)

Priority: Branch: Person: Return to Compliance: -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class: Seq. Number (Data Entry)

Priority: Branch: Person: Return to Compliance: -- Scheduled -- --- Actual --- / /

Reg. Type: Reg. Description (30): _____

Comment (72): _____

More violations for this enforcement action on other side ? Yes No

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: Celanese Acetate LLC
Location: 2300 Archdale Drive, Charlotte, N.C. 28210
Mailing Address: P.O. Box 32414, Charlotte, N.C. 28232
EPA ID#: NCD 000 608 117 Phone Number: 704-554-3020
Contact/Title: Pem Carter - Environmental Engineer
Inspection Date: Nov. 10, 1998 Last Inspection: Nov. 28, 1995
Status: LOG Type of Inspection: CEI
Inspector(s): Joseph Parker - Waste Management Specialist
Present at Inspection: Pem Carter - Environmental Engineer
Type of Business: Celanese Acetate LLC operates as a research and development facility for various items the company manufactures.

Wastes Generated: The following hazardous wastes were generated during the 1998 year:

F003 - Waste Flammable Liquids (acetone, sulfuric acid)
F003 - Waste Flammable Liquids (acetone, cellulose acetate)
F003 - Waste Flammable Liquids (methanol, acetone)
F003 - Waste Flammable Solids Organic (acetone)
D002 - Waste Toxic Liquid, Corrosive, Organic(o-chlorophenol)
F003 - Waste Toxic, Liquids, Organic (methylene chloride)
U080 - Waste Toxic Solids (methylene chloride)
D009 - Waste Mercury
D002 - Waste Caustic Alkali Liquids (sodium hydroxide)
D001 - Waste Flammable Liquids Toxic (nicotine)
F003 - Waste Flammable Liquid (pyridine)
U211 - Waste Toxic (carbon tetrachloride, phenol)
F002 - Hazardous Waste Liquid (1,1,2, trichloroethane, 1,2,2, trifluoroethane)

Fluorescent Light Bulbs - Recycled

Waste Batteries (acid, lithium) - Universal Waste

Other various lab chemicals used in the R&D operation

Manifests: Approved Transporters ? Yes Approved TSDF ? Yes
Filled Out Correctly ? Yes Signed Copies ? Yes
LDR Notification Attached ? Yes

The facility's 1998 hazardous waste manifests were in good order. They have a very good tracking system for hazardous waste manifests.

Transporters: Advanced Environmental Technical Services (AETS)
- NJD 080 631 369
Laidlaw Environmental Services - SCD 987 574 647

TSDs: Advanced Environmental Technical Services (AETS)
- NCD 986 166 338
Laidlaw Environmental Services - NCD 000 648 451

Waste Minimization: The facility's waste minimization efforts include a review of all materials for cost, quantity, and disposal methods. Also the facility looks to cut down on usage and how to

Page Two - RCRA Inspection Report

Facility Name: Celanese Acetate LLC

EPA ID#: NCD 000 608 117

Inspection Date: November 10, 1998

use efficiency and recycles batteries, fluorescent light bulbs, and all paper items.

Inspection Records:

Evidence that inspections are conducted: Yes, documented

Inspections on Storage Area: Yes, weekly

Inspections on H.W. Tanks: N/A

Inspections on Ancillary Equipment: N/A

Contingency Plan:

On-Site ? Yes

Any changes to facility/processes or Emergency Coordinator since last review? Facility is currently amending their contingency plan to show changes in emergency response positions at the facility.

Contingency Plan Implemented? No (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documented via Certified Mail

Training Records:

Certified Training Documents Available? Yes, training documented on April 2, 1998, April 7, 1998, July 15, 1997

New Employees Since Last Inspection? Yes, Bryan Fincher

Evidence of Improper/Inadequate Training? No

Annual Report Submitted? Yes, submitted hard copy to Raleigh

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Small amounts of dried material were observed on the sides of two containers located at two different satellite accumulation areas. This will be addressed in the recommendation section.

Internal Communications or Alarm Present? The facility has fire alarms for all buildings, a PA System for specific buildings, and walkie-talkies, pagers, and cell phones.

Portable Fire Extinguishers and/or Fire Control Equipment? The facility has fire equipment such as fire extinguishers and fire hoses throughout the site.

Spill Control Equipment: The facility has overpack drums, speedee dry, absorbent pigs, and PPE.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? The facility has Co2, foam system, ABC, and water sprinklers at the facility.

Page Three - RCRA Inspection Report
Facility Name: Celanese Acetate LLC
EPA ID#: NCD 000 608 117
Inspection Date: November 10, 1998

All Equipment/Alarms Tested and Maintained? Fire alarm is on a constant test and equipment is checked by a service.

All Personnel Handling HW have Access to Alarm/Device? Yes, pull down alarms throughout facility and a specific emergency number on the telephone.

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): 9
Location(s):

1. Cellulose Pilot Plant Floor 1, Room 109, Machine Filtration Room - 1,55 gallon container holding acetone/acetone dope waste. All requirements met.
2. Cellulose Pilot Plant Floor 1, Room 109, Machine Press Area - 1,55 gallon container holding hazardous waste press dressing. All requirements met.
3. Cellulose Pilot Plant Floor 1, Room 109B, Machine Mini-Header - 1,55 gallon container holding acetone/cellulose acetate waste. All requirements met.
4. Cellulose Pilot Plant Floor 2, Room 2004, Machine Mix Area - 1,55 gallon container holding D001/F003 acetone waste. *Evidence of a small amount of material on the outside of the container. None of the releases observed were noticed on the ground surrounding the container.
5. Cellulose Pilot Plant Floor 2, Room 2005, Machine Craft Lab - 1,55 gallon container observed empty. Container had just been changed out and is destined to hold D001/F003 acetone waste. Container was not labeled or closed. No violation because it was empty, but facility needs to be aware of the possibility. The facility contact labeled and closed the container before we moved on. All requirements met.
6. Cellulose Pilot Plant Floor 3, Room 3002, Machine Split-flow - 1,55 gallon container holding D001 acetone waste. All requirements met.
7. Cellulose Pilot Plant Floor 3, Room 3002, Machine Multi-Purpose - 1,55 gallon container holding D001 acetone waste. All requirements met.
8. Cellulose Pilot Plant Floor 3, Room 3002, Machine T-Metterer - 1,55 gallon container holding D001 acetone waste. All requirements met.

Page Four - RCRA Inspection Report

Facility Name: Celanese Acetate LLC

EPA ID#: NCD 000 608 117

Inspection Date: November 10, 1998

9. CA Drum Clean Area - 1,55 gallon container D001/F003 holding solubilized dope material. *Evidence of a small amount of material on the outside of the container. Unknown whether this material was product or waste. None of the releases observed were noticed on the ground surrounding the container. This area is used for both the consolidation of product material and hazardous waste satellite accumulation. Recommendation section will address this subject.

Satellite Containers: Closed? Yes
Labeled/Contents Identified? Yes
< 55 Gallons? Yes
Releases? Observed a small amount

Storage Area(s): 1

Description(s): The facility's 90 day storage area is located just south of the Engineering Building. During the inspection, 7-55 gallon containers of hazardous waste were in storage. All requirements met.

Containers: Closed? Yes Aisle Space? Yes Labeled? Yes
Dated? Yes Evidence of Release? None observed
< 90 Days? Yes Good Condition? Yes

Other HW Units: (Applicable Regulations)

Description of Unit: None

External Facility Condition: Good

Site Deficiencies: No Violations

Recommendations:

1. The facility needs to remind employees working in the Machine Mix Area and Drum Clean Area on releases of hazardous waste on sides of satellite accumulation containers. The small amounts observed were probably due to sloppy work habits. None of the releases observed were noticed on the ground surrounding the container. Employees should be reminded of company policy on hazardous waste handling, which was found in the facility's contingency plan. This recommendation has been documented for future compliance inspections at the site.
2. In reference to the Drum Cleaning Area, some releases were not distinguishable between product consolidation practices and hazardous waste generation. These operations may need to be separated to further investigate the cause of the releases and where they are occurring.

Page Five - RCRA Inspection Report

Facility Name: Celanese Acetate LLC

EPA ID#: NCD 000 608 117

Inspection Date: November 10, 1998

Recommendations (cont'd):

3. Once employees have been presented with the results of this inspection, the inspector has requested that the facility send a letter stating the items discussed and what actions are being taken to correct the situation.

If the facility has any questions regarding this inspection report, or any question concerning hazardous waste regulations, please feel free to contact me at the Mooresville Regional Office at (704) 663-1699.

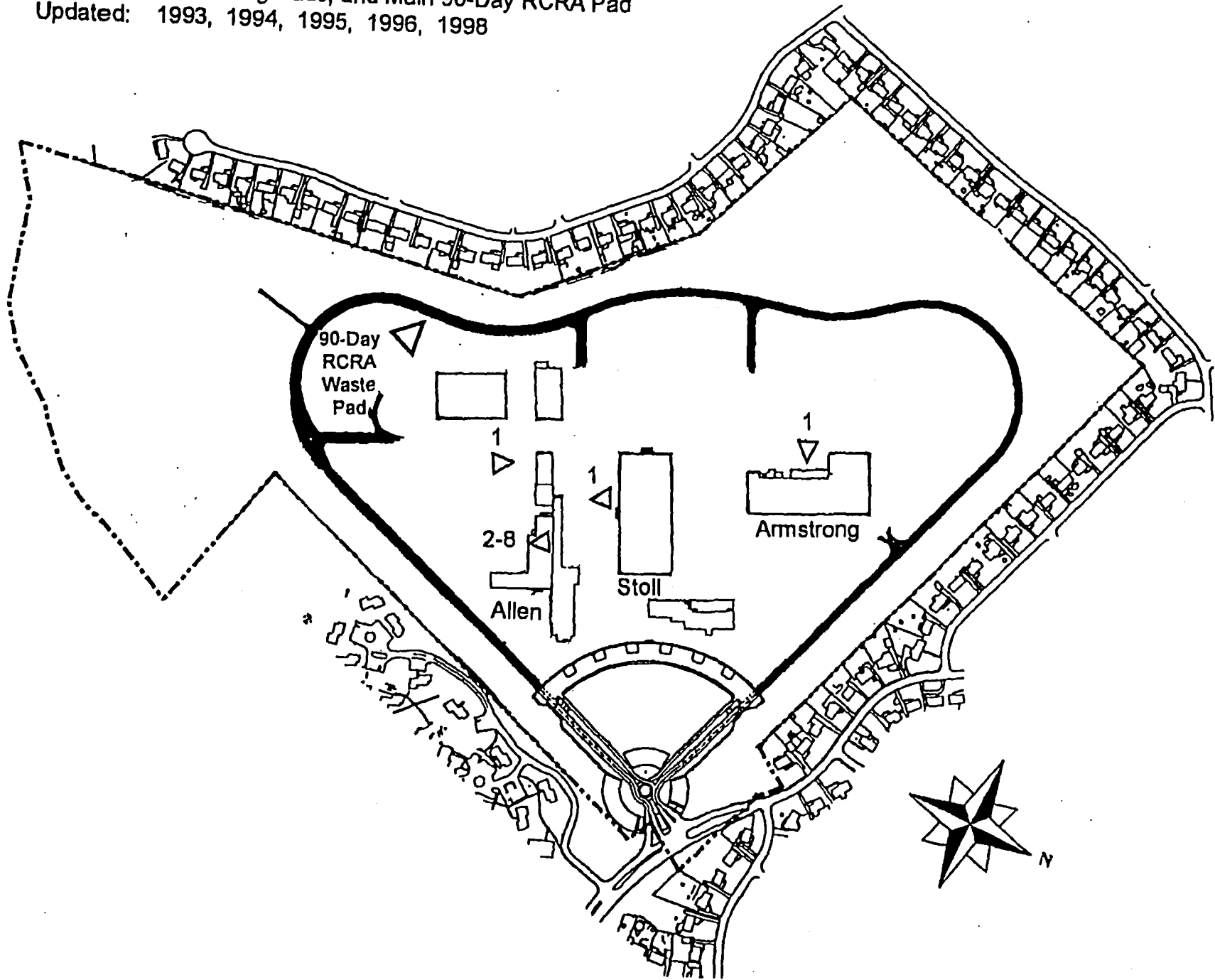

Inspector

11-12-98
(Date)

(CERTIFIED MAIL)
Facility Contact

(Date)

Satellite Pads, Holding Pads, and Main 90-Day RCRA Pad
Updated: 1993, 1994, 1995, 1996, 1998



DRAFT

Dreyfus Research/Business Park Emergency Site Services Team

August 1998

On-Scene Incident Commanders

Primary: Tom Hardesty - Staff Safety Engineer

Back-ups: Steve Olp - Site Services Manager

PEM Carter - Sr. Environmental Engineer

Safety Officials

Primary: PEM Carter - Sr. Environmental Engineer

Tom Hardesty - Staff Safety Engineer

Bernard Jefferson-- Sr. EH&S Tech

Emergency Site Services Team (ESST) Members

Steve Olp

Tom Hardesty

PEM Carter-40 hr. HAZWOPER

Bernard Jefferson - EMT and 40 hr. HAZWOPER

Joe Ramsey

Dan Wolfe

Steve Livengood

Roger James - BECON

Jim Linenberger - 1st aid/CPR BECON

<p>Following individuals have received 40 hr. HAZWOPER Training: Richard Brown - Utilities BECON John Barwick - Utilities BECON Jimmy Meisemer - Utilities BECON R.J. Miller - Utilites BECON George Camp - Utilities BECON Ron Ballard - Utilities BECON Jeffrey Williams - Utilities BECON John Rohlfig - Electrician BECON</p>	<p>Following individuals have received 8 hr. HAZWOPER training: Kevin Simpson - Utilities BECON Robert Cameron- Mechanic BECON</p>	<p>Following individuals have received First Aid/CPR training: Karl Hilgemann - Utilities BECON Proctor Roddey - WHSE BECON Terry Spooner - Maintenance BECON James Jacobs - Electrician BECON</p>
--	--	---

Official Spokespersons

Beth Calhoun

Steve Olp

Tom Hardesty

State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
Hazardous Waste Section

SITE SAFETY PLAN (SSP) UPDATE FORM
(Regulated Facility)

(A) Facility Name: CELANESE ACETATE LLC EPA ID# NCD 000 608 117

Address: 2300 ARCHDALE DRIVE, CHARLOTTE, NC 28210 Phone# 704-554-3020

Contact: PEM CARTER - ENV. ENGINEER Phone# SAME

Facility Safety Designee: _____

HWSS Staff: JOSEPH S. PARKER - WMS Date: 11-9-98

(B) REVIEW AND CHANGES

SSP Reviewed: SSP Changed: (1) SSP Unchanged: _____

Comments: COMPLIANCE EVALUATION INSPECTION CONDUCTED

(1) NOTE: Any changes made in the facility process descriptions or health and safety considerations section of the SSP must be shown on a new SSP.

(C) EMERGENCY INFORMATION

Ambulance: _____ Telephone# 911

Hospital: Presbyterian, Mincy, CAROLINAS Med. Telephone# 391-4000, 399-5006 (911)

Police: CHARLOTTE City Police Telephone# 911

Fire Dept.: STATION 6 - CHA/MECK. Telephone# 911

Fire & Emergency Signals Reviewed:

Site Evacuation Plan Reviewed:

SAFETY OFFICER: _____ DATE: _____

RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: CELANESE ACETATE LLC
Location: 2300 ARCHDALE DRIVE, CHARLOTTE, NC 28210
Mailing Address: P.O. BOX 32414, CHARLOTTE, NC 28232
EPA ID#: NC000608117 Phone Number: 704-554-3020
Contact/Title: PEM CARTER - ENV. ENGINEER
Inspection Date: NOV. 10, 1998 Last Inspection: NOV. 28, 1995
Status: LQG Type of Inspection: CEI
Inspector(s): JOSEPH S. PARKER - WASTE MGMT. SPECIALIST
Present at Inspection: PEM CARTER - ENV. ENGINEER
Type of Business: OPERATES AS AN R+D FACILITY
Wastes Generated: FOO3 - WASTE FLAM. LIQUIDS 1 (Acetone, Sulphuric Acid) 2 (Acetone, colliglose, Acetate) 3 (Methanol, acetone), WASTE FLAM. Solids organic (Acetone)

Manifests: Approved Transporters? Approved TSDF?
Filled Out Correctly? Signed Copies?
LDR Notification Attached?

1998 HAZARDOUS WASTE MANIFESTS WERE IN GOOD ORDER. FACILITY HAS A VERY GOOD TRACKING SYSTEM FOR H.W. MANIFESTS.

Waste Minimization: Reduce all materials for cost and quantity and disposal methods, Cut down on usage and try to use efficiently, Recycling of batteries, Pl. BULKs, paper items.

Inspection Records:
Evidence that inspections are conducted: Yes, documented
Inspections on Storage Area: Yes, weekly
Inspections on H.W. Tanks: N/A
Inspections on Ancillary Equipment: N/A

Contingency Plan:
On-Site? Yes
Any changes to facility/processes or Emergency Coordinator since last review? FACILITY PERSONNEL CHANGES IN EMERGENCY RESPONSE POSITIONS CURRENTLY BEING AWARDED.

Contingency Plan Implemented? NO (If yes, was it adequate?)

Agreements with Emergency Responders? Yes, documented via Cert. Mail

Training Records:
Certified Training Documents Available? Yes, Documented training
New Employees Since Last Inspection? Yes, Bryan Fincher
Evidence of Improper/Inadequate Training? no
Bernard Jeffuson, Bryan Fincher, PEM CARTER - 7-15-98, 4-2-1998, 4-7-98

Employee Interviews:
Name(s): _____ Trained? _____

Annual Report Submitted? Yes

TRANS
Advanced ENVR TECH SVCS (AETS) NCD 080 631 369
1996 LANDLAW ENVIRONMENTAL SERV - SCD 987 574 647
TSD
Advanced Environmental Technical Serv. NCD 986 166 338
1996 LANDLAW ENV. SERVICES NCD 000 648 451

Page Two - RCRA Inspection Report

Facility Name: CELANISE Acetate LLC
EPA ID#: NCD 000 608 117
Inspection Date: NOV. 10, 1998

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? Release observed on 1-55 gal container in Machine mix area and 1-55 gal in the Drum Clean Area. Recommendation
Internal Communications or Alarm Present? Facility FIRE Alarm for all Buildings, PA system for specific Bldg. Walk talkies, PAGER, cell phones
Portable Fire Extinguishers and/or Fire Control Equipment? Fire Equip such as fire ext. + Moxos throughout site
Spill Control Equipment: OVERPACK drums, Spadee Dry, PPE, Abs. Pads

Adequate Water Volume, Foam Equipment or Auto Sprinklers? CO₂, FOAM, ABC, WATER sprinkler

All Equipment/Alarms Tested and Maintained? Alarm - constant test, Equipment checked by Contractor Fire & Safety

All Personnel Handling HW have Access to Alarm/Device? Shut down Alarm and emergency number on telephone

Adequate Aisle Space in Areas of Facility Operation? YES

Satellite Accumulation Area(s): 9

Location(s): (see Attached LIST) 500. amt.

mach. mix area Floor 2, Room 2004 - observed release from spillage on outside of Drum.

Floor 2, Room 2005 - Empty container destined to hold haz. waste not labeled, not closed - NO violation, but be aware of possibility. Contact labeled & closed container facility

Satellite Containers: Closed?

Labeled/Contents Identified?

< 55 Gallons?

Releases? Recommendation on both areas

Storage Area(s):

Description(s): 7-55 gallon containers in storage (in compliance)

Containers: Closed? Aisle Space? Labeled?

Dated? Evidence of Release? NO

< 90 Days? Good Condition?

Other HW Units: (Applicable Regulations)

Description of Unit: N/A

External Facility Condition: _____

Page Three - RCRA Inspection Report

Facility Name: CELANESE ACETATE LLC

EPA ID#: NCD 000 608 117

Inspection Date: NOV. 10, 1998

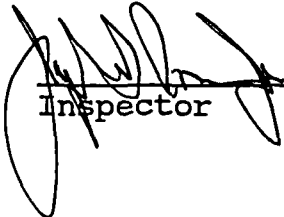
Site Deficiencies: NONE

Recommendations:

1) Facility needs to remind employees in the Machine Mix Area and Drum Clean Area on releases of HAZ WASTE on sides of containers due to sloppy work habits. Employees should be reminded of company policy on waste handling. Recommendation has been document for future compliance inspections.

2) Drum Clean Area - Some releases of material were not distinguishable between product and waste. These operations may need to be separated to see how AND where releases are occurring

3) Once employees have been presented with the results of this inspection, the facility should send the inspector a copy of the items discussed & what actions are being taken to correct situations.

 11-10-98
Inspector (Date)

 11-10-98
Facility Contact (Date)

Follow Up Inspection:

Comments: _____

Inspector (Date)

Facility Contact (Date)

002 - WASTE TOXIC LIQ. CORROS. ORGANIC (O-chlorophenol)

003 - WASTE TOXIC, LIQUIDS, ORGANIC (Methylene Chloride)

U090 - WASTE TOXIC SOLIDS (Meth. Cyanide)

009 - WASTE MERCURY

002 - WASTE CAUSTIC ALKALI LIQUIDS (Sodium Hydroxide)

FLAM. LIGHT BULBS - RECYCLED

001 - WASTE FLAM. LIQUIDS (NICOTINE) TOXIC

003 - WASTE FLAM LIQUID. (PYRIDINE)

U21 - WASTE TOXIC (CARBON TETRA., PHENOL)

WASTE BATTERIES (ACID LITHIUM)

HAZ WASTE LIQUID (112 Trichloro, 122 Trifluoromethane)

OTHER VARIOUS LAB CHEMICALS USED IN THE R+D OPERATIONS

ATTACHMENT II

Hazardous Waste Satellite and 90-DAY RCRA Storage

The following lists the areas associated with the inspection form.

Armstrong
NON-HAZ: Outside Satellite: "C" Finish Oils, "H" Machine Oils, Universal Waste/Batteries

Stoll
NON-HAZ: Outside Satellite: "C" Finish Oils, "H" Machine Oils, Universal Waste/Batteries

Allen

1	Cellulose Pilot Plant Floor 1, Room 109, Machine Filtration Room	} 3-55 gal Acetone/Acetone Pipe Waste 2 HV Press Dressing 3 Acetone/cellulose Acetate
2	Cellulose Pilot Plant Floor 1, Room 109, Machine Press Area	
3	Cellulose Pilot Plant Floor 1, Room 109B, Machine Mini-Header	
4	Cellulose Pilot Plant Floor 2, Room 2004, Machine Mix Area	- 1-55 gal D001/F003 Acetone Release
5	Cellulose Pilot Plant Floor 2, Room 2005, Machine Craft Lab	- 1-55 gal D001/F003 - Fixed Label Tighten down Pipe
6	Cellulose Pilot Plant Floor 3, Room 3002, Machine Split-flow	- 1-55 gal D001 Acetone (In Compliance)
7	Cellulose Pilot Plant Floor 3, Room 3002, Machine Multi-Purpose	- 1-55 gal D001 Acetone
8	Cellulose Pilot Plant Floor 3, Room 3002, Machine T-Metterer	- 1-55 gal D001 Acetone
9	CA Drum Clean Area	- 1-55 gal Solubility Dept Material D001/F003 - Evidence of releases (Recomm.)

NON-HAZ: Outside Satellite: "C" Finish Oils, "H" Machine Oils, Universal Waste/Batteries

Behind Warehouse
90-Day Main RCRA Storage for all Hazardous and Non-Hazardous Waste

STATE OF NORTH CAROLINA
Department of Environment, Health,
and Natural Resources
 919 North Main St.
 Mooresville, N.C. 28115
 (704)663-1699/ FAX 663-6040

Hazardous Waste Section File Access Record

Time/ Date 5/16/96 10:00 AM
 Name DOUGLAS OLSON
 Representing VI ENVIRONMENTAL INC. - BETHESDA, MD

Guidelines for Access:

The staff of the Mooresville Regional Office is dedicated to making public records, in our custody, readily available to the public for review and copying. We also have the responsibility to the public, to safeguard these records, and to carry out our day-to-day program obligations. Please read carefully, the following guidelines before signing this form:

1. We prefer that you call at least a day in advance to schedule an appointment to review the files. Appointments will be scheduled between 9:00 am and 4:00 pm. Viewing time ends at 5:00 pm. Anyone arriving without an appointment may view the files to the extent that time and staff supervision is available.
2. You must specify the files you want to review by facility names. The number of files that you may review at one time will be limited to five (5).
3. You may make copies of a file when the copier is not in use by the staff, and if time permits. Access to the copy machine may be limited after 2:00 pm, due to heavy staff use. Cost per copy is ten (10) cents; payment may be made by check, money order, or cash at the reception desk. Checks should be made payable to the Dept. of Environment, Health, and Natural Resources, or DEHNR.
4. **FILES MUST BE KEPT IN THE ORDER YOU FOUND THEM.** Files may not be taken from the State office. To remove, alter, deface, mutilate, or destroy material in one of these files is a misdemeanor for which you can be fined up to \$ 500.00.

	<u>Facility Name</u>	<u>County</u>
1.	<u>COLMASE CORP</u>	<u>Mecklenburg</u>
2.		
3.		
4.		
5.		

[Signature] -101 5/16/96 10:00 AM - 11:00 AM
 Signature & Name of Firm/ Business Date Time In/ Time Out

(Please Attach a Business Card to This Form)

Submitted by: _____ Date: _____

Entered by: _____ Date: _____

ZPA ID: **NCID00006081117**

Facility Name: **Celanese-Dreyfus**

City: **Charlotte, N.C. 28232**

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: **S** Date: **Mo** / **Day** / **Year**

Type: **CEI**

Control Number Data Entry Personnel

Person: **010** BRANCH **01** REASON

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D: Del.)

Generators	
GBF	<input type="checkbox"/>
GER	<input type="checkbox"/>
GGR	<input type="checkbox"/>
GLB	<input type="checkbox"/>
GMR	<input type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input type="checkbox"/>
GRR	<input type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters	
TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's	
DBF	<input type="checkbox"/>
DCH	<input type="checkbox"/>
DCL	<input type="checkbox"/>
DCP	<input type="checkbox"/>
DFR	<input type="checkbox"/>
DGR	<input type="checkbox"/>
DGH	<input type="checkbox"/>
DIN	<input type="checkbox"/>

DLB	<input type="checkbox"/>
DLF	<input type="checkbox"/>
DLT	<input type="checkbox"/>
DMC	<input type="checkbox"/>
DOR	<input type="checkbox"/>
DOT	<input type="checkbox"/>

DPB	<input type="checkbox"/>
DPP	<input type="checkbox"/>
DSI	<input type="checkbox"/>
DTR	<input type="checkbox"/>
DTT	<input type="checkbox"/>
DWP	<input type="checkbox"/>

USED OIL	
TUO	<input type="checkbox"/>
TFO	<input type="checkbox"/>
BUO	<input type="checkbox"/>
MUO	<input type="checkbox"/>
PUO	<input type="checkbox"/>
RUO	<input type="checkbox"/>

COMPLIANCE SCHEDULE (TSD, GEN, TRANS.)

FEA CAS

Evaluation Comments: (72) 1 :

2 : No violations noted

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (ndy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (ndy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (ndy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data if necessary -

RCRA INSPECTION REPORT

(x= violation, na= not applicable)

General Information:

Facility Name Celanese - Dreyfus
Location 2300 Archdale Dr. Charlotte, N.C. 28232
Mailing Address P.O. Bx 32414 Charlotte, N.C. 28232
EPA I.D.# NCD 000 608 117 Phone # (704) 554-3510
Contact/ Title Mrs. PEM Carter
Inspection Date 28 November 1995 Last Inspection 18 July 1994
Status Large Quantity Generator Type of Inspection CEI
Waste Management Specialist(s) Mr. Robin B. Hedden
Present at Inspection Mr. PEM CoAer
Type of Business Research & Development
Waste Generated _____

Manifests:

Approved Transporters? Yes Approved TSD's? Yes
Signed Copies? Yes Filled Out Correctly? Yes
LDR Notification Attached? Yes

Waste Minimization? Yes How? Writter Plan; recycling, recover metals, recycle solvents, reduction in use, recycle instead of landfilling, source reduction, and solid waste recycling

Hazardous Waste Inspection Records:

Inspections On Storage Area Yes
Inspections On H.W. Tanks N/A
Inspection On Ancillary Equipment N/A

Contingency Plan:

On Site? Yes
Any changes to facility/ processes or Emergency Coordinators since last review? 10 Oct 95
Contingency Plan used? Yes (if yes, was it adequate?) 27 MAR 95, worked well
Agreements with Emergency Responders? Yes

Training Records:

Certified Training Documents Available? Yes
Any New Employees Since Last Review? Yes
Evidence Of Improper/ Inadequate Training? No, Celanese has people that leave the country for months. Those people are trained when they come back to the U.S. Allow for the time because they can not be trained in another continent.

Facility Name Celinese - Dreyfus EPA I.D.# NCD 000 608 117
Inspection Date 28 Nov 95

Employee Interview:

Names(s) _____ Trained _____

Annual Report Submitted? Yes Copy At Facility? Yes

Emergency Preparedness:

Facility Maintained And Operated To Prevent Releases? Yes

Internal Communications Or Alarm Present? Yes

Device In Area Of Operation To Summon Outside Help? Yes

Portable Fire Extinguishers And/ Or Fire Control Equipment? Yes

Spill Control Equipment? Yes

Adequate Water Volume, Foam, Equipment, Or Auto Sprinkler? Yes

All Equipment/ Alarms Tested And Maintained? Quarterly

All Personnel Handling H.W. Have Access To Alarm/ Device? Yes

Aisle Space In Area Of Facility Operations? Yes

Satellite Accumulation Area(s) 7 Location(s) See Storage Area

7) Ethanol (cellulose storage bld (3 drums))

Containers: Closed? Labeled? <55 gal. Stored <3 days if full? NA

Storage Area(s): 2 Description 1) Ammonia sat. Pad, 2) OR Personnel, 3) Still Bld, 4) 3 drums Cellulose Pilot Plant

5) Drum Wash Area, 6) Cellulose Storage Area
Flourescent lights on pad

Containers: Closed? Aisle space? Labeled? Releases? No, No

Dated? Yes, NA <90 days? Yes, NA Good condition? Yes, NA

Other H.W. Units: (Applicable Regulations)

Description of Unit None

External Facility Condition Good

Facility Name Celanese - Drayfus
Inspection Date 28 Nov 95

EPA I.D.# NCD 000 608 117

Site Deficiencies: None

- 1.) 40 CFR _____
- 2.) 40 CFR _____
- 3.) 40 CFR _____
- 4.) 40 CFR _____
- 5.) 40 CFR _____
- 6.) 40 CFR _____

Recommendations/ Violations Continued: None, outstanding documents & waste management.

John B. Holden 28 Nov 95
RCRA Inspector (date)

Tom Carter 28 Nov 95
Facility Contact (date)

Follow Up Inspection:

Comments _____

RCRA Inspector (date)

Facility Contact (date)

Region IV CM&E Form - Side A

EPA ID: NCD000608117

DATA ENTRY PERSONNEL
Submitted by: _____ Date: _____
Entered by: _____ Date: _____

Facility Name: Hoechst Celanese City: Charlotte, N.C.

EVALUATION DATA: New: _____ Change: _____ Delete: _____ (: Required)

Agency: S Date: Mo 07 / Day 18 / Year 94 Type: CEI
Control Number Data Entry Personnel: _____
Person: 0110 BRANCH 011 REASON

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators	
GBF	
GER	E
GGR	E
GLB	E
GMR	E
GOR	
GPT	E
GRR	E
GSC	
GSO	

Transporters	
TGR	
TMR	
TOR	
TAR	
TND	

USED OIL	
TUO	
TFO	
BUO	
MUO	
PUO	
RUO	

TSD's		
DBF		
DCH		
DCL		
DCP		
DGR		
DGS		
DGH		
DIN		
DLB		
DLF		
DLT		
DHC		
DMR		
DOR		
DOT		
DPB		
DPP		
DSI		
DIR		
DTT		
DWP		

COMPLIANCE SCHEDULE (TSD, GEN, TRANS.)
FEA CAS

Evaluation Comments: (72) 1: _____

2: No violations noted

VIOLATION DATA: New: _____ Change: _____ Delete: _____

Agency: Type: Date (ndy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: Scheduled Actual
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Agency: Type: Date (ndy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: Scheduled Actual
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Agency: Type: Date (ndy) Determined: / / Class:
 Priority: Branch: Person: Seq. Number (Data Entry)
 Return to Compliance: Scheduled Actual
 Reg. Type: Reg. Description (30): _____
 Comment (72): _____

Continue violation data if necessary -

RCRA INSPECTION REPORT

X=violation noted; NA=not applicable

Facility Name: Hoechst Celanese
Location: 2300 Archdale Dr. Charlotte, N.C. 28232
Mailing Address: P.O. Bx 32414 Charlotte, N.C. 28232
ID#: NCD 000 608 117 Phone Number: (704) 554-3510
Contact/Title: Pam Carter
Inspection Date: 18 July 94 Last Inspection: 28 June 94
Status: Large Quantity Generator Type of Inspection: CEI
Inspector(s): Robin B. Hedden - WMS
Present at Inspection: _____
Type of Business: Research & Development
Waste Generated: you name it!!! F-series, D-series, U-series
(LAB PAGES FOR THE MOST PART)

Manifests:

Approved Transporters? yes Approved TSD's? yes
Signed Copies? yes Filled Out Correctly? yes
LDR Notification Attached? yes
Rollins Chempack, Inc + Laidlaw are taking longer than 10 days to get material to TSD. (40 CFR 263)

Waste Minimization? Reduce solvent activities, do not wash out drums. Reduce sample quantities. PLAN IN WRITTEN FORM.

Inspection Records: OK

Evidence That Inspections Are Conducted: yes

Contingency Plan: OK

On Site? yes
Any Changes To Facility/Processes Or Emergency Coordinator Since Last Review? 14 Apr 94
Contingency Plan used? No (if yes, was it adequate?) NA

Training Records:

Certified Training Documents Available? yes
Any New Employees Since Last Review? yes
Evidence Of Improper/Inadequate Training? No

Facility Name: Hoedchst Celanese
ID #: NCD 000 608117 Inspection Date: 18 July 94

Employee interviews:
Name(s): _____ Trained? _____

Annual Report Submitted? yes

Emergency Preparedness:
Facility Maintained And Operated To Prevent Releases? OK
Internal Communications Or Alarm Present? OK
Device In Area Of Operation To Summon Outside Aid? yes, pull alarm
Portable Fire Extinguishers And/Or Fire Control Equipment? OK
Spill Control Equipment? OK
Adequate Water Volume, Foam, Equipment, Or Auto Sprinklers? OK
All Equipment/Alarms Tested And Maintained? OK
All Personnel Handling HW Have Access To Alarm/Device? OK
Aisle Space In Areas Of Facility Operations? OK
Agreements With Emergency Responders? yes

Satellite Accumulation Area(s): OK Location(s): OK

Containers: Closed? ✓
Labeled? ✓
< 55 gallons? ✓

Storage Areas: Description: OK

Containers: Closed? ✓ Aisle Space? ✓
Labeled? ✓ Evidence Of Release? ✓
Dated? ✓ < 90 Days? ✓
Good Condition? ✓

Other HW Units: (Applicable Regulations)
Description Of Unit: _____

External Facility Condition: _____

Facility Name: Hoechst Celanese
ID #: NCD 000 1608 117 Inspection Date: 18 July 94

Site Deficiencies: No violations noted

- 1).40 CFR _____
- 2).40 CFR _____
- 3).40 CFR _____
- 4).40 CFR _____
- 5).40 CFR _____
- 6).40 CFR _____
- 7).40 CFR _____

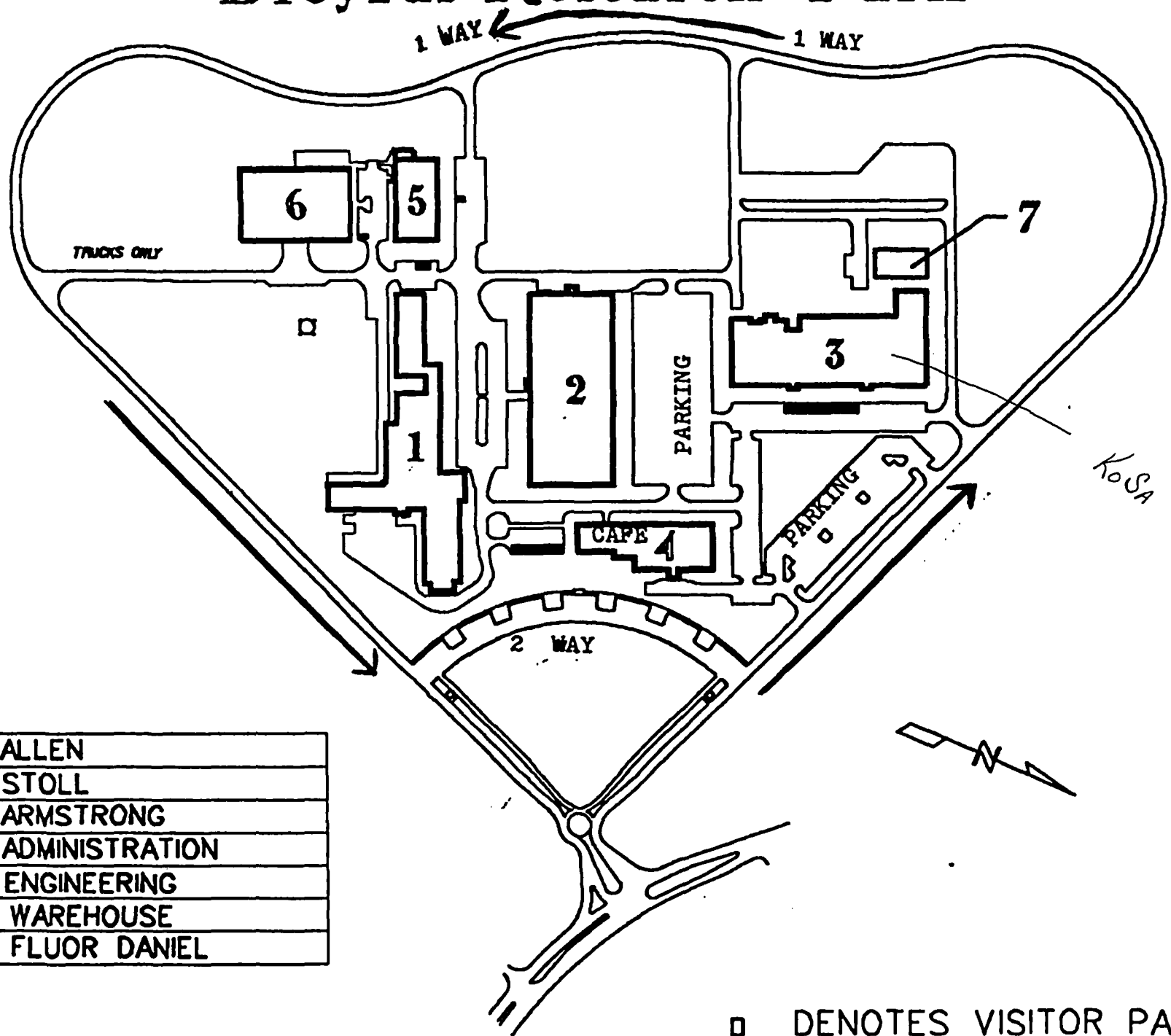
18 July 1994

Robin B. Hall

CONTACT:

Tom Carter 7-18-94

Dreyfus Research Park



1	ALLEN
2	STOLL
3	ARMSTRONG
4	ADMINISTRATION
5	ENGINEERING
6	WAREHOUSE
7	FLUOR DANIEL

□ DENOTES VISITOR PARKING

RCRA INSPECTION FIELD NOTES- GENERATOR

C = copies made; * = violation; P = photo taken

Facility Name: Hoechst Celanese
Address: 2300 Archdale drive Charlotte, N.C. 28232
ID #: NCD 000 608 117
Inspection Date: 18 July 94 Last Inspection 28 June 93
Contact: Pem Carter Type of Inspection CEI
Present at Inspection: _____

Type of business: R&D Facility
Processes: _____
Wastes Generated: _____

Transporters: C.I. Whitten Transp. Co. (WV) 60348006 TSD's Adv. Env. (NCD 95) 118

Manifests: OK
Signed Copies? ✓ Filled out correctly? ✓
Treatment Standards? ✓

Inspection Records: OK

Contingency Plan:
Actions for spills/fires? OK Agreements with emergency contacts? OK
Em. coords updated? OK Name, address, phone for em. coords? OK
Emerg equip/location/alarms? OK Report on use of conting. plan? OK
Evacuation plan/signals/primary/secondary? OK

Training Records:
Last training? OK Em coord.s and appropriate people trained? OK
Job Title? OK Job description? OK
Content? OK Sign off? OK

Annual Report: OK
Waste analysis (TCLP): OK
Accumulation Areas: Description: _____

~~Closed/labeled/dated/< 55 gallons?~~
Storage Areas: Description: OK

~~Closed/labeled/dated/< 90 days/good condition?~~

Violations are:
Class II _____ (NOV)
Class I _____ (FILL OUT COMPLIANCE ORDER FORM).

EPA ID: NC0000608117

Submitted by: _____ Date: _____
Entered by: _____ Date: _____

Facility Name: Hoechst Celanese City: Charlotte

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: S Date: 06/28/93 Type: CFE Control Number Data Entry Personnel

Person: 027 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators	
GER	<input checked="" type="checkbox"/>
GGR	<input checked="" type="checkbox"/>
GLB	<input checked="" type="checkbox"/>
GSQ	<input type="checkbox"/>
GMR	<input checked="" type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input checked="" type="checkbox"/>
GRR	<input checked="" type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters	
TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's		
DCH	<input type="checkbox"/>	<input type="checkbox"/>
DCL	<input type="checkbox"/>	<input type="checkbox"/>
DCP	<input type="checkbox"/>	<input type="checkbox"/>
DFR	<input type="checkbox"/>	<input type="checkbox"/>
DGS	<input type="checkbox"/>	<input type="checkbox"/>
DGW	<input type="checkbox"/>	<input type="checkbox"/>
DIN	<input type="checkbox"/>	<input type="checkbox"/>
DLB	<input type="checkbox"/>	<input type="checkbox"/>
DLF	<input type="checkbox"/>	<input type="checkbox"/>
DLT	<input type="checkbox"/>	<input type="checkbox"/>
DMC	<input type="checkbox"/>	<input type="checkbox"/>
DMR	<input type="checkbox"/>	<input type="checkbox"/>
DOR	<input type="checkbox"/>	<input type="checkbox"/>
DOT	<input type="checkbox"/>	<input type="checkbox"/>
DPB	<input type="checkbox"/>	<input type="checkbox"/>
DPP	<input type="checkbox"/>	<input type="checkbox"/>
DSI	<input type="checkbox"/>	<input type="checkbox"/>
DTR	<input type="checkbox"/>	<input type="checkbox"/>
DTT	<input type="checkbox"/>	<input type="checkbox"/>
DWP	<input type="checkbox"/>	<input type="checkbox"/>

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:

(72) 1: Unscheduled inspection - no violations noted
2: _____

VIOLATION DATA: New: _____ Change: _____ Delete: _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: Scheduled Actual

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

To: Hoechst Celanese
Address: 2300 Archdale Drive
Charlotte, N.C.
EPA ID# NC000608117

Docket # 92-409
Inspection Date: Aug. 26 / Sept. 3, 1992
Facility Type: Generator

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On August 26 & Sept. 3, 1992, Jesse W. Wells representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Specifics

- 262.34(a)(4) ref 265.16(c) Annual review of training not documented for emergency coordinators
- ref 265.54(d) Contingency plan was not immediately amended to reflect change in the emergency coordinator list
- _____
- _____
- _____
- _____

You are hereby required to comply with the noted violation(s) by October 3, 1992, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A - 22(a) and 15A NCAC 13B .0701-.0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

September 3, 1992
(Date)

Jesse W. Wells
N.C. Hazardous Waste Section

I, Jesse W. Wells, hereby certify that I have personally served a copy of this Notice on Ms PEM Carter at Hoechst Celanese on September 3, 19 92

PEM Carter
(Recipient Signature)

cc: field files
central files
Regional Office

Facility Name: Asecht Colmanic
ID #: NID030605117

6) Waste Minimization:

- 1) Better Training and Handling procedures
- 2) Try to prevent waste streams by analyzing all products before bought.

7) Site Deficiencies:

None Noted

8) Recommendations:

Signed:

Philip D. Day
Inspector/Reviewer

Tom Carter
Facility Contact

6/28/93
Date

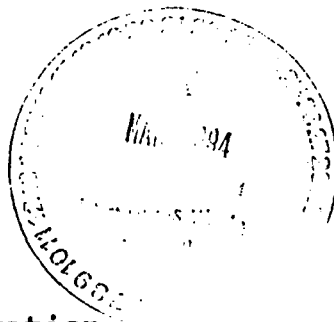
Hoechst Celanese

Hoechst Celanese Corporation
13800 South Lakes Drive
Charlotte, NC 28273
704 588-5310
Fax 704 588 5319
Telex 9102502974

CERTIFIED MAIL

March 17, 1994

State Director
NC Department of Environmental,
Health and Natural Resources
Division of Solid Waste Management
Hazardous Waste Section
P. O. Box 27687
Raleigh, NC 27611-7687



Subject: Treatability Studies Notification

Dear Sir/Madam:

In accordance with the North Carolina Hazardous Waste Management Rules and Solid Waste Management Law, Rule .0006, Section 261.4, Paragraph (f), entitled Samples Undergoing Treatability Studies at Laboratories and Testing Facilities, we are hereby notifying you (State Director) in writing that we are intending to conduct treatability studies under this paragraph.

Our EPA ID number is NCD981861396.

Gladys Abernathy (704-587-8545) will be the Hoechst Celanese site contact for these studies.

If you have any questions or require more information, please contact either Ms. Abernathy or myself at (704-587-8450).

Yours truly,

A handwritten signature in cursive script that reads "Thomas W. Scott".

Thomas W. Scott, P.E., C.I.H.
EHS Group Leader

file: TWS-32-94
Treatability Studies

cc: G. P. Abernathy
J. Gettliffe
J. W. Evans

CERTIFIED MAIL: RETURN RECEIPT
TO PEM Carter

June 10, 1993

PEMC93:47

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

Hazardous Waste Section
Solid Waste Management Division
Department of Environment, Health and Natural Resources
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Attention: Mr. Jerry Rhodes

Dear Sir:

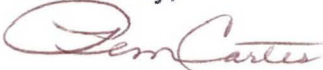
I request for Hoechst Celanese - Dreyfus Research Park at 2300 Archdale Drive, Charlotte, NC (NCD000608117) an extension of the 90-day limit for storage of hazardous waste by a generator without a permit. Eight (8) full 55-gallon drums consisting of Acetone (70% - 75%), Cellulose Acetate Flake (20% - 25%) and Methanol (01% - 05%) will be reaching the end of their storage time on the following days:

Two (2) drums	on June 13, 1993
Two (2) drums	on June 14, 1993
Two (2) drums	on June 15, 1993
One (1) drum	on June 19, 1993
One (1) drum	on June 20, 1993

I assure you that all eight drums will be shipped on June 22, 1993, using Advanced Environmental Technology Corporation (AETC) for transportation. At that time I shall notify this office of the shipment of this waste by sending a copy of the manifest signed by myself and the transporter. This material will be shipped to our Cellulose Acetate operation.

Thank you for your consideration.

Sincerely,



PEM Carter
Environmental Engineer

cc: R. E. Caldwell - 466

Phillip Delp NCDEHNR, 919 N. Main Street, Mooresville, NC 28115



State of North Carolina
Department of Environment, Health, and Natural Resources
512 North Salisbury Street • Raleigh, North Carolina 27604
Division of Solid Waste Management

James B. Hunt, Jr., Governor

Telephone 919-733-2178

Jonathan B. Howes, Secretary

June 21, 1993

Pem Carter
Environmental Engineer
Hoechst Celanese Corporation
PO Box 32414
Charlotte, NC 28232-6085

Re: Extension of Accumulation Time

Dear Pem Carter:

On June 16, 1993, this Agency received your request for an extension of the 90-day limit for storage of hazardous waste by a generator without a permit. This request is for NCD000608117.

In order to allow sufficient time for eight drums to be shipped by AETC to your Cellulose Acetate operation, a 30-day extension is hereby granted from June 13, 1993 to July 13, 1993. This is the maximum time allowed under 40 CFR 262.34(b) as adopted in 15A NCAC 13A .0007.

By July 23, 1993, you shall notify this office of the shipment of this waste by sending us a copy of the manifest signed by yourself and the transporter.

Sincerely,

A handwritten signature in cursive script that reads "Jerome H. Rhodes".

Jerome H. Rhodes, Chief
Hazardous Waste Section

JHR/MSB/pcs

cc: Phillip Delp
Keith Masters

EPA ID: NC000060R117

Submitted by: _____ Date: _____
Entered by: _____ Date: _____

Facility Name: Hoechst Celanese City: Charlotte

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: S Date: 06/28/93 Type: CSE Control Number Data Entry Personnel: _____
Person: 027 Reason: *to a Land Ban Inspection*

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators

GER	<input type="checkbox"/>
GGR	<input type="checkbox"/>
GLB	<input checked="" type="checkbox"/>
GSQ	<input type="checkbox"/>
GMR	<input type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input type="checkbox"/>
GRR	<input type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters

TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's

DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
DIN	<input type="checkbox"/>	DOT	<input type="checkbox"/>		

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:
(72) 1: Facility is in compliance with Docket # 93-279
2: _____

VIOLATION DATA: New: Change: Delete:

1 Agency: S Type: GLB Date (mdy) Determined: 05/21/93 Class: 2
Priority: Branch: 01 Person: 027 Seq. Number (Data Entry): _____
Return to Compliance: 06/19/93 Scheduled 06/28/93 Actual
Reg. Type: SR Reg. Description (30): 268.7(a)(1)
Comment (72): Facility is in compliance with violation

_____ Agency: Type: Date (mdy) Determined: /____/____ Class:
Priority: Branch: Person: Seq. Number (Data Entry): _____
Return to Compliance: /____/____ Scheduled /____/____ Actual
Reg. Type: Reg. Description (30): _____
Comment (72): _____

_____ Agency: Type: Date (mdy) Determined: /____/____ Class:
Priority: Branch: Person: Seq. Number (Data Entry): _____
Return to Compliance: /____/____ Scheduled /____/____ Actual
Reg. Type: Reg. Description (30): _____
Comment (72): _____

Continue violation data on Side B if necessary -

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

To: Hochst Celanese
Address: 2300 Archdale Drive
Charlotte, N.C.
EPA ID# NCD 000 608 117

Docket # 92-409
Inspection Date: Aug. 26/Sept. 3, 1992
Facility Type: Generator

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On August 26 & Sept. 3, 1992, Jesse W. Wells representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Specifics

262.34(a)(4) ref 265.16(c) Annual review of training not documented for emergency coordinators
ref 265.54(d) Contingency plan was not immediately amended to reflect
change in the emergency coordinator list

You are hereby required to comply with the noted violation(s) by October 3, 1992, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A - 22(a) and 15A NCAC 13B .0701-.0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

September 3, 1992
(Date)

Jesse W. Wells
N.C. Hazardous Waste Section

I, Jesse W. Wells, hereby certify that I have personally served a copy of this Notice on Tom PEM Carter at Hochst Celanese on September 3, 19 92
Tom Carter
(Recipient Signature)

cc: field files
central files
Regional Office

RCRA INSPECTION REPORT

1) Facility Name:

ID Number: NCD000608117

Type of facility: LQG

Ownership: Hoechst Celanese

Contact: Ms. P.E.M. Carter

Phone number: (704) 554-3510

Facility location (address): 2300 Archdale Drive

City, state, zip: Charlotte, N.C. 28212

2) Survey Participants:

Mr. Phillip Oehl

Ms. P.E.M. Carter

3) Date of Inspection:

6/28/93

4) Purpose of Inspection:

To determine compliance with NSR

5) Facility Description:

Docket # 93-277

Processes:

No change from last inspection.

Type Waste: —

Transporters: —

TSD's: —

Accumulation areas: —

Storage areas: —

Facility Name: Hewlett Packard
ID #: NC000603117

6) Waste Minimization:

No change.

7) Site Deficiencies:

1) 268.7(a)(i) - Facility is in compliance with violation.

8) Recommendations:

Signed:

Phillip Ouy

Inspector/Reviewer

Tom Carter

Facility Contact

Date

6/28/93

RCRA INSPECTION REPORT

1) Facility Name:

ID Number: NCD05C605117

Type of facility: LAG

Ownership: Hoechst Celanese

Contact: (704) 554-3510

Phone number: Ms. P.E.M. Carter

Facility location (address): 2300 Archdale Drive

City, state, zip: Charlotte, N.C. 28210

2) Survey Participants:

Mr. Phillip Depp
Ms. P.E.M. Carter

3) Date of Inspection: 6/28/73

4) Purpose of Inspection: Unannounced inspection to determine compliance with 49 CFR 262, 265, and 266

5) Facility Description:

Processes: Hoechst Celanese is a research and development park, operating numerous laboratories throughout the facility.

Type Waste:

- ① Acetone (F007, D001)
- ② Most other waste streams are lab wastes with a wide range of waste codes.

Transporters:

- ① Environmental Transfer (NJ 0991291554)
- ② C.T. Whitten Transfer (WVD0063480005)

TSD's:

- ① Hoechst Celanese (SUD003157925)
- ② Advanced Environmental Technology (NCD 980166333)

Accumulation areas:

15 accumulation areas (15 drums)

Storage areas:

13 drums in storage

RCRA INSPECTION FIELD NOTES- GENERATOR

C = copies made; * = violation; P = photo taken

Facility Name: Hoechst Celanese
Address: 2300 Archdale Drive
ID #: NCD000608117
Inspection Date: 6/28/93
Contact: Ms. P.E.M. Carter
Present at Inspection: Mr. Phillip Polg, Ms. P.E.M. Carter
Type of business: Research and Development
Processes: Laboratory
Wastes Generated: see back

Last Inspection: 8/26/92 > Both days
9/3/92

Transporters: see back TSD's: see back

Manifests:
Signed Copies? OK
Treatment Standards? OK
Filled out correctly? OK

Inspection Records: OK

Contingency Plan:
Actions for spills/fires?
Em. coords updated?
Emerg equip/location/alarms?
Evacuation plan/signals/primary/secondary?
Agreements with emergency contacts?
Name, address, phone for em. coords?
Report on use of conting. plan?

Training Records: Throughout the year
Last training?
Job Title?
Content?
Em coord.s and appropriate people trained?
Job description?
Sign off?

Annual Report: OK
Waste analysis (TCLP): NA
Accumulation Areas: Description: 15 accumulation areas (15) done - OK

Closed/labeled/dated/< 55 gallons?
Storage Areas: Description: 18 done in Storage - OK

Closed/labeled/dated/< 90 days/good condition?

Violations are:
Class II (NOV)
Class I (FILL OUT COMPLIANCE ORDER FORM).

Waste

① Aetone (F003, D001)

most
~~are~~ other others
are lab packs.

Transfers

① Environmental Transfer
(NJD991291584)

② C.I. Whitten Transfer
(WVD063480065)

TSR

- ① Hoechst Camera
(SCD 003159928)
- ② Advanced Environmental
Technology
(NCD986166338)

F003
D001
F009
H005
P002
F002
D005

RCRA INSPECTION REPORT

1) Facility Information:

Hoechst Celanese - Dreyfus Research Park
2300 Archdale Drive
Charlotte, N.C. 28210

NCD 000 608 117

2) Facility Contact:

Ms. P.E.M. Carter

3) Survey Participants:

Ms. P.E.M. Carter
Mr. Jesse Wells

4) Date(s) of Inspection:

August 26, 1992/September 3, 1992

5) Purpose of the Survey: Unannounced facility inspection and records review to determine compliance with 40 CFR 262, 265 & 268.

6) Facility Description: Hoechst Celanese is a research & development park, operating numerous laboratories throughout the facility. The site has three satellite storage areas outside the Armstrong, Stell and Allen building. Hazardous waste accumulating in the Cellulose acetate & CP Auto Close^{areas} are dated & labeled. Only one drum of Hazardous Waste was in storage within the designated < 90 deep storage area. Research is primarily conducted on polyester and cellulosic fibers. A variety of chemicals are used. Primary classification of waste generated are F002-F005, D001, D002. F003 (waste acetone) is manifested to HC's Cel River plant where it is distilled and used as product. This waste stream may be eliminated as HC's begins phasing and consolidating various operations. Each satellite storage area maintained a 55 gallon container for waste flammable materials, waste halogenated materials and the Allen Building had a waste satellite drum for caustics. A total of nine satellite drums were in the process of "being filled" primarily from laboratory operations. Transporters used by the facility since the last inspection included Environmental Transfer Corp. (NJD 991 291 584) and Nappi Trucking (NJD 000 813 477). Designated TSD facilities were HC's Cel River Plt. (SCD 003 159 928), Advanced Env. Tech (NCD 996 166 338) Marisol Inc. (NJD 002 454 544).

7) Waste Minimization

8) Site Deficiencies:

- 1.) 265.16(d)(4) Records that document annual review of training for Hazmat Team Members, Technical/Specialist & Incident Commander & Emerg. Brigade Team were maintained on-site, but could not be reviewed as a result of the files being locked and the person with access ~~not~~ was not available at the time of the inspection. The training documentation is to be faxed to the MRO by Friday August 28, 1992. A copy of the people requiring training was obtained. This deficiency will be amended if the records are made available and the training was conducted within the regulatory time frame. Also include emergency & alternate coordinators.
2. 265.16(c) Facility personnel must take part in an annual review/review of initial training. Specifically, alternate emerg. coordinators Ron Fultz, Rich Summers, G.J. Johnson, John Sattizahn, Ron Bailey. Last documented training occurred on June 7, 1991. 9/3/92 (JW)
3. 265.54(d) - Contingency plan was not amended to reflect changes in emergency coordinator list. (Mike Belder, Retired) 9/5/92 (JW)

9) Recommendations:

1. Evacuation Routes are posted throughout the various buildings. The plans must be included within the facility's on-site contingency plan. Also located emer. equip, and haz waste accumulation area. Revision is to be sent to emergency response groups as outlined in 265.53(b) preferably certified mail.
- 2) Revised contingency plan must be submitted to emergency response groups as outlined in 265.53(b), preferably certified mail.

10) Signatures:

James W. Wells
Inspector(s)/Reviewer

Tom Carter
Facility Contact

August 26, 1992 / Sept. 3, 1992.
Date(s)

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT, HEALTH, AND NATURAL RESOURCES
Hazardous Waste Section

File Name: Celomase Dreyfus

County: Mecklenburg

I, Terry Brasino, have been provided access to the above-named file by personnel of the Hazardous Waste Section, I understand that this statement shall be made a permanent part of any file which is viewed under the Freedom of Information provision of the North Carolina General Statutes.

Terry Brasino
Signature

Date: 6/9/93
Initials: PO

Facility Name: Hoechst Celanese City: Charlotte

EVALUATION DATA: New: Change: _____ Delete: _____ (_____ : Required)

Agency: Date: Mo. 05 / Day 21 / Year 93 Type: LB N Control Number Data Entry Personnel

Person: 027 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators		Transporters		TSD's					
GER	<input type="checkbox"/>	TGR	<input type="checkbox"/>	DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
GGR	<input type="checkbox"/>	TMR	<input type="checkbox"/>	DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
GLB	<input checked="" type="checkbox"/>	TOR	<input type="checkbox"/>	DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
G5Q	<input type="checkbox"/>	TRR	<input type="checkbox"/>	DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
GMR	<input type="checkbox"/>	TWD	<input type="checkbox"/>	DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
GOR	<input type="checkbox"/>			DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
GPT	<input type="checkbox"/>			DIN	<input type="checkbox"/>	DOT	<input type="checkbox"/>		
GRR	<input type="checkbox"/>								
GSC	<input type="checkbox"/>								

Compliance Schedule (TSD, Gen., Trans.)
 FEA CAS

Evaluation Comments:

(72) 1: * Land Ban Inspection - Docket # 93-279 issued on-site.
 2: _____

VIOLATION DATA: New: _____ Change: _____ Delete: _____

#1 Agency: Type: G/LB Date (mdy) Determined: 05/21/93 Class: 2

Priority: Branch: 01 Person: 027 Seq. Number (Data Entry) _____

Return to Compliance: 06/14/93 --- Scheduled --- Actual ---

Reg. Type: SR Reg. Description (30): 268.7(a)(1)

Comment (72): Land Ban Form not sent along with manifest # 00373

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry) _____

Return to Compliance: / / --- Scheduled --- Actual ---

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry) _____

Return to Compliance: / / --- Scheduled --- Actual ---

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

Solid Waste Management Division
Hazardous Waste Section

NOTICE OF VIOLATION

To: Hoechst Celanese
Address: 2300 Archdale Drive
Charlotte, N.C. 28210
EPA ID# NC0000602117

Docket # 93-274
Inspection Date 5/21/93
Facility Type CRS

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On May 21, 1993, Mr. Phillip Delp representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

<u>Citation</u>	<u>Specifics</u>
<u>1) 263.7(a)(1)</u>	<u>Facility did not send land ban form with manifest number 00373 (9/14/92).</u>

You are hereby required to comply with the noted violation(s) by June 14, 1993, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

5/21/93 (Date) Phillip Delp N.C. Hazardous Waste Section

I, Phillip Delp, hereby certify that I have personally served a copy of this Notice on:
Ms. P.E.M. Carter at Hoechst Celanese at Archdale
(Name) (Location)
on _____, 1993. Tom Carter
(Recipient Signature)

copies to: field files
central files
Regional Manager

RCRA INSPECTION REPORT

1) Facility Name:

ID Number: NCO 000 608117

Type of facility: LAG

Ownership: Hoechst Celanese.

Contact: Mr. P.E.M. Carter

Phone number: (704) 554-3510

Facility location (address): 2300 Archdale Drive

City, state, zip: Charlotte, N.C. 28210

2) Survey Participants:

Mr. Phillip Delp
P.E.M. Carter

3) Date of Inspection: 5/27/93

4) Purpose of Inspection: Unannounced inspection to determine compliance with 40 CFR 262.

5) Facility Description:

Processes: Hoechst Celanese is a research and development park, operating numerous laboratories throughout the facility

(Low Dose inspection)

Type Waste: -

Transporters: -

TSD's: -

Accumulation areas: -

Storage areas: -

Facility Name: Hoechst Celanese
ID #: NC000678117

6) Waste Minimization:

7) Site Deficiencies:

1) 268.7(a)(1) - Facility did not send land ban form with manifest number MF# 00373 (9/14/92)

8) Recommendations:

Signed:

Philip Day

Inspector/Reviewer

5/28/93

Date

Tom Carter

Facility Contact

Region IV CM&E Form - Side A

EPA ID:

N	C	D	0	0	0	6	0	8	1	1	7
---	---	---	---	---	---	---	---	---	---	---	---

Submitted by: _____	Date: _____
Entered by: _____	Date: _____

Facility Name: Hoichst Celanese

City: Charlotte

EVALUATION DATA: New: Change: Delete: (: Required)

Agency:

S

 Date: Mo.

1	2
---	---

 / Day

0	7
---	---

 / Year

9	2
---	---

Type:

C	S	E
---	---	---

Control Number											
Data Entry Personnel											

Person:

0	2	5
---	---	---

 Reason:

--	--

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators	
GER	
GGR	
GLB	
GSQ	
GMR	
GOR	
GPT	E
GRR	
GSC	

Transporters	
TGR	
TMR	
TOR	
TRR	
TWD	

TSD's					
DCH			DLB		
DCL			DLF		
DCP			DLT		
DFR			DMC		
DGS			DMR		
DGW			DOR		
DIN			DOT		
DPB			DPP		
DSI			DTR		
DTT			DWP		

Compliance Schedule (TSD, Gen., Trans.)					
FEA <table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td> </td><td> </td></tr></table>			CAS <table border="1" style="display: inline-table; border-collapse: collapse;"><tr><td> </td><td> </td></tr></table>		

Evaluation Comments:

- (72) 1 : Facility determined to be in compliance w/ NOV Docket # 92-409
 2 : _____

VIOLATION DATA: New: Change: Delete:

1 Agency:

S

 Type:

G	P	T
---	---	---

 Date (mdy) Determined:

0	9	/	0	3	/	9	2
---	---	---	---	---	---	---	---

 Class:

--

Priority:

--

 Branch:

0	1
---	---

 Person:

0	2	5
---	---	---

 Seq. Number (Data Entry)

--	--	--	--

Return to Compliance:

1	0	/	0	3	/	9	2
---	---	---	---	---	---	---	---

--	--	--	--

 Actual:

1	2	/	0	7	/	9	2
---	---	---	---	---	---	---	---

--	--	--	--

Reg. Type:

S	R
---	---

 Reg. Description (30): 262.34 w/ 265.16(c)

Comment (72): _____

2 Agency:

S

 Type:

G	P	T
---	---	---

 Date (mdy) Determined:

0	9	/	0	3	/	9	2
---	---	---	---	---	---	---	---

 Class:

--

Priority:

--

 Branch:

0	1
---	---

 Person:

0	2	5
---	---	---

 Seq. Number (Data Entry)

--	--	--	--

Return to Compliance:

1	0	/	0	3	/	9	2
---	---	---	---	---	---	---	---

--	--	--	--

 Actual:

1	2	/	0	7	/	9	2
---	---	---	---	---	---	---	---

--	--	--	--

Reg. Type:

S	R
---	---

 Reg. Description (30): 262.34 w/ 265.54(d)

Comment (72): _____

_____ Agency:

--

 Type:

--	--	--

 Date (mdy) Determined:

		/			/		
--	--	---	--	--	---	--	--

 Class:

--

Priority:

--

 Branch:

--	--

 Person:

--	--	--

 Seq. Number (Data Entry)

--	--	--	--

Return to Compliance:

		/			/		
--	--	---	--	--	---	--	--

--	--	--	--

 Actual:

		/			/		
--	--	---	--	--	---	--	--

--	--	--	--

Reg. Type:

--	--

 Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

December 7, 1992

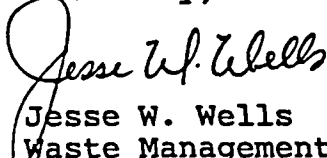
Ms. PEM Carter
Hoechst Celanese
Post Office Box 32414
Charlotte, North Carolina 28232
NCD 000 608 117

Dear Ms. Carter:

Attached is a copy of the follow-up inspection audit to the Notice of Violation Docket #92-409. The information that you submitted was reviewed by this Office. Based on this review, no violations were noted. The attached copy of this audit inspection form is to inform you of this and for your records.

If you have any questions or need any further assistance concerning this matter, please feel free to contact me at my Office between the hours of 8:00 a.m. and 5:00 p.m. at (704) 663-1699.

Sincerely,


Jesse W. Wells
Waste Management Specialist
Hazardous Waste Section

Attachment

cc: Mr. Keith Masters, Western Area Supervisor
Raleigh Office Files

JWW/pl

RCRA INSPECTION REPORT

1) Facility Information:

Hoechst Celanese
2300 Archdale Drive
Charlotte, N.C. 28210
NCD 000 608 117

2) Facility Contact:

Ms. PEM Carter

3) Survey Participants:

ms. PEM Carter
Mr. Jesse Wells

4) Date(s) of Inspection:

December 7, 1992

5) Purpose of the Survey:

A facility audit in order to determine compliance with the Resource Conservation and Recovery Act, specifically NDV Docket # 92-409

6) Facility Description: No change

7) Waste Minimization

8) Site Deficiencies:

262.34(a)(4) ref 265.16(c)
265.54(d)

Based upon information submitted by the facility, the deficiencies noted on August 26 & September 3, 1992 have been corrected. The facility is determined to be in compliance with NOV Docket # 92-409.

9) Recommendations:

10) Signatures:

Jesse W. Wells
Inspector(s)/Reviewer
December 7, 1992
Date(s)

Facility Contact



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

December 7, 1992

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Sincerely,

A handwritten signature in cursive script that reads "Jesse W. Wells".

Jesse W. Wells
Waste Management Specialist
Hazardous Waste Section

Attachment

cc: Mr. Keith Masters, Western Area Supervisor
Raleigh Office Files

JWW/pl

RCRA INSPECTION REPORT

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9) Recommendations:

10) Signatures:

Jesse W. Uells
Inspector(s)/Reviewer
December 7, 1992
Date(s)

Facility Contact

FAX MESSAGE FORM

DATE: Dec 8, 1992

TO: Jesse Kelly

LOCATION: Mooresville

PHONE EXT:

FROM: PEM Carter

Phone #: 554-3020

Location: HOECHST CELANESE
CHARLOTTE, NC
DREYFUS RESEARCH PARK

FAX #: 704-554-3293

NUMBER OF PAGES INCLUDING COVER SHEET:

(DOCUMENT BEING FAXED)

NOTES:

Attached are the following:

Training records

Update to Local's pertaining to Contingency

Evacuation Routes

Post-It™ brand fax transmittal memo 7671		# of pages > 36
To	JESSE WEL	
From	PEM CARTER	
Co.	MOORESVILLE	
Co.	HOECHST CELANESE	
Dept.		
Phone #	554-3020	
Fax #	663-6040	Fax # 3293

Hoechst Celanese Emergency

Brigade Training Center

This certifies that

RON E. CALDWELL

has completed a training course in
 Basic Industrial Fire Fighting and
 Hazardous Material Technician Training

(Eight Hours Refresher)

and has satisfactorily demonstrated the required
 knowledge and skills as set fourth by the joint
 requirements of this training facility, the United
 States Environmental Protection Agency, SARA Title I,
 and the United States Department of Labor -
 OSHA (CFR 1910.120 and CFR 1910.156).

This 28 day of October, 19 92




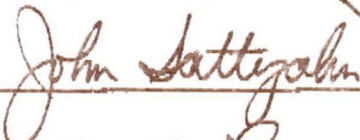


[Signature]
 HCC Training Center
 Coordinator

[Signature]
 HCC Program
 Coordinator

EMERGENCY COORDINATOR TRAINING

DATE: September 22, 1992

Training Log:

<u>Name (PRINT)</u>	<u>Signature</u>	<u>Title</u>
Gregory Johnson		Research Director
RICHARD SUMMERS		SERVICES MGR.
RONALD FOLTZ		Research Director
JOHN SATTIZAHN		Section Leader
RON BAILEY		SECTION LEADER
RON CALDWELL		EH'S Supt.


 Instructor

AGENDA**EMERGENCY PREPAREDNESS TRAINING**

- I. PURPOSE AND REQUIREMENTS OF PLAN
- II. EMERGENCY COORDINATORS DUTIES
- III. ROLES & RESPONSIBILITIES OF RESPONDERS
- IV. IMPLEMENTATION OF PLAN
- V. EMERGENCY RESPONSE - ON-SITE EVENT
- VI. EMERGENCY RESPONSE - OFF-SITE EVENT
- VII. CONTAINMENT & CONTROL MEASURERS
- VIII. FOLLOW-UP ACTIONS
- IX. EMERGENCY EQUIPMENT
- X. COORDINATION AGREEMENTS
- XI. WEEK-END DUTY OF EMERGENCY COORDINATORS

SLIDE 1

I. PURPOSE AND REQUIREMENTS TO PLAN

■ BLUE BOOK - COMMITMENT TO EH&S PROTECTION

■ REGULATORY REQUIREMENTS

- RCRA
- CERCLA (SUPERFUND)
- SPCC
- SARA
- ETC.

II. EMERGENCY COORDINATORS & THEIR DUTIES [PAGE 1 - 3]

■ FAMILIARITY WITH:

- PLAN
- SITE ACTIVITIES AND OPERATIONS
- GENERAL KNOWLEDGE OF HAZARD MATERIALS AT THE SITE
- FACILITY LAYOUT
- RECORDS LOCATIONS

■ COMMITTING RESOURCES TO CARRY OUT PLAN

■ ASSESSING POSSIBLE HAZARDS TO HEALTH & ENVIRONMENT

■ AUTHORIZING APPROPRIATE RESPONSE ACTION FOR HEALTH & ENVIRONMENT PROTECTION

■ DIRECTING COMMUNICATIONS (INTERNAL & EXTERNAL)

SLIDE 2

III. ROLES & RESPONSIBILITIES OF RESPONDERS [PAGES 3 - 7]

- ON-SITE INCIDENT COMMANDERS (OIC) [PAGES 3 - 5]
- HAZMAT TEAM [PAGES 5 - 6]
- EMERGENCY BRIGADE [PAGE 6]
- SKILLED SUPPORT PERSONNEL [PAGE 6]
- HAZARDOUS WASTE HANDLERS [PAGE 6]
- SECURITY

IV. IMPLEMENTATION OF PLAN [PAGE 7]

- CONDITIONS THAT MUST EXIST FOR AN "EMERGENCY RESPONSE"
- EXAMPLES OF POSSIBLE "EMERGENCY RESPONSE SITUATIONS"

SLIDE 2A

TWO CONDITIONS MUST EXIST TO CONSTITUTE AN "EMERGENCY RESPONSE"

1. THE NATURE OF THE RELEASED MATERIAL AND ITS AMOUNT OR CONDITION TRULY POSES A SIGNIFICANT HAZARD TO HUMAN LIFE OR THE ENVIRONMENT.
2. CONTROL OF THE RELEASE REQUIRES A COORDINATED RESPONSE FROM OUTSIDE THE RELEASE AREA.

EXAMPLES OF POSSIBLE EMERGENCY RESPONSE SITUATIONS

- ON-SITE SPILLAGE OF HAZARDOUS CHEMICALS IN SIGNIFICANT QUANTITIES (RQ)
- OFF-SITE SPILLAGE OF HCC DRP HAZARDOUS SUBSTANCES
- A SIGNIFICANT VAPOR RELEASE OF DOWTHERM
- NATURAL GAS RELEASE
- ON-SITE FIRE/EXPLOSION INVOLVING HAZARDOUS SUBSTANCES
- SITUATIONS OF IDLH (IMMEDIATE DANGER TO LIFE & HEALTH) - TOXICITY, OXYGEN DISPLACEMENT, SIGNIFICANT OVER-EXPOSURE, ETC.

SLIDE 3

- V. EMERGENCY RESPONSE - ON-SITE EVENT [PAGES 8 - 12]
 - A. INITIATION OF SITE INCIDENT NOTIFICATION [PAGE 8]
 - B. EMPLOYEE SAFETY/EVACUATION [PAGE 9]
 - C. EMERGENCY RESPONSE SEQUENCE [PAGES 9 - 12]
 - FIRST RESPONDERS
 - SECURITY
 - MAINTENANCE AND UTILITY PERSONNEL
 - ON-SITE INCIDENT COMMANDERS
 - D. EMERGENCY COORDINATORS
 - BASE LOCATION(S) [PAGE 11]
 - RISK ASSESSMENT [PAGE 12]
 - NOTIFICATIONS/REPORTING
 - INTERNAL [PAGE 14]
 - EXTERNAL [PAGE 16]

SLIDE 4

VI. EMERGENCY RESPONSE - OFF-SITE EVENT [PAGE 12]

- EXAMPLES
- INVOLVEMENT
- NOTIFICATION/REPORTING

VII. CONTAINMENT AND CONTROL MEASURES [PAGE 13]

- EXAMPLES

VIII. FOLLOW-UP ACTIONS [PAGES 17 - 19]

- CLEAN-UP OPERATIONS
- PLAN REVISION
- WRITTEN REPORTS

IX. EMERGENCY EQUIPMENT [PAGES 19 - 21]

X. COORDINATION AGREEMENTS [PAGES 22 - 23]

XI. INDEX CONTENT

SCENARIO:

On Thursday, at 1:12PM, an explosion occurs while an acetone tanker is unloading product at the acetone tank farm located behind the Allen Building. A violent fire results, with subsequent explosions; most of the windows in Allen are shattered, with a few windows shattered in Stoll, Engineering, and Resource buildings. An HCC employee, assisting in the acetone unloading, and the truck driver are presumed dead. Four contract personnel and another HCC employee were nearby when the explosion occurred and are also injured (extent unknown). At 1:13PM, an Allen building employee calls the 3330 number and reports the emergency; Security announces the evacuation command of Allen Building and calls 911. 1:14PM; the Emergency Brigade (11 people) is on the scene and evacuation of the Allen Building has begun.

At 1:19PM, a member of the EH&S Dept. has informed the Emergency Coordinator of the above details.

The City Fire/Hazmat team arrives at the site at 1:20PM and takes control. EH&S, Brigade, and knowledgeable acetate pilot plant personnel are working with the Fire Chief in providing relevant details. The Fire Department begins combating the fire at 1:25PM and sets-up their incident command center. Winds are out of the south east, blowing towards the Allen Building, and the fire is out of control at this time.

You are the Emergency Coordinator, what are your actions???

Emergency Coordinator's Checklist of Actions

1. Establish contact with the On-Scene-Incident-Commander.
2. Obtain two-way radio unit from Guard Station.
3. Appoint couriers to provide assistance in handling the emergency communications.
4. Evaluate the situation and circumstances surrounding the incident, and get the facts.
5. Ensure appropriate responses are taken to control the incident, and direct actions as necessary for the protection of human life and the environment.
6. Establish your base location and report to Security where you are located and how you may be reached.
7. Initiate evacuation responses as necessary (on and off-site).
8. Determine any additional resources that may be needed to control the immediate situation.
9. Write down the facts (number injured, type of incident, time of incident, circumstances, & other pertinent information).
10. Notify appropriate site, Company, and Corporate officials and personnel.
11. Direct the notification of appropriate local, State, and Federal agencies.
12. Contact Communication and Public Affairs Coordinator and begin preparing press announcement.
13. Direct the notification of appropriate elected officials.
14. Designate a principle spokesperson and notify Security and switchboard operator of this person.
15. Direct Media conference location and arrangements.
16. Advise the community members of the Community Advisory Panel of the emergency incident.
17. Continue to monitor the situation from a centralized location.
18. As appropriate, set-up an employee information phone line for those that may be calling-in.

Hoechst Celanese

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
TO: R. E. Caldwell

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

September 25, 1992

REC:92:62

Mr. Bart T. Massey, Hazardous Materials Coordinator
Charlotte/Mecklenburg Emergency Management Office
600 East 4th Street
Charlotte, North Carolina 28202 - 2852

SUBJECT: Hoechst Celanese - Dreyfus Research Park, 2300 Archdale Drive, Contingency Plan and Emergency Procedures

Dear Mr. Massey:

Please find enclosed a revised Contingency Plan and Emergency Procedures manual for the Hoechst Celanese Dreyfus Research Park facility located at 2300 Archdale Drive in Charlotte. This manual supersedes all previous Dreyfus Research Park Plans sent to your facility.

This Plan is required pursuant to the Environmental Protection Agency's rules for Hazardous Waste Generators, as defined in the Code of Federal Regulations, CFR 40 Part 264, Subpart D. In accordance with this Subpart, copies of this Plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services in an event involving outside assistance in the implementation of this Plan. This Plan must also describe the arrangements agreed to by those outside departments and organizations, such as yours, in coordinating emergency services to our site in the event of such an emergency.

Hoechst Celanese appreciates your cooperation in maintaining a copy of this Plan at your organization's office. If you have any questions regarding the necessity for such or the Plan itself, please do not hesitate to call me at 554-3510.

Sincerely,



Ron E. Caldwell
Environmental, Health, & Safety Supt.
Hoechst Celanese Corporation

Enclosure

CC: R. M. Summers - 811
P.E.M. Carter - 466

Hoechst Celanese

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
TO: R. E. Caldwell

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

September 25, 1992

REC:92:67

Mr. L. Wayne Broome, Chairman LEPAC
600 East 4th Street
Charlotte, North Carolina 28202-2852

SUBJECT: Hoechst Celanese - Dreyfus Research Park, 2300 Archdale Drive, Contingency Plan and Emergency Procedures

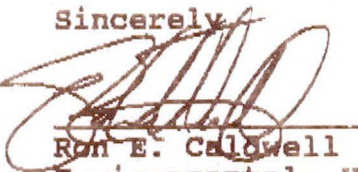
Dear Mr. Broome:

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Ron E. Caldwell
Environmental, Health, & Safety Supt.
Hoechst Celanese Corporation

Enclosure

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Hoechst Celanese

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
TO: R. E. Caldwell

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

September 25, 1992

REC:92:66

Battalion 5, Chief
Charlotte Fire Department
Station 16
6623 Park South Drive
Charlotte, North Carolina 28210

SUBJECT: Hoechst Celanese - Dreyfus Research Park, 2300 Archdale Drive, Contingency Plan and Emergency Procedures

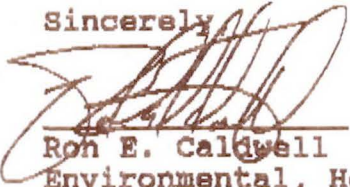
Dear Chief:

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Ron E. Caldwell
Environmental, Health, & Safety Supt.
Hoechst Celanese Corporation

Enclosure

CC: R. M. Summers - 811
P.E.M. Carter - 466

Hoechst Celanese

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
TO: R. E. Caldwell

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

September 25, 1992

REC:92:61

Mr. Richard L. Dean, Operations Manager
Mecklenburg County Emergency Medical Service
618 North College Street
Charlotte, North Carolina 28202

SUBJECT: Hoechst Celanese - Dreyfus Research Park, 2300 Archdale Drive, Contingency Plan and Emergency Procedures

Dear Mr. Dean:

Please find enclosed a revised Contingency Plan and Emergency Procedures manual for the Hoechst Celanese Dreyfus Research Park facility located at 2300 Archdale Drive in Charlotte. This manual supersedes all previous Dreyfus Research Park Plans sent to your facility.

This Plan is required pursuant to the Environmental Protection Agency's rules for Hazardous Waste Generators, as defined in the Code of Federal Regulations, CFR 40 Part 264, Subpart D. In accordance with this Subpart, copies of this Plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services in an event involving outside assistance in the implementation of this Plan. This Plan must also describe the arrangements agreed to by those outside departments and organizations, such as yours, in coordinating emergency services to our site in the event of such an emergency.

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Sincerely,


Ron E. Caldwell
Environmental, Health, & Safety Supt.
Hoechst Celanese Corporation

Enclosure

CC: R. M. Summers - 811
P.E.M. Carter - 466

Hoechst Celanese

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
TO: R. E. Caldwell

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

September 25, 1992

REC:92:63

Mr. Edward J. Schlicksup, Jr., FACHE, President
Mercy Hospital
2001 Vail Avenue
Charlotte, North Carolina 28207

SUBJECT: Hoechst Celanese - Dreyfus Research Park, 2300 Archdale Drive, Contingency Plan and Emergency Procedures

Dear Mr. Schlicksup:

Please find enclosed a revised Contingency Plan and Emergency Procedures manual for the Hoechst Celanese Dreyfus Research Park facility located at 2300 Archdale Drive in Charlotte. This manual supersedes all previous Dreyfus Research Park Plans sent to your facility.

This Plan is required pursuant to the Environmental Protection Agency's rules for Hazardous Waste Generators, as defined in the Code of Federal Regulations, CFR 40 Part 264, Subpart D. In accordance with this Subpart, copies of this Plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services in an event involving outside assistance in the implementation of this Plan. This Plan must also describe the arrangements agreed to by those outside departments and organizations, such as yours, in coordinating emergency services to our site in the event of such an emergency.

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Sincerely,



Ron E. Caldwell
Environmental, Health, & Safety Supt.
Hoechst Celanese Corporation

Enclosure

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P.E.M. Carter - 466

Hoechst Celanese

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
TO: R. E. Caldwell

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

September 25, 1992

REC:92:64

Mr. Paul F. Betzold, FACHE, Executive Vice
President and Chief Operating Officer
Presbyterian Hospital
200 Hawthorne Lane
Charlotte, North Carolina 28233-3549

SUBJECT: Hoechst Celanese - Dreyfus Research Park, 2300 Archdale Drive, Contingency Plan and Emergency Procedures

Dear Mr. Betzold:

Please find enclosed a revised Contingency Plan and Emergency Procedures manual for the Hoechst Celanese Dreyfus Research Park facility located at 2300 Archdale Drive in Charlotte. This manual supersedes all previous Dreyfus Research Park Plans sent to your facility.

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Sincerely,



R. E. Caldwell
Environmental, Health, & Safety Supt.
Hoechst Celanese Corporation

Enclosure

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P.E.M. Carter - 466

Hoechst Celanese

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
TO: R. E. Caldwell

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

September 25, 1992

REC:92:65

Mr. D. R. Stone, Chief
Charlotte Law Enforcement Center
825 East 4th Street
Charlotte, North Carolina 28202

SUBJECT: Hoechst Celanese - Dreyfus Research Park, 2300 Archdale Drive, Contingency Plan and Emergency Procedures

Dear Chief Stone:

Please find enclosed a revised Contingency Plan and Emergency Procedures manual for the Hoechst Celanese Dreyfus Research Park facility located at 2300 Archdale Drive in Charlotte. This manual supersedes all previous Dreyfus Research Park Plans sent to your facility.

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Sincerely,



Ron E. Caldwell
Environmental, Health, & Safety Supt.
Hoechst Celanese Corporation

Enclosure

CC: R. M. Summers - 811
P.E.M. Carter - 466

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address

2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Battalion 5, Chief
 Charlotte Fire Dept.
 Station 16
 6623 Park South Drive
 Charlotte, NC 28210

4a. Article Number
 P 837 257 642

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 10-8-92

5. Signature (Addressee)

6. Signature (Agent)
[Signature]

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆ U.S.G.P.O.: 1992-307-530

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

DOMESTIC RETURN RECEIPT

SENDER:

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2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Richard L. Dean
 Mecklenburg County Emergency
 Medical Service
 618 N. College Street
 Charlotte, NC 28202

4a. Article Number
 P 837 257 936

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 10-7-92

5. Signature (Addressee)

6. Signature (Agent)
[Signature]

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆ U.S.G.P.O.: 1992-307-530

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- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.
Number
257 642

Service Type
 Insured
 COD
 Return Receipt for Merchandise

Delivery
D-8-92

Addressee's Address (Only if requested and fee is paid)

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3. Article Addressed to:
 L. Wayne Broome
 600 E. 4th St.
 Charlotte, NC 28202-2852

5. Signature (Addressee)

6. Signature (Agent)
L. Broome

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.
4a. Article Number
P 837 257 644

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
10-7-92

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 • U.S.G.P.O. : 1992-307-530

DOMESTIC RETURN RECEIPT

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.
Number
257 936

Service Type
 Insured
 COD
 Return Receipt for Merchandise

Delivery
7-92

Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

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- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:
 Bart T. Massey
 Charlotte/Meck. Emergency Mgt
 Office
 600 E. 4th Street
 Charlotte, NC 28202-2852

5. Signature (Addressee)

6. Signature (Agent)
B. Massey

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.
4a. Article Number
P 837 257 643

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

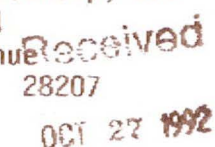

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10-7-92

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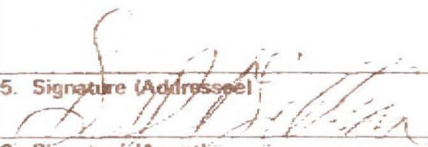
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PS Form 3811, December 1991 • U.S.G.P.O. : 1992-307-530

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	3. Article Addressed to: Edward J. Schlicksup, Jr. Mercy Hospital 2001 Vail Avenue Charlotte, NC 28207 <div style="text-align: center; margin-top: 10px;">  </div>		4a. Article Number P 837 257 634		
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise			
		7. Date of Delivery 10/12/92			
5. Signature (Addressee) E. J. S.		8. Addressee's Address (Only if requested and fee is paid)			
6. Signature (Agent) 					
		PS Form 3811 , December 1991 U.S.G.P.O. : 1992-307-530		DOMESTIC RETURN RECEIPT	

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	3. Article Addressed to: D. R. Stone Charlotte Law Enforcement Ctr. 825 E. 4th Street Charlotte, NC 28202		4a. Article Number P 069 949 419		
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise			
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6. Signature (Agent)					
		PS Form 3811 , December 1991 U.S.G.P.O. : 1992-307-530		DOMESTIC RETURN RECEIPT	

Thank you for using Return Receipt Service.

NORTH CAROLINA STATE UNIVERSITY

Presents this certificate to

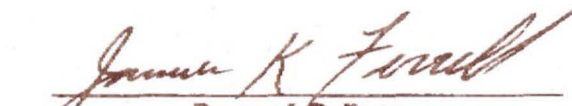
P.E.M. CARTER

for participation in

**MANAGEMENT AND MINIMIZATION OF HAZARDOUS WASTE
UNDER RCRA**

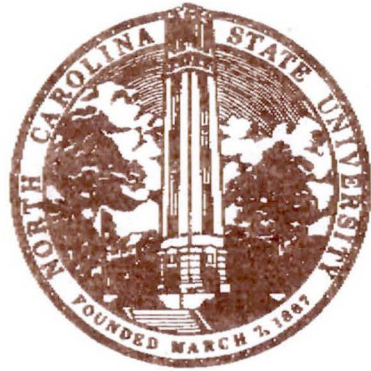
NOVEMBER 5-6, 1992


Allen S. White
Interim Vice Chancellor


James K. Forell
Dean of College


Edgar B. Houston
Director of Office of Continuing Education
and Professional Development

**A CONTINUING EDUCATION/PROFESSIONAL DEVELOPMENT PROGRAM
OF THE COLLEGE OF ENGINEERING**



Ben Carter
A. Hended

NORTH CAROLINA STATE UNIVERSITY
DEPARTMENT OF LIFELONG EDUCATION

AND

L.A. WEAVER COMPANY
308 EAST JONES STREET
RALEIGH, NC 27601

PRESENTS

HAZARDOUS WASTE MANAGEMENT UNDER RCRA

NOVEMBER 4 - 6, 1992

CHARLOTTE, NORTH CAROLINA

WEDNESDAY, NOVEMBER 4, 1992

1:00 - 1:20	C. ESTERLY	WELCOME, DISCUSSION OF SCHEDULE AND HANDOUTS, INTRODUCTIONS
1:20 - 2:45	N. LAMBERT	THE N.C. REGULATIONS. WHAT IS A HAZARDOUS WASTE: CHARACTERISTICS AND LISTS. KEY PROVISIONS.
2:45 - 3:00		BREAK
2:45 - 5:00	C. ESTERLY	REVIEW OF RCRA REQUIREMENTS: RECORDINGKEEPING, MANIFESTS, WASTE MINIMIZATION, CONTINGENCY PLANS, TRAINING.

HAZARDOUS WASTE MANAGEMENT UNDER RCRA

THURSDAY, NOVEMBER 5, 1992

8:00 - 8:15

REGISTRATION

8:15 - 8:35

A. WEAVER

WELCOME, DISCUSSION OF SCHEDULE AND HANDOUTS, INTRODUCTIONS

8:35 - 10:00

R. PURSELL

STRUCTURE OF THE DEPT. OF ENVIRONMENT, HEALTH & NATURAL RESOURCES; COMMONLY ASKED QUESTIONS. VIOLATIONS AND SIGNIFICANT COMPLIANCE ISSUES. ANNUAL REPORT DATA; SHORT FORM COMPLIANCE ORDER; WHAT A FIELD INSPECTOR LIKES TO SEE (A MODEL FACILITY)

10:00 - 10:20

BREAK

10:20 - 10:50

A. WEAVER

ANNUAL REPORT REQUIREMENTS

10:50 - 12:00

R. MORTON

THE LAND BAN, LEGAL ISSUES FOR THE GENERATOR RELATED TO ENVIRONMENTAL AUDITS AND OTHER CURRENT LEGAL TOPICS

12:00 - 1:00

LUNCH

1:00 - 2:00

A. WEAVER

WASTE DISPOSAL OPTIONS AND RESOURCES
• SELECTING A COMPANY FOR HAZARDOUS WASTE SERVICE
• PROCEDURES FOR SELECTING A LABORATORY
• FULL SERVICE COMPANY OPTIONS

2:00 - 2:10

BREAK

2:10 - 2:50

A. WEAVER

USE OF HAZARDOUS WASTE AS A FUEL; BOILER AND INDUSTRIAL FURNACE REQUIREMENTS

2:50 - 3:50

A. WEAVER

EMERGENCY AND CONTINGENCY PLANS WITH GROUP INPUT ON THEIR EXPERIENCES (CHAPTER 13)

3:50 - 4:00

BREAK

4:00 - 4:45

A. WEAVER

DETERMINING AND MEETING TRAINING AND RETRAINING NEEDS; SARA TRAINING REQUIREMENTS; OSHA BLOODBORNE PATHOGEN REQUIREMENTS (CHAPTER 10)

*'Robin' DEANR:
Haz Waste Section - Compliance Branch**'Rick'**SPCC
RCRA
CONTINGENCY*

FRIDAY, NOVEMBER 6, 1992

8:15 - 8:40	A. WEAVER	PACKING AND TRANSPORTATION OF HAZARDOUS WASTES; PLACARDS, LABELS, CONTAINERS, UNIFORM MANIFESTS (CHAPTER 11)
8:40 - 9:15	A. WEAVER	WASTE MINIMIZATION PRACTICES. VIDEO TAPE #1 "THE LAW, BENEFITS, SOURCES OF HELP". (CHAPTER 4, CHAPTER 12)
9:15 - 10:00	A. WEAVER	WASTE MINIMIZATION: AN OVERVIEW OF THE PROCEDURES; MASS BALANCE AS A METHOD
10:00 - 10:15		BREAK
10:15 - 11:00	T. ALBRECHT	OFFICE OF WASTE REDUCTION
11:00 - 11:30	A. WEAVER	WASTE MINIMIZATION: RECYCLING AND PROCESS MODIFICATION
11:30 - 12:00	A. WEAVER	WASTE MINIMIZATION IN PARTS AND EQUIPMENT CLEANING (CHAPTER 6)
12:00 - 1:00		LUNCH
1:00 - 1:40	A. WEAVER	THE REGULATION AND MANAGEMENT OF USED OIL (CHAPTER 9)
1:40 - 2:10	A. WEAVER	MANAGING AND RECYCLING SOLVENTS (CHAPTER 8)
2:10 - 2:30		BREAK
2:30 - 3:00	A. WEAVER	TECHNIQUES FOR MANAGING AND MINIMIZING METAL SLUDGES (CHAPTER 7)
3:00 - 3:45	A. WEAVER	PARTICIPANT'S EXPERIENCE IN WASTE MINIMIZATION AND DISPOSAL (CHAPTER 3, APPENDIX C)
3:45 - 4:00	A. WEAVER	REVIEW, QUESTIONS, FINAL CRITIQUE, CERTIFICATES.

APRIL 1, 1993 DEADLINE
 HAZMAT HM-126M
 HM-181

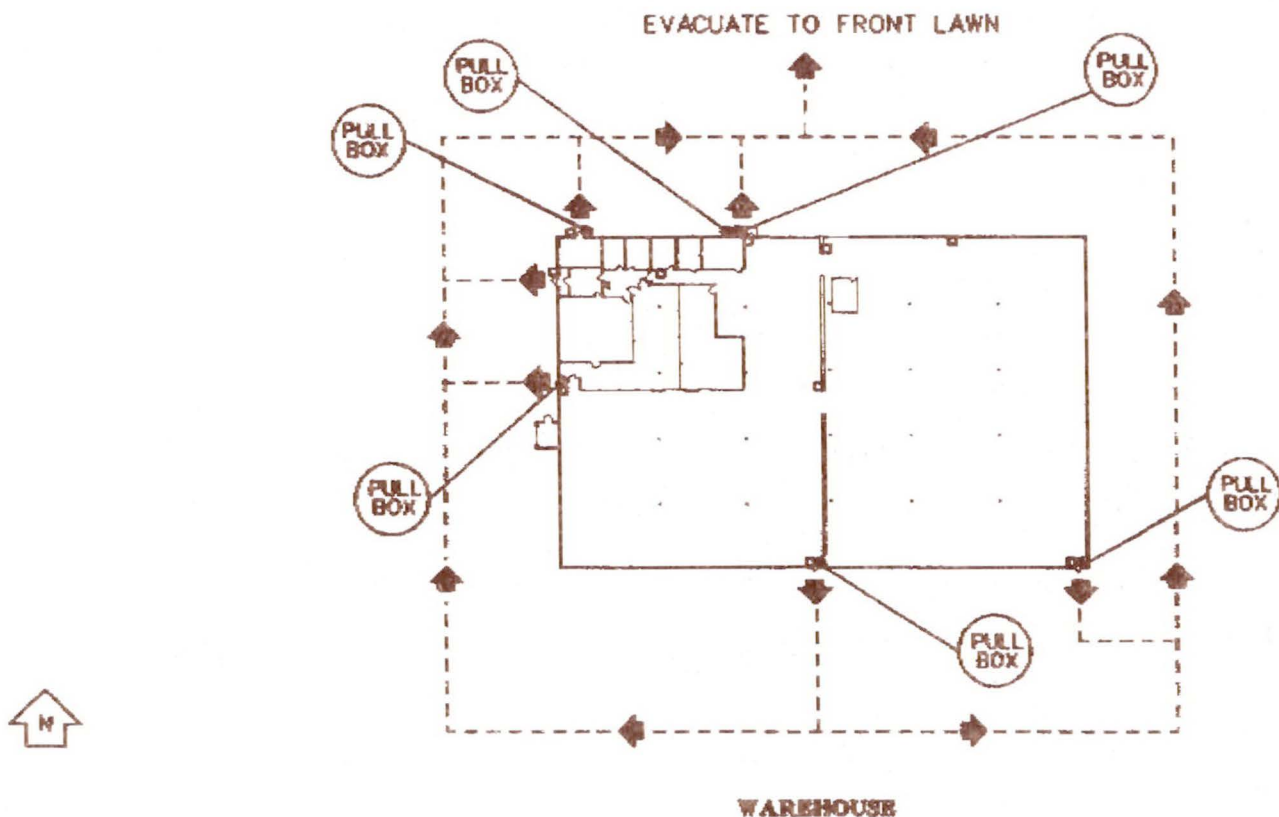
WASTE MATERIAL }
 SUBSTANCES } REQ'S
 } CERTIFICATION

EMERGENCY EXIT PLAN

ALARM SIGNAL

THE EMERGENCY ALARM IS A RISING AND FALLING "WHOOPIING" SOUND. IN THE EVENT OF AN ALARM, IF THERE IS A CLEAR SIGN OF A FIRE/EMERGENCY, VACATE IMMEDIATELY. IF THERE IS NO SIGN OF FIRE/EMERGENCY PRESENT, WAIT FOR A VOICE ANNOUNCEMENT OVER THE EMERGENCY ALARM SYSTEM FOR FURTHER INSTRUCTIONS.

☐ DENOTES FIRE EXTINGUISHER



PLEASE FAMILIARIZE YOURSELF WITH THE LOCATION OF THE NEAREST EMERGENCY EXIT STAIRWAY, AND PULL BOX.
IN THE UNLIKELY EVENT OF A FIRE/EMERGENCY PLEASE MOVE QUICKLY BUT CALMLY TO THE NEAREST EXIT.

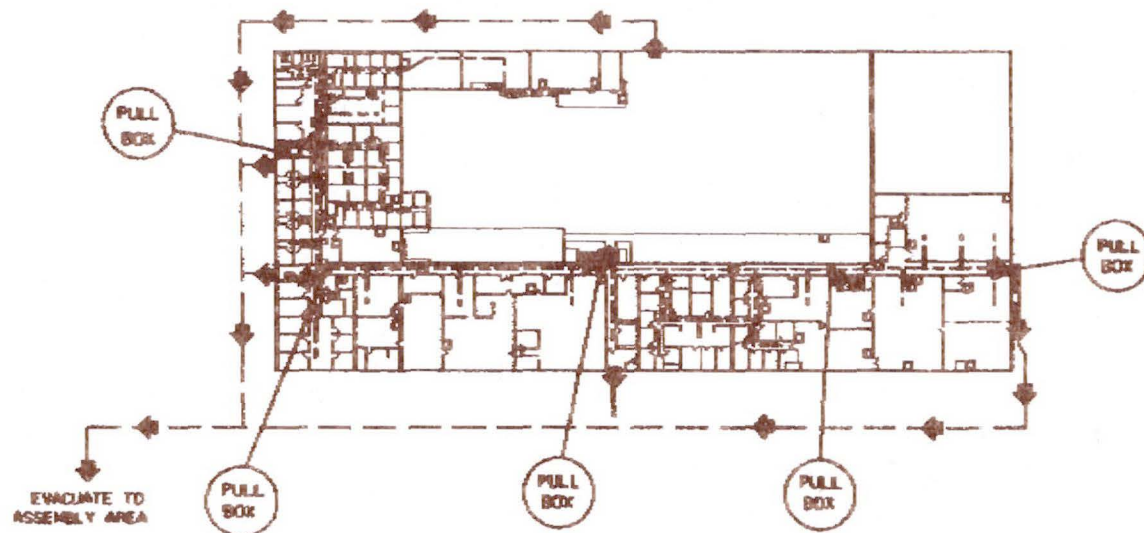
TO REPORT FIRE OR OTHER EMERGENCY CALL 3330

EMERGENCY EXIT PLAN

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□ DENOTES FIRE EXTINGUISHER



STOLL 2ND. FLOOR

PLEASE FAMILIARIZE YOURSELF WITH THE LOCATION OF THE NEAREST EMERGENCY EXIT STAIRWAY, AND PULL BOX. IN THE UNLIKELY EVENT OF A FIRE / EMERGENCY PLEASE MOVE QUICKLY BUT CALMLY TO THE NEAREST EXIT.

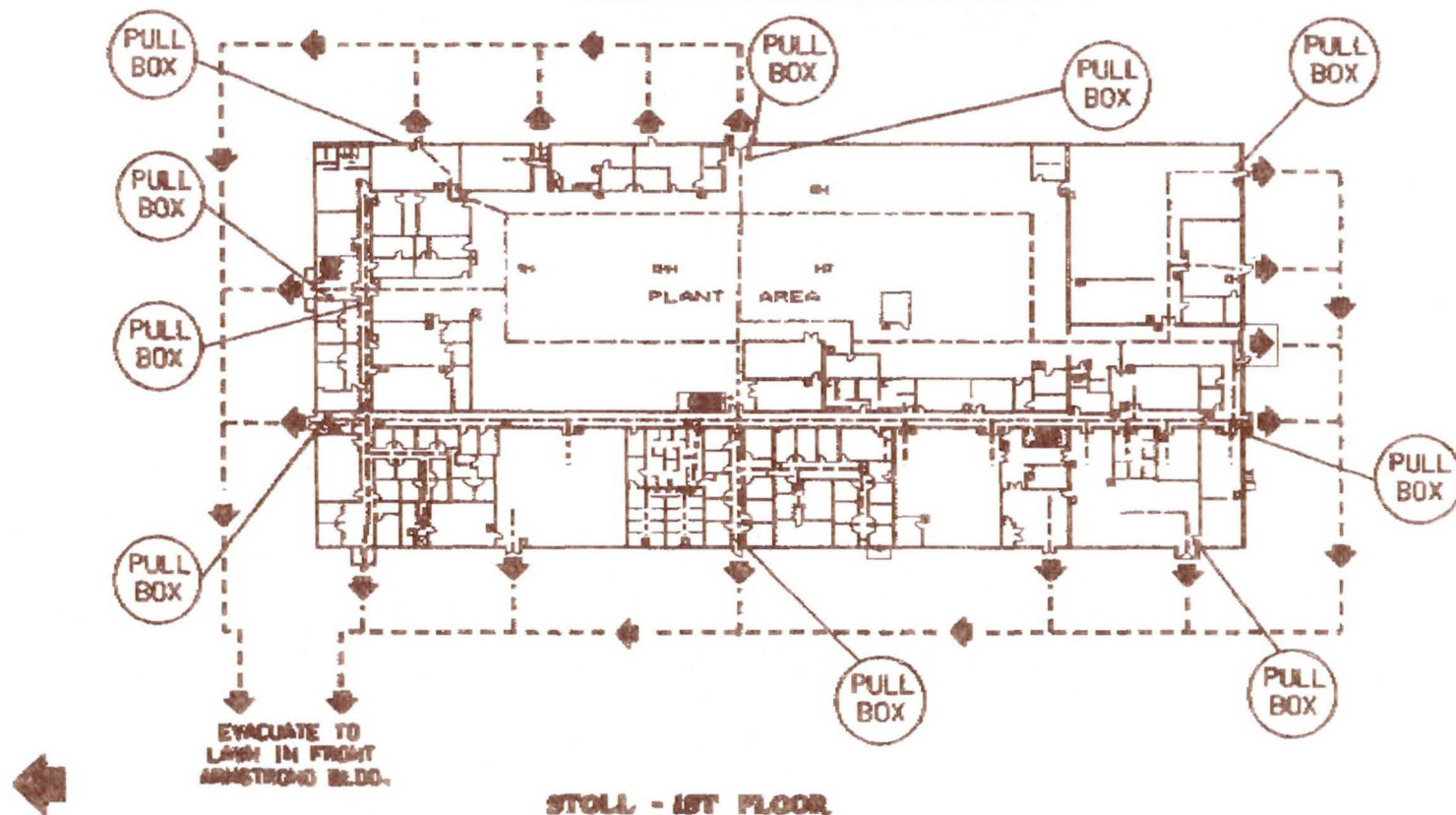
TO REPORT FIRE OR OTHER EMERGENCY CALL 3330

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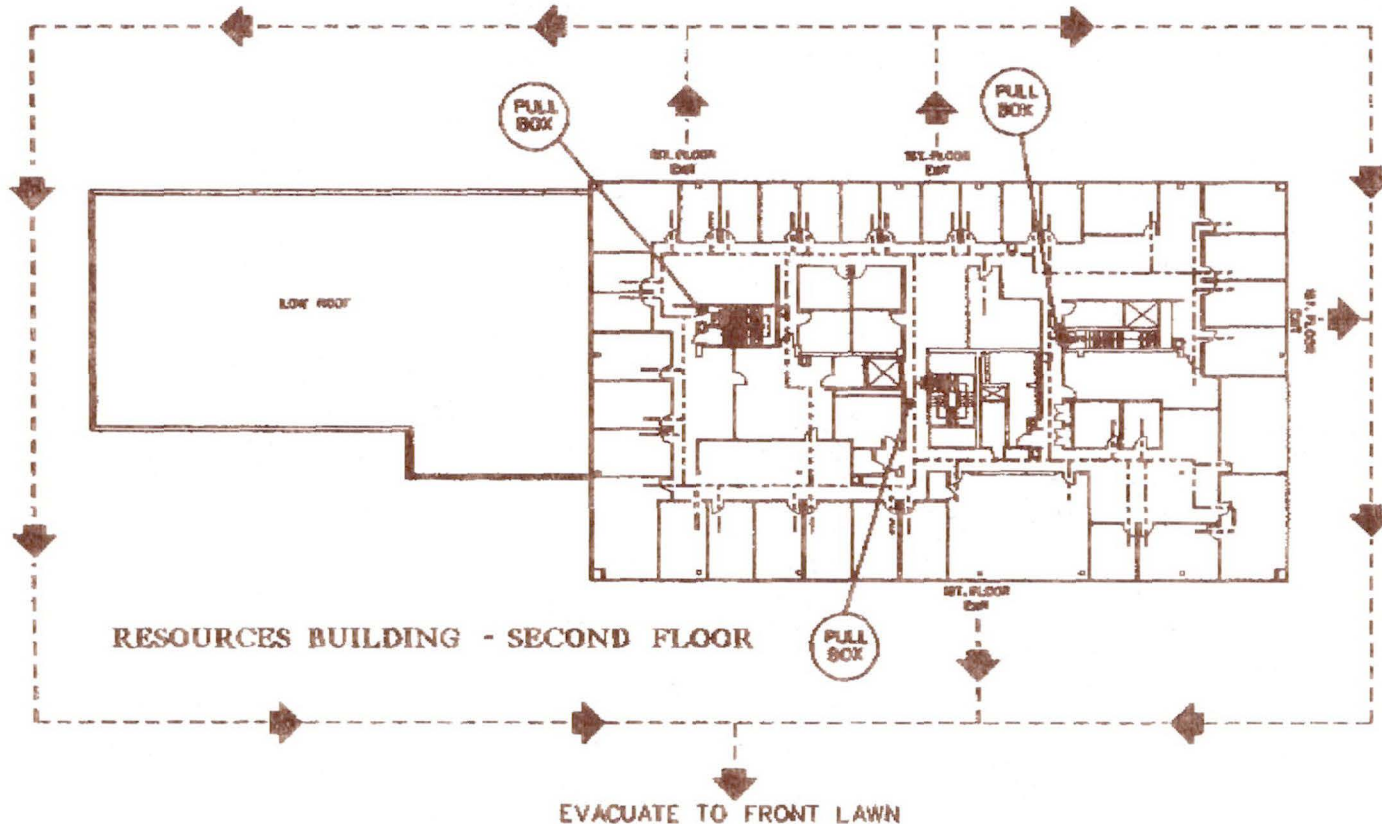
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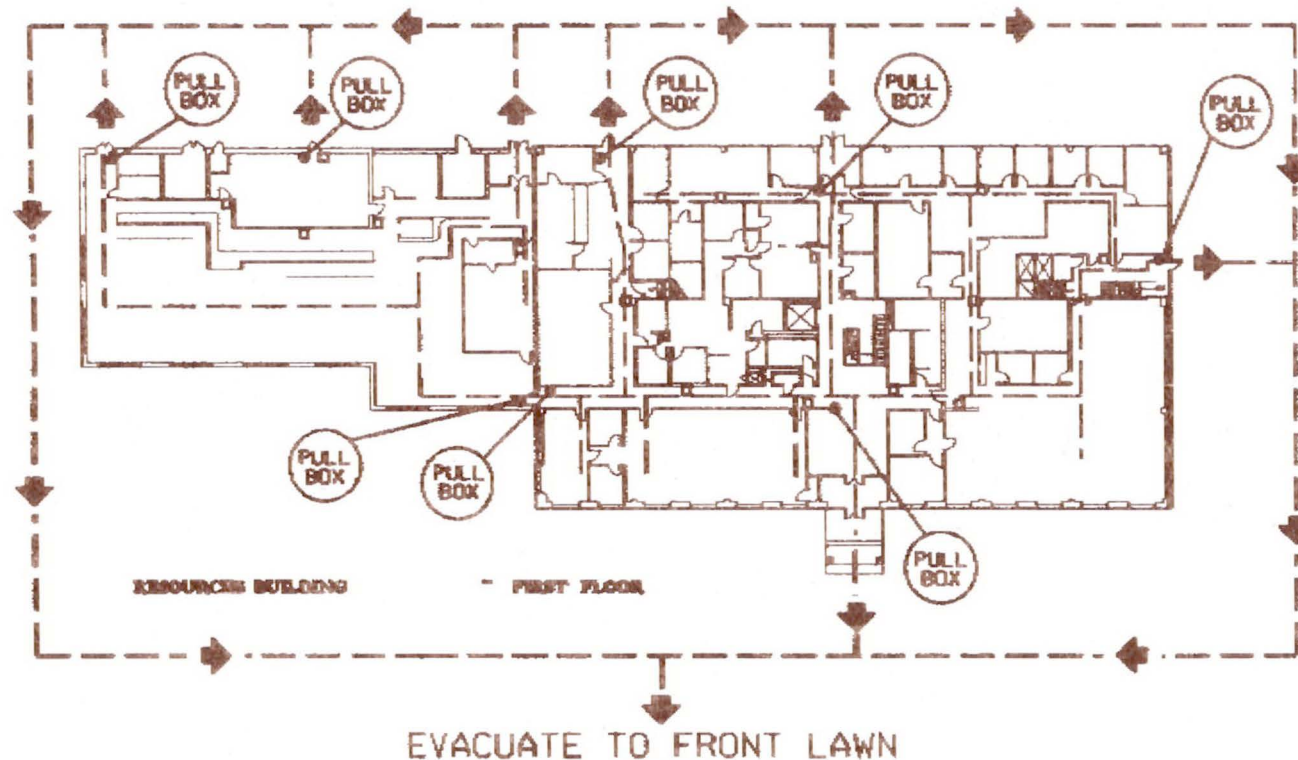
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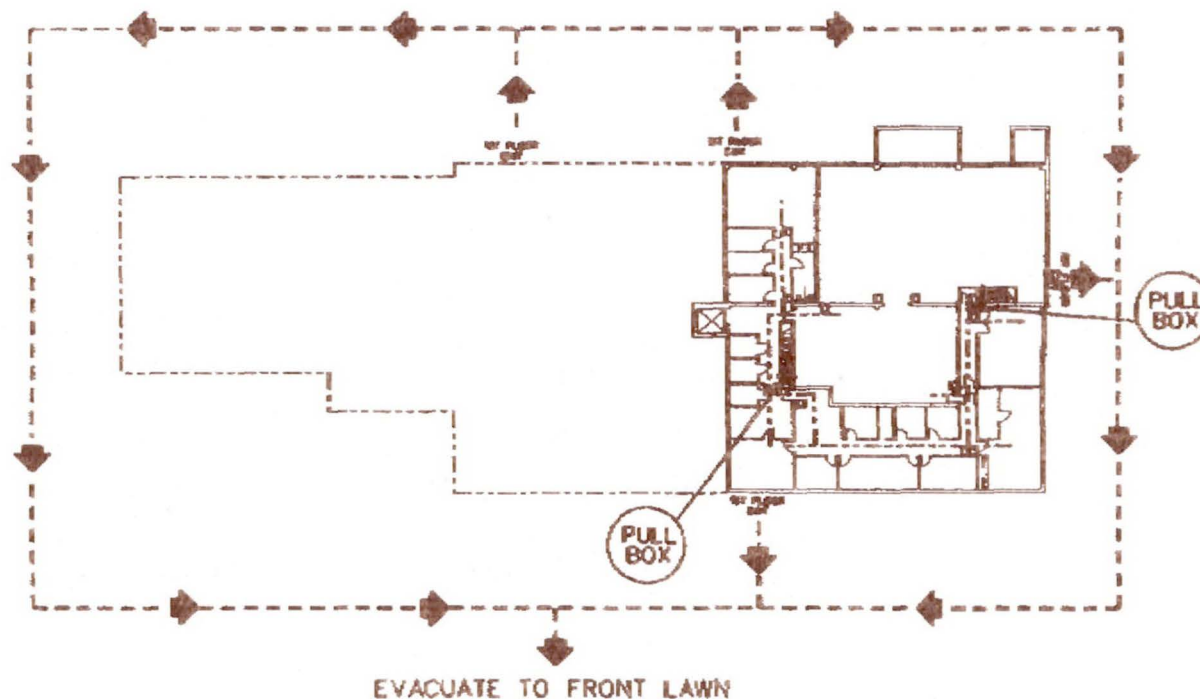
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RESOURCES BUILDING - BASEMENT



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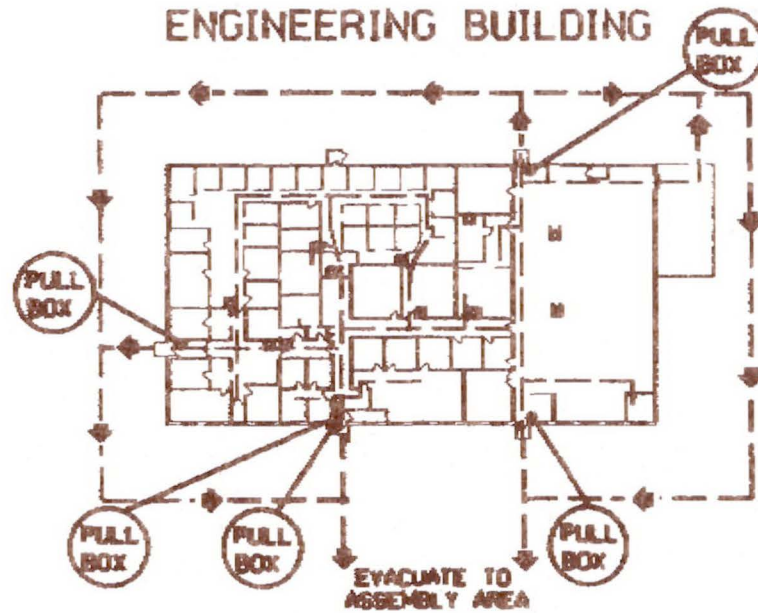
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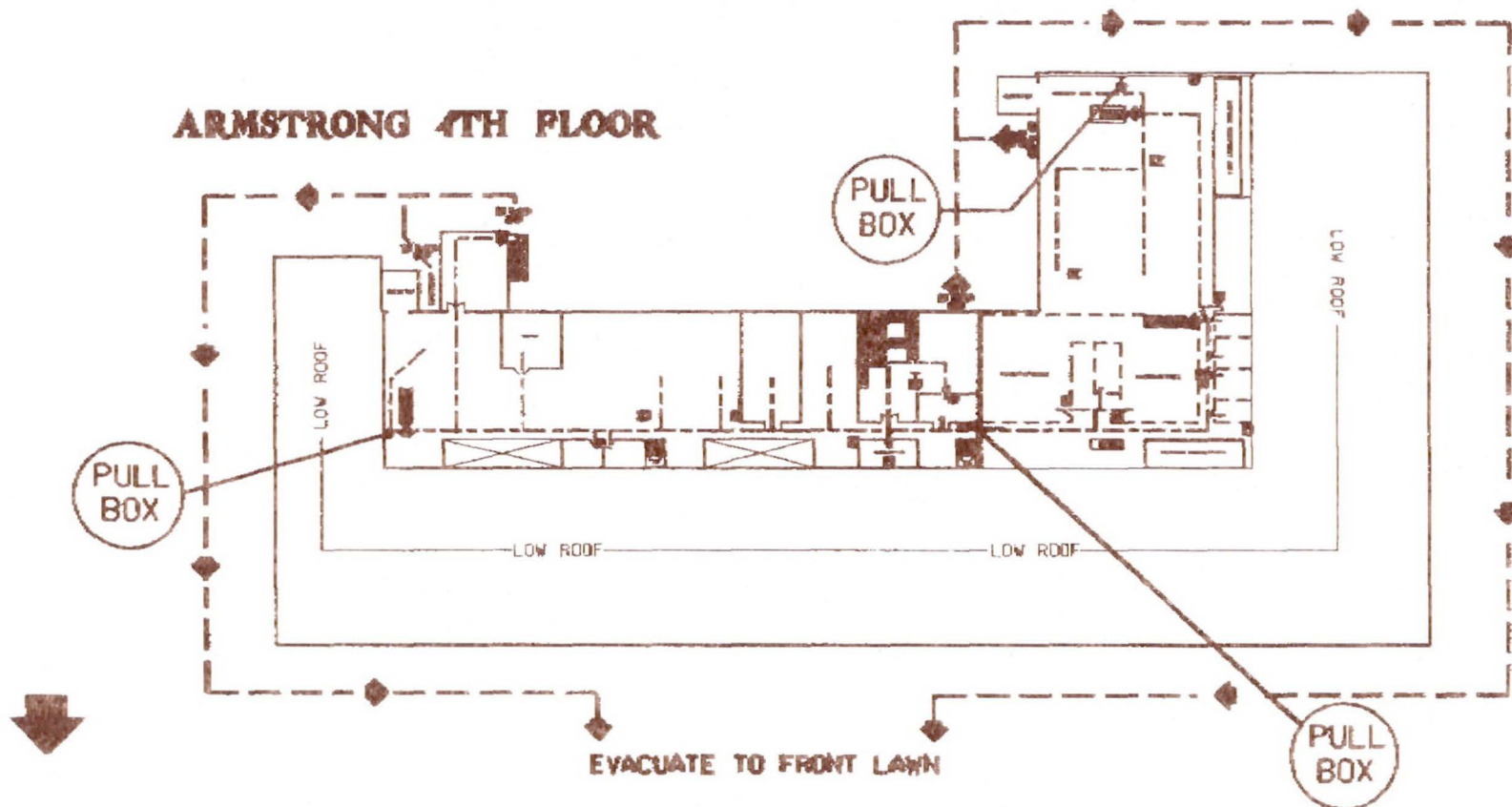
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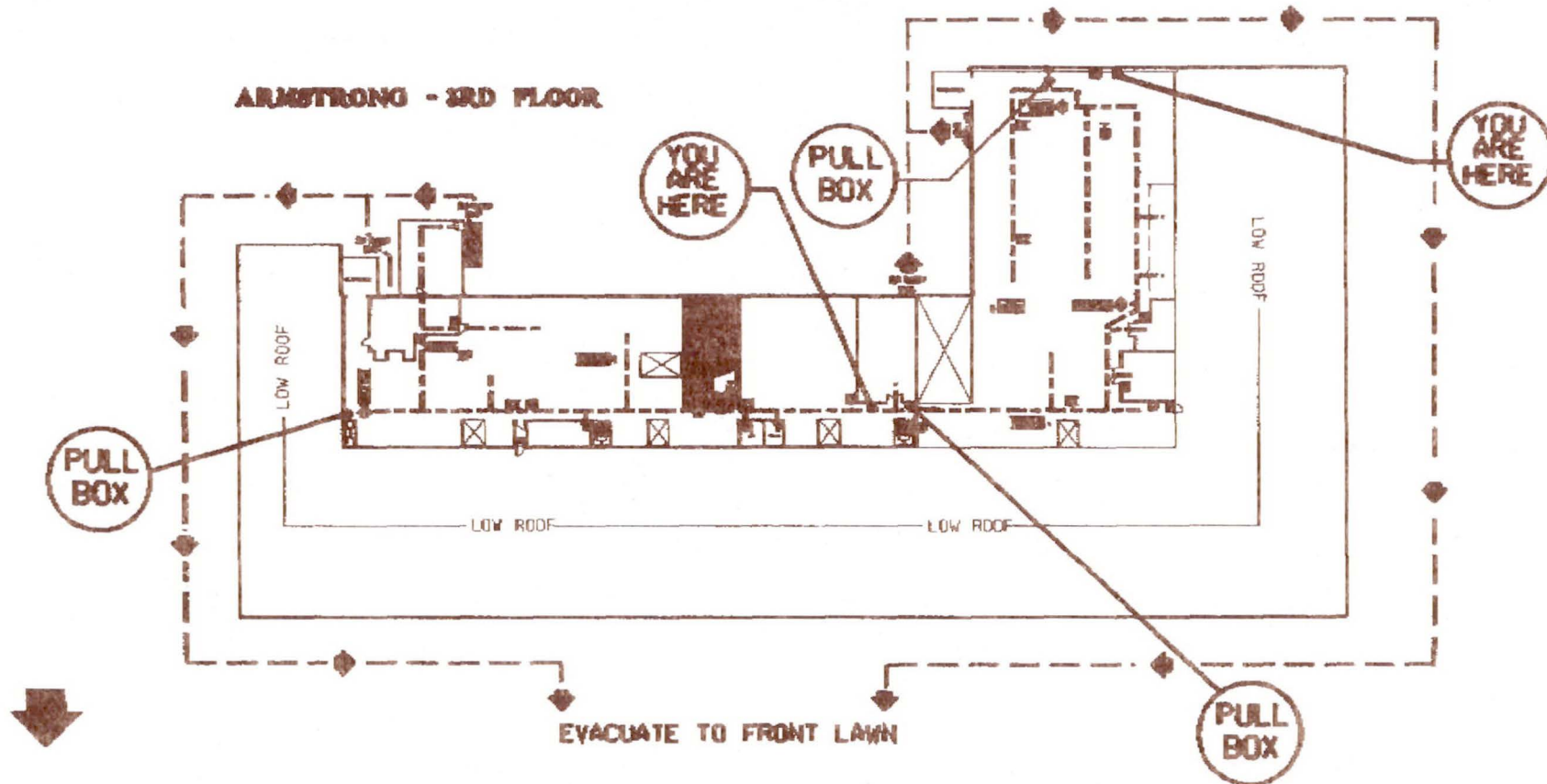
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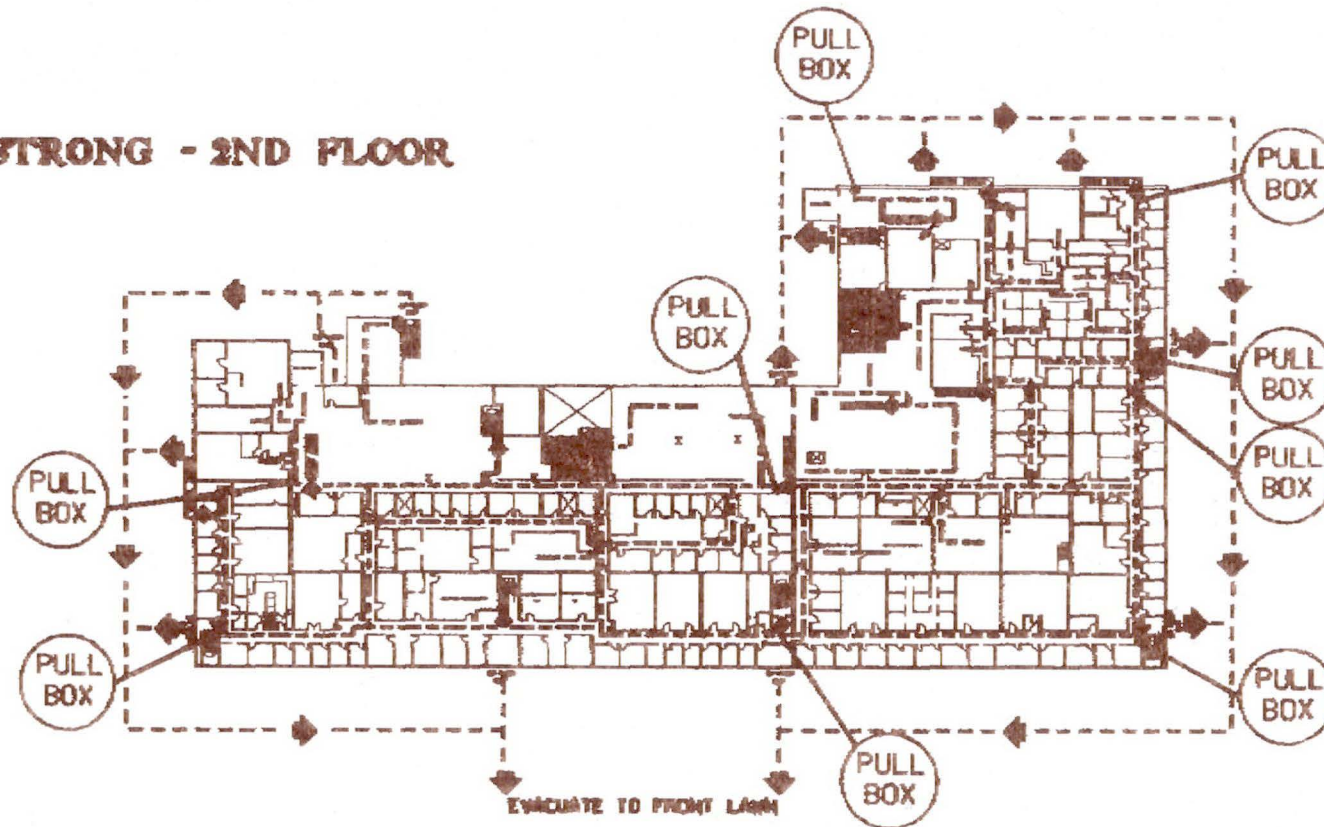
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□ DENOTES FIRE EXTINGUISHER

ARMSTRONG - 2ND FLOOR



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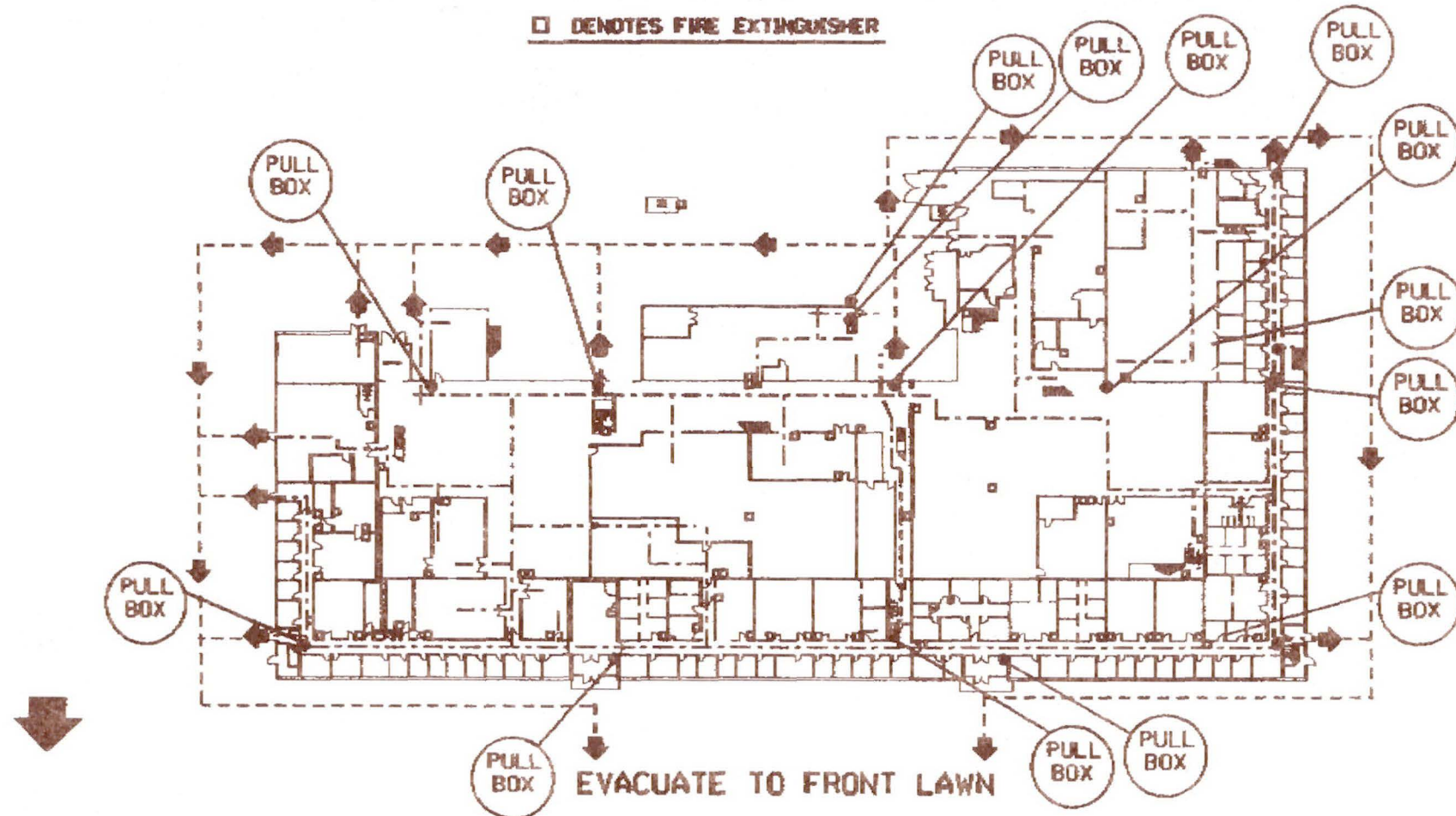
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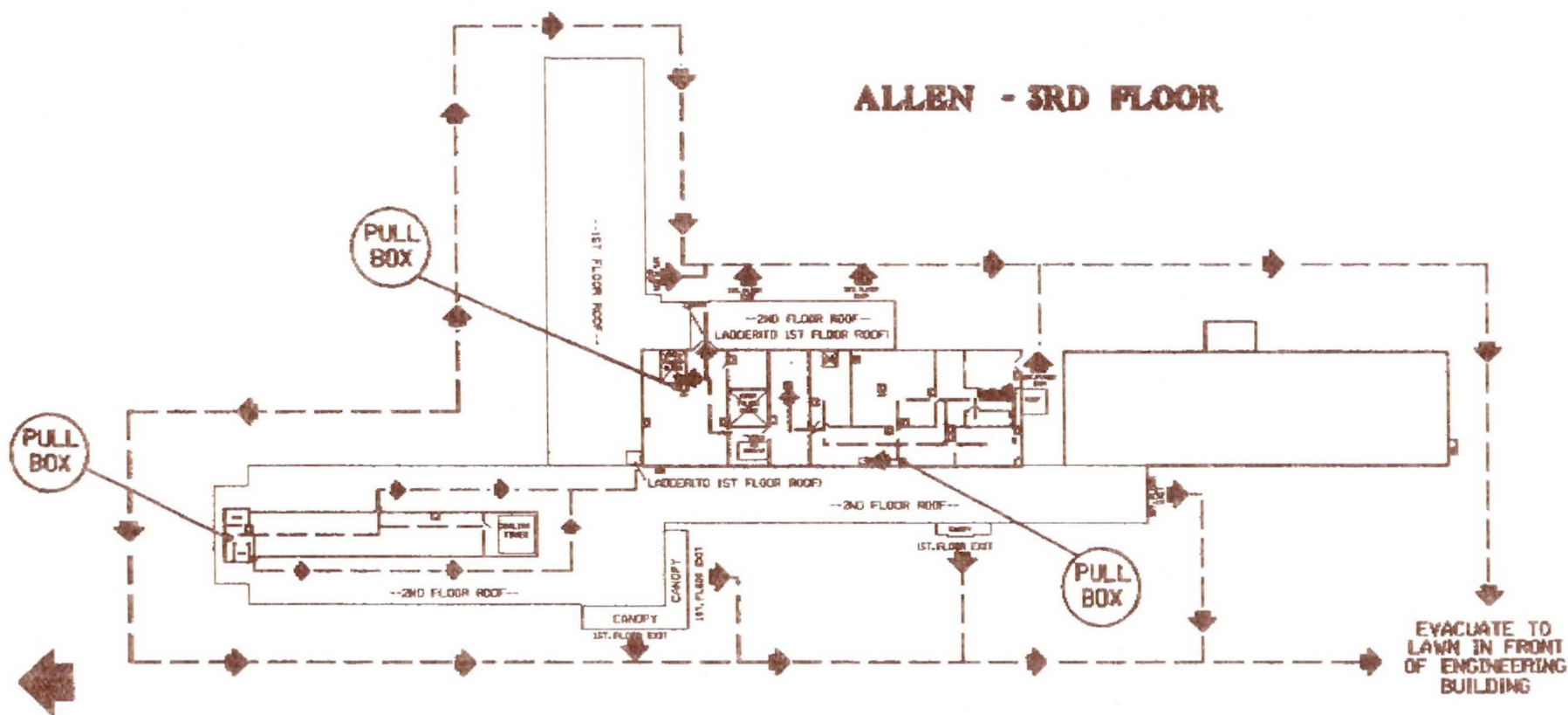
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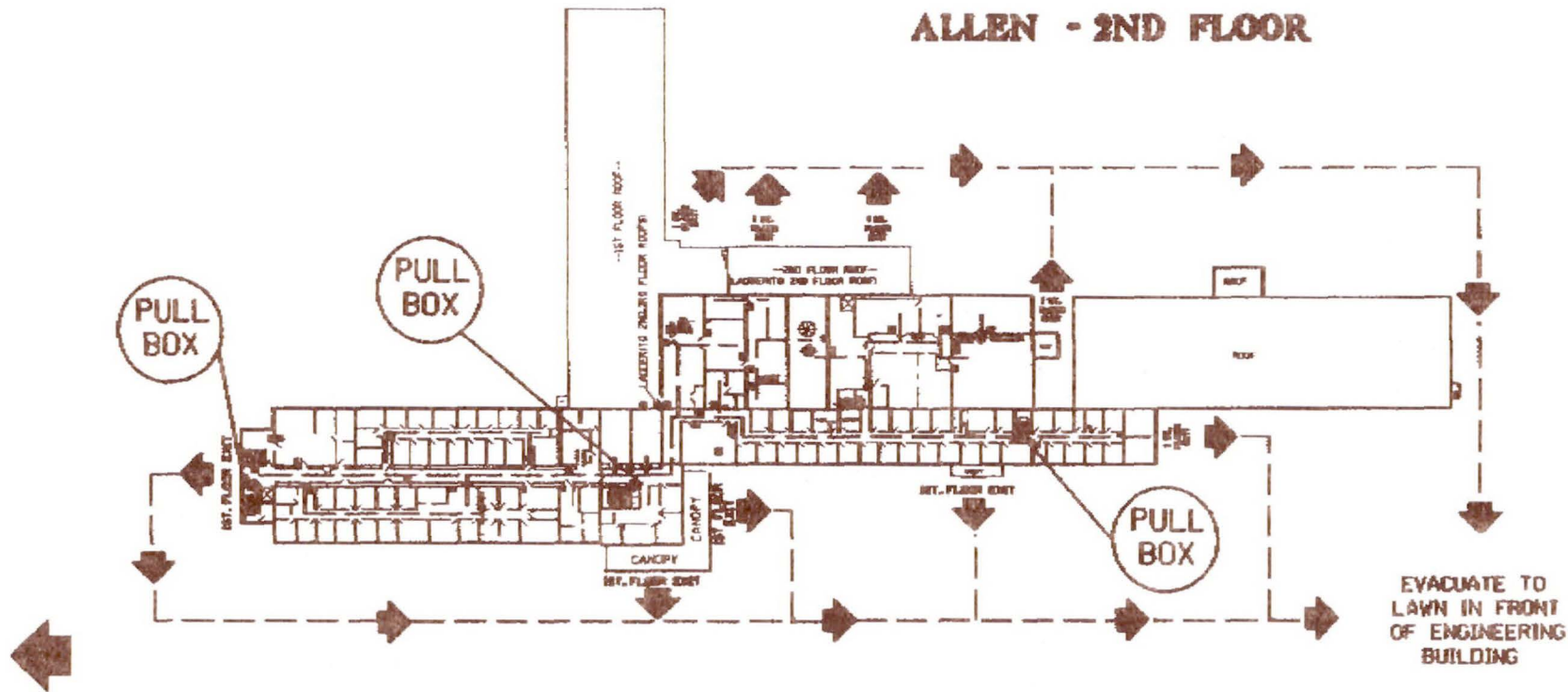
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☐ DENT'S FIRE EXTINGUISHER

ALLEN - 2ND FLOOR



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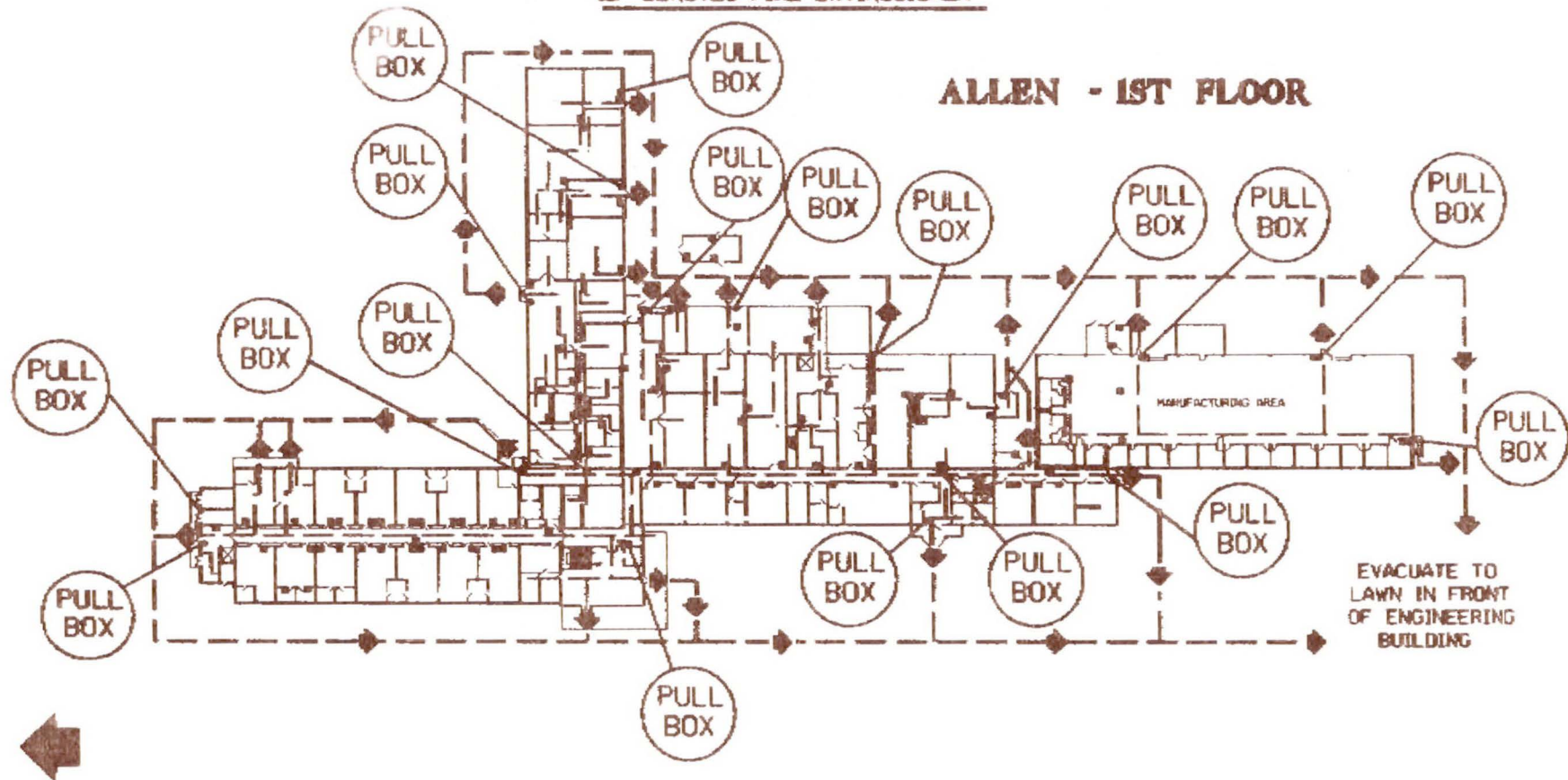
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FAX MESSAGE FORM

DATE: Aug. 28, 92

TO: MR. Jesse Wells

LOCATION: N.C. Dept. - Mooresville Office Solid & Haz. Waste

PHONE EXT: FAX # 663-6040

FROM: PEM CARTER

Phone #: 704 554-3020

Location: HOECHST CELANESE
CHARLOTTE, NC
DREYFUS RESEARCH PARK

FAX #: 704-554-3293

NUMBER OF PAGES INCLUDING COVER SHEET: 21

(DOCUMENT BEING FAXED)

letter:

NOTES:

Revised HAZMAT TEAM MEMBER
CERTIFICATION

Hoechst Celanese

Hoechst Celanese Corporation
PO Box 32414
Charlotte, NC 28232-6085
704 554 2000

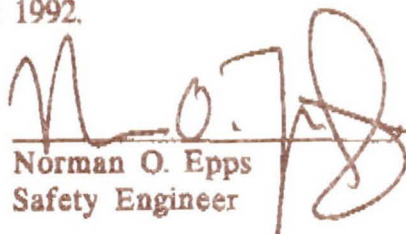
Dear Mr. Wells;

As requested, attached is the current HAZMAT Team Member listing for Hoechst Celanese-Dreyfus Research Park and each members certifications which will meet the requirements of annual training for Hazmat Team members. Note: this revised listing reflects the numerous retirements of individuals from the Hazmat and Emergency Fire Brigade.

Due to realignment of Hoechst Celanese-Dreyfus Research Park and numerous retirements, Emergency Coordinators: Principal and Alternates will be identified and receive training during Fourth Quarter: 1992.



PEM Carter
Environmental Engineer



Norman O. Epps
Safety Engineer

Attachment B

HAZMAT TEAM MEMBERS

First Responder Level (i.e. 8 hours training):

- Ron R. Ballard ✓ 5/18/92 - 2208
- C. Jack Feemster ✓ 5/18/92 - 3352
- R. Dick Jones ✓ - 2208
- John P. Barwick ✓ 5/18/92 - 3352

Hazardous Materials Technical/Specialists & Incident Commander Level (24 & 40 hours training):

- | | | | |
|------------------------|--------|------------------|--------|
| P.E.M. Carter ✓ | - 3020 | Norman O.Epps ✓ | - 3536 |
| C. Caldwell Cole ✓ | - 3836 | Ricky S. Smith ✓ | - 3211 |
| Bernard M. Jefferson ✓ | - 3796 | H. Ken Smith ✓ | - 3352 |
| George C. Camp ✓ | - 3352 | Leroy W. Zercher | - 3312 |
| Gil A. Insley ✓ | - 3895 | | |

These individuals also serve as the Fire Emergency Brigade Team:

- | | | | |
|-------------------|--------|------------------|--------|
| Dot M. Pack ✓ | - 3611 | S. Renee Meeks ✓ | - 3611 |
| Eric J. Penegar ✓ | - 3611 | | |

Emergency Fire Brigade Team:

- | | | | |
|-------------------|--------|------------------------|--------|
| George C. Camp ✓ | - 3352 | Eric J. Penegar ✓ | - 3611 |
| C. Caldwell Cole | - 3836 | H. Ken Smith ✓ | - 3352 |
| Harold E. Davis ✓ | - 3611 | Bob J. Whisnant | - 3611 |
| Dot M. Pack ✓ | - 3611 | L. W. Zercher ✓ | - 3112 |
| S. Renee Meeks ✓ | - 3611 | Bernard M. Jefferson ✓ | - 3796 |

Coy Wood

Revised: 8/28/92
 Approved: 
 Safety Engineer

L. A. Weaver Company

This certifies that

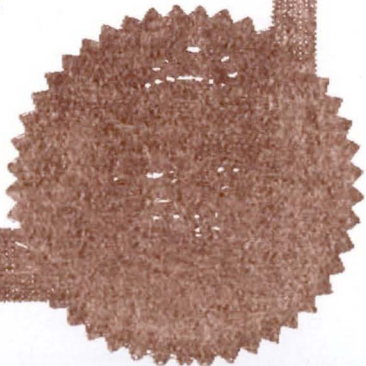
Caldwell Cole, Jr.

has satisfactorily completed an 8 hour course in
Hazardous Materials and Waste Training
on this 18th day of May, 1992

Charlotte, NC

Wendy Byrd

L.A. Weaver



L. A. Weaver Company

This certifies that

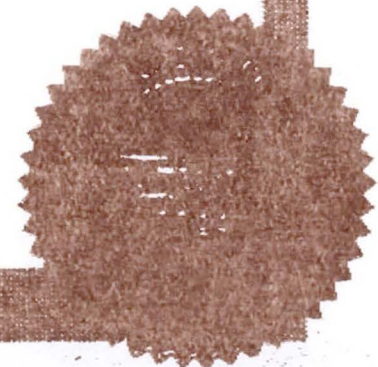
Ricky Smith

has satisfactorily completed an 8 hour course in
Hazardous Materials and Waste Training
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Charlotte, NC

Wendy Byrd

L.A. Weaver



L. A. Weaver Company

This certifies that

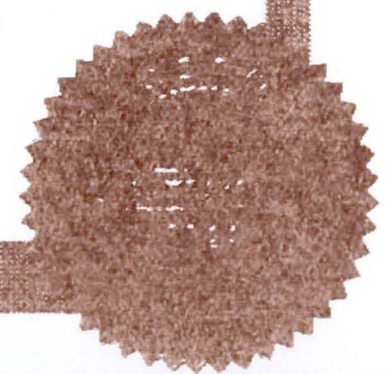
Pem Carter

has satisfactorily completed an 8 hour course in
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on this 18th day of May, 1992

Charlotte, NC

Wendy Byrd

J.A. Weaver



L. A. Weaver Company

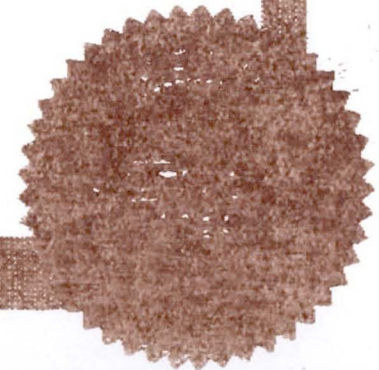
This certifies that

Gil Insley

has satisfactorily completed an 8 hour course in
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Charlotte, NC

Wendy Byrd
L.A. Weaver



L. A. Weaver Company

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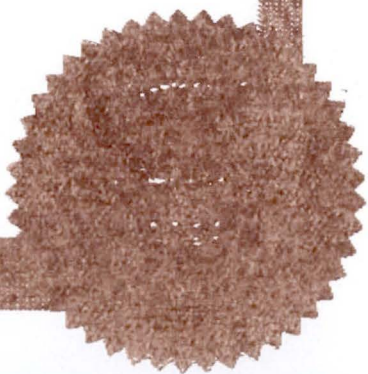
Dick Jones

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Charlotte, NC

Wendy Byrd

L.A. Weavers



L. A. Weaver Company

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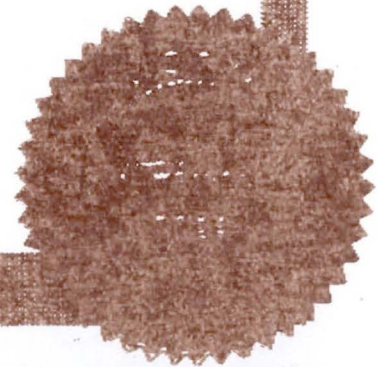
George T. Camp

has satisfactorily completed an 8 hour course in
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on this 18th day of May, 1992

Charlotte, NC

Wendy Byrd

L.A. Weaver



L. A. Weaver Company

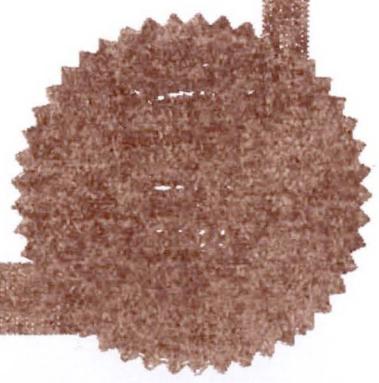
This certifies that

Dorothy Pack

has satisfactorily completed an 8 hour course in
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Charlotte, NC

Wendy Byrd
L.A. Weaver



L. A. Weaver Company

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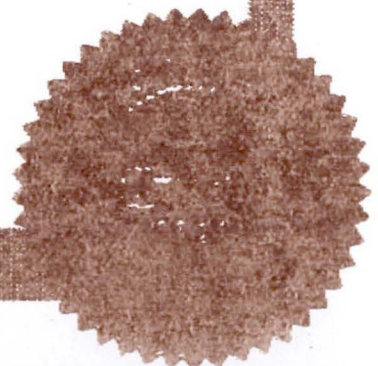
Rena Meeks

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L.A. Weaver



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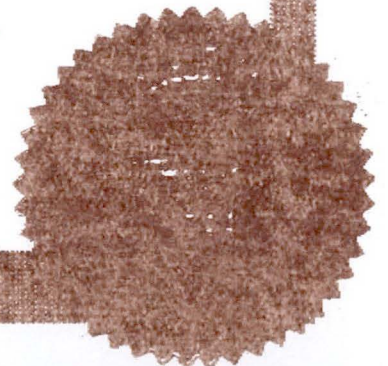
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L.A. Weaver



L. A. Weaver Company

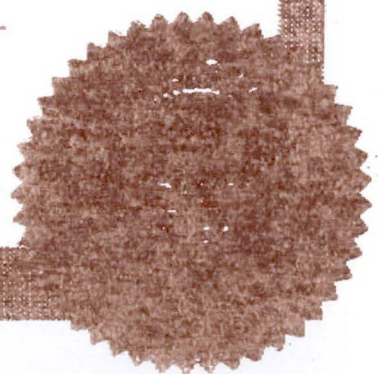
This certifies that

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L.A. Weaver



L. A. Weaver Company

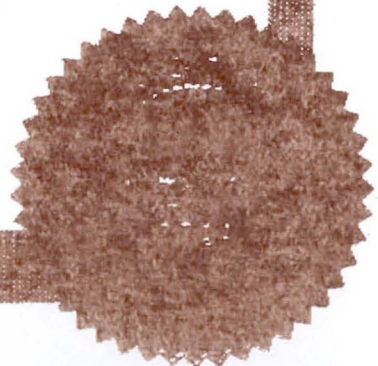
This certifies that

Harold E. Davis

has satisfactorily completed an 8 hour course in
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L.A. Weaver



L. A. Weaver Company

This certifies that

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Wendy Byrd

L.A. Weaver



L. A. Weaver Company

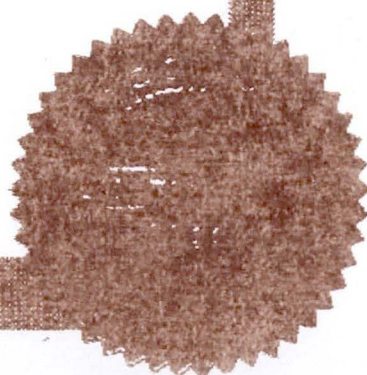
This certifies that

Jack Feemster

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Charlotte, NC

Wendy Byrd
L.A. Weaver



L. A. Weaver Company

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Coy Wood

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L.A. Weaver



L. A. Weaver Company

This certifies that

Eric J. Penegar

has satisfactorily completed an 8 hour course in

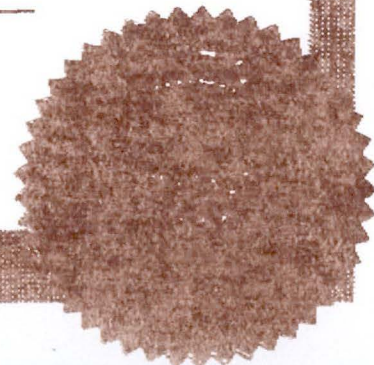
Hazardous Materials and Waste Training

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L.A. Weaver



L. A. Weaver Company

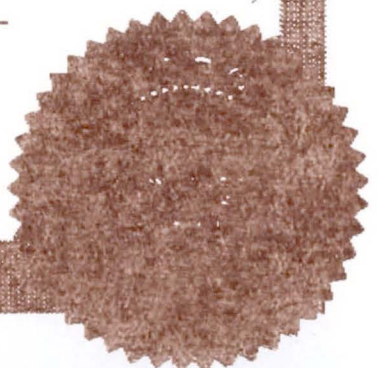
This certifies that

Bernard M. Jefferson

has satisfactorily completed an 8 hour course in
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Charlotte, NC

Wendy Byrd
L.A. Weaver



L. A. Weaver Company

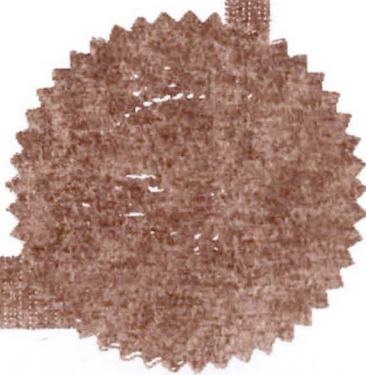
This certifies that

Leroy W. Zercher

has satisfactorily completed an 8 hour course in
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Charlotte, NC

Wendy Byrd
L.A. Weaver



L. A. Weaver Company

This certifies that

Norman Epps

has satisfactorily completed an 8 hour course in
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on this 18th day of May, 1992

Charlotte, NC

Wendy Byrd

L.A. Weaver



RCRA INSPECTION FIELD NOTES

C = copies made; * = violation; P = photos

Facility name: Hoechst Celanese

Address: 2300 Archdale Dr.

ID number: 000608117

Date: 8/26/92 Last inspection: 9/17/91

Type of inspection: CEI

Contact: PEM Carter

Present at Inspection: _____

Waste Generated: FO03(Acetone) FO04(orthochlorophenol) D001(Nicotine)
Ethylene Glycol D002(Acetic Acid) FO03(ethyl alcohol, propanol) FO03(ACETONE TOL)
U003, U196, D038
waste chemicals

Transporters: Env. Transfer Corp NJD 991 291 584
Nappi Trucking NJD 000 813 477 (NR)

TSD's: Recycle Hoechst Cel. Cel River. Pft. SCD 003159928
Advanced Env. Tech. NCD 986 166 338 D001, FO04
Marisol, Inc. NJD 002 454 544
Reinfase.

Manifests: _____

Signed copies: _____

Treatment Standards: _____

Inspection Records: O.K weekly insp. log O.K.

Contingency Plan: Evacuation plans (posted) (Recommendations addressed)

- actions for spill/fire: O.K.
- agreements with emergency management: ✓ HOS.
- name, address, phone for em coords: _____
- emergency equip/location/alarms: _____
- evacuation plan/signals/primary/secondary: _____
- em coords updated? _____
- reports on use of conting plan? _____

Training Records: May 18, 1992 =
Waste Handlers

Training Documentation Locked up.

Last training: _____

✓ Job Title: _____

✓ Job description: _____

✓ Content: _____

✓ Sign-off: _____

✓ em coords and appropriate personnel trained? _____

waste acetone R & D Pilot Pft.
Cellulose are

Annual Report: 2/26/92 -

Waste Analysis: _____

Accumulation areas: (3) satellite areas.

Storage Area: _____

Notes: _____

Acetic Acid D002 Recycled?

D001 U003 F003 U196 D088 F002 F005 U122 F004 D002
U151 U201 D005 F D022 D023

U226 - 111 Trichloroethylene — Manifest 00333
264.

U201 Resorcinol } Lab Packs
U003 - Acetonitrile }
U122 - Formaldehyde }
U151 - Mercury }

Lab Satellite Areas

~~Armstrong~~

- ① Armstrong ✓
- ② Stoll ✓
- ③ Allen ✓

20 drums
14
34 drum acetate
Dated & labeled

- ④ Cellulose ✓ 90 days storage pod. Recycle Storage Variator
- ⑤ CP/Auto Clase. Ethylen Glycol / Spent Dow Therm N-Haz.

90 day RCRA Pad

6/7/91
October 1992

Retired & Realignment

* Ron Foltz ✓ Nick Bender ✓
A.H. Rich Samur ✓ John Salligahin ✓
G.J. Johnson ✓ Ron Baillij ✓
R.E. Caldwell 10/91 O.K.

24 hour Train
On-Site Comm { Lab Packs
Ron Caldwell } 45 Hazardous
George Bullister } Waste
Pete Carter ✓
Nicky Smith ✓
Bernard Jefferson ✓
Ken Smith ✓

Date: 6-4-92

Primarily Generators/

Subject: RCRA, Hazardous, B31, Recycling

Dept. No./Name 2523 Building Steward Group - Maintenance

ATTENDEES

NAME

Title

NAME	Title
Jim Lindsey	Building Steward
Charles Plakwood	Maint.
Martin L. Egid	Maint
Troy W Zacher	Maint
Jim Lusk	MAINT.
Steve Cook	maint
O.K. Spence	Building Maint.
Ray Stegall	Training Coordinator
Danna Crump	Space Coordinator
Brayland Lowry	Design Coordinator

Individual responsible for waste oils - chemicals used in roofing & repairs of building - Small generator

Trainer: Tom Carter June 4, 92

- 1. RCRA
- 2. Waste Water
- 3. BFI - Trash
- 4. Recycle

SIGN-UP SHEET

Date: June 17, 1992

Trainer: PEM Carter

PEM Carter

DEPT. NAME : Operation testing lab (i.e. Tech or Eng.)

Printed Name	Title	Signature
1. <u>Geraldine O. Williams</u>	<u>Superv.</u>	<u>Geraldine Williams</u>
2. <u>Linda Donaldson</u>	<u>Tech</u>	<u>Linda Donaldson</u>
3. <u>Keith Smith</u>	<u>Tech</u>	<u>Keith Smith</u>
4. <u>Carol Holcomb</u>	<u>.</u>	<u>Carol Holcomb</u>
5. <u>Karen Broome</u>	<u>Tech</u>	<u>Karen Broome</u>
6. <u>Linda C. Wood</u>	<u>Tech</u>	<u>Linda Wood</u>
7. <u>Paula Harris</u>	<u>"</u>	<u>Paula Harris</u>
8. <u>Eddie Faile</u>	<u>"</u>	<u>Charles E. Faile Jr.</u>
9. <u>George H. Alexander</u>	<u>Jr</u>	<u>G.H. Williams</u>
10. <u>David Insdale</u>		<u>David Insdale</u>
11. <u>Rechon White</u>	<u>→ ←</u>	<u>Rechon White</u>
12. <u>Johnny White</u>		<u>Johnny White</u>
13. <u>DELORIS JUDGE</u>	<u>Tech Spec.</u>	<u>Deloris A. Judge</u>
14. <u>JUNE BIGHAM</u>	<u>Tech.</u>	<u>June Bigham</u>
15. <u>DON LANEY</u>	<u>TECH</u>	<u>Don Laney</u>
16. _____		
17. _____		
18. _____		
19. _____		
20. _____		
21. _____		
22. _____		
23. _____		
24. _____		
25. _____		

RETAIN THIS ROSTER AS A RECORD OF ATTENDANCE AT THIS TRAINING SESSION.

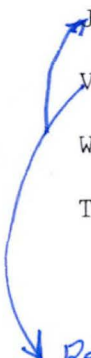
Hazardous Waste Handlers

Name	Job Title	Haz. Waste handling tasks
Willie Parks	WHSE - Forklift	Hauling waste from satellite pad to Waste Storage Pad
Janet Davis	ISS Janitorial	Hauling waste from satellite pad to Waste Storage Pad
Virginia D. Hamrick	Pkg. Delivery	Hauling waste from satellite pad to Waste Storage Pad
Willie Baxter	Pkg. Delivery	Hauling waste from satellite pad to Waste Storage Pad
Ted Linsay	WHSE Supv.	Hauling waste from satellite pad to Waste Storage Pad

10/29/91

10/29/91

10/29/91
6/2/92



Resource Bldg. => no longer handle haz. waste as of Oct. 1991

Waste Handlers

James Garnett 6/2/92

Moses Howell = 6/2/92

~~Ken~~* Ken Creek - 6/2/92

Proctor Rodney - 6/2/92

Ted Li

Operatives

FAX MESSAGE FORM

DATE: SEPTEMBER 23, 1992

TO: Jesse Wells

LOCATION: N.C. Department - Mooresville Office - Solid & Heavy Waste

PHONE EXT: FAX # 663-6040

FROM: PEM CARTER

Phone #: 704 554-3020

Location: HOECHST CELANESE
CHARLOTTE, NC
DREYFUS RESEARCH PARK

FAX #: 704-554-3293

NUMBER OF PAGES INCLUDING COVER SHEET:

(DOCUMENT BEING FAXED)

NOTES:

letter:

list of Emergency Coordinators and documented training and contact.

Hoechst Celanese

Hoechst Celanese Corporation
PO Box 32414
Charlotte, NC 28232 6085
704 554 2000

September 22, 1992

Dear Mr. Wells;

Subject: **Hoechst Celanese Corp.- Dreyfus Research Park
2300 Archdale Drive, Charlotte, N.C.
EPA ID# NCD 000 608 117**

As required prior to October 3, 1992:

262.34(a)(4) ref. 265.16(c) Annual review of training not documented for emergency coordinators.

Attached is a copy of the documentation and the content of their training. This should meet the first specific outlined on the Notice of Violation.

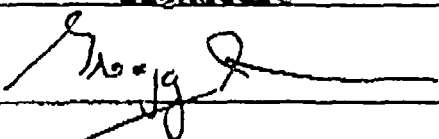

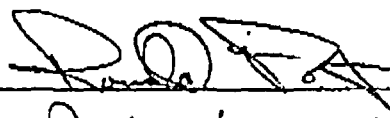
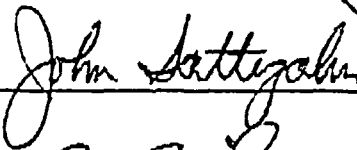


Sincerely, *PEM Carter*


PEM Carter
Env. Engineer

EMERGENCY COORDINATOR TRAINING

DATE: September 22, 1992

Training Log:

<u>Name (PRINT)</u>	<u>Signature</u>	<u>Title</u>
Gregory Johnson		Research Director
RICHARD SUMNER		Service Mgr.
RONALD FOLTZ		Research Director
JOHN SATTIZAHN		Section Leader
RON BAILEY		SECTION LEADER
Ron Caldwell		EH'S Supt.


Instructor

AGENDA**EMERGENCY PREPAREDNESS TRAINING**

- I. PURPOSE AND REQUIREMENTS OF PLAN
- II. EMERGENCY COORDINATORS DUTIES
- III. ROLES & RESPONSIBILITIES OF RESPONDERS
- IV. IMPLEMENTATION OF PLAN
- V. EMERGENCY RESPONSE - ON-SITE EVENT
- VI. EMERGENCY RESPONSE - OFF-SITE EVENT
- VII. CONTAINMENT & CONTROL MEASURERS
- VIII. FOLLOW-UP ACTIONS
- IX. EMERGENCY EQUIPMENT
- X. COORDINATION AGREEMENTS
- XI. WEEK-END DUTY OF EMERGENCY COORDINATORS

SLIDE 1

I. PURPOSE AND REQUIREMENTS TO PLAN

- BLUE BOOK - COMMITMENT TO EH&S PROTECTION
- REGULATORY REQUIREMENTS
 - RCRA
 - CERCLA (SUPERFUND)
 - SPCC
 - SARA
 - ETC.

II. EMERGENCY COORDINATORS & THEIR DUTIES [PAGE 1 - 3]

- FAMILIARITY WITH:
 - PLAN
 - SITE ACTIVITIES AND OPERATIONS
 - GENERAL KNOWLEDGE OF HAZARD MATERIALS AT THE SITE
 - FACILITY LAYOUT
 - RECORDS LOCATIONS
- COMMITTING RESOURCES TO CARRY OUT PLAN
- ASSESSING POSSIBLE HAZARDS TO HEALTH & ENVIRONMENT
- AUTHORIZING APPROPRIATE RESPONSE ACTION FOR HEALTH & ENVIRONMENT PROTECTION
- DIRECTING COMMUNICATIONS (INTERNAL & EXTERNAL)

SLIDE 2

III. ROLES & RESPONSIBILITIES OF RESPONDERS [PAGES 3 - 7]

- ON-SITE INCIDENT COMMANDERS (OIC) [PAGES 3 - 5]
- HAZMAT TEAM [PAGES 5 - 6]
- EMERGENCY BRIGADE [PAGE 6]
- SKILLED SUPPORT PERSONNEL [PAGE 6]
- HAZARDOUS WASTE HANDLERS [PAGE 6]
- SECURITY

IV. IMPLEMENTATION OF PLAN [PAGE 7]

- CONDITIONS THAT MUST EXIST FOR AN "EMERGENCY RESPONSE"
- EXAMPLES OF POSSIBLE "EMERGENCY RESPONSE SITUATIONS"

SLIDE 2A

TWO CONDITIONS MUST EXIST TO CONSTITUTE AN "EMERGENCY RESPONSE"

1. THE NATURE OF THE RELEASED MATERIAL AND ITS AMOUNT OR CONDITION TRULY POSES A SIGNIFICANT HAZARD TO HUMAN LIFE OR THE ENVIRONMENT.
2. CONTROL OF THE RELEASE REQUIRES A COORDINATED RESPONSE FROM OUTSIDE THE RELEASE AREA.

EXAMPLES OF POSSIBLE EMERGENCY RESPONSE SITUATIONS

- ON-SITE SPILLAGE OF HAZARDOUS CHEMICALS IN SIGNIFICANT QUANTITIES (RQ)
- OFF-SITE SPILLAGE OF HCC DRP HAZARDOUS SUBSTANCES
- A SIGNIFICANT VAPOR RELEASE OF DOWTHERM
- NATURAL GAS RELEASE
- ON-SITE FIRE/EXPLOSION INVOLVING HAZARDOUS SUBSTANCES
- SITUATIONS OF IDLH (IMMEDIATE DANGER TO LIFE & HEALTH) - TOXICITY, OXYGEN DISPLACEMENT, SIGNIFICANT OVER-EXPOSURE, ETC.

SLIDE 3

- V. EMERGENCY RESPONSE - ON-SITE EVENT [PAGES 8 - 12]
 - A. INITIATION OF SITE INCIDENT NOTIFICATION [PAGE 8]
 - B. EMPLOYEE SAFETY/EVACUATION [PAGE 9]
 - C. EMERGENCY RESPONSE SEQUENCE [PAGES 9 - 12]
 - FIRST RESPONDERS
 - SECURITY
 - MAINTENANCE AND UTILITY PERSONNEL
 - ON-SITE INCIDENT COMMANDERS
 - D. EMERGENCY COORDINATORS
 - BASE LOCATION(S) [PAGE 11]
 - RISK ASSESSMENT [PAGE 12]
 - NOTIFICATIONS/REPORTING
 - INTERNAL [PAGE 14]
 - EXTERNAL [PAGE 16]

SLIDE 4

VI. EMERGENCY RESPONSE - OFF-SITE EVENT [PAGE 12]

- EXAMPLES
- INVOLVEMENT
- NOTIFICATION/REPORTING

VII. CONTAINMENT AND CONTROL MEASURES [PAGE 13]

- EXAMPLES

VIII. FOLLOW-UP ACTIONS [PAGES 17 - 19]

- CLEAN-UP OPERATIONS
- PLAN REVISION
- WRITTEN REPORTS

IX. EMERGENCY EQUIPMENT [PAGES 19 - 21]

X. COORDINATION AGREEMENTS [PAGES 22 - 23]

XI. INDEX CONTENT

SCENARIO:

On Thursday, at 1:12PM, an explosion occurs while an acetone tanker is unloading product at the acetone tank farm located behind the Allen Building. A violent fire results, with subsequent explosions; most of the windows in Allen are shattered, with a few windows shattered in Stoll, Engineering, and Resource buildings. An HCC employee, assisting in the acetone unloading, and the truck driver are presumed dead. Four contract personnel and another HCC employee were nearby when the explosion occurred and are also injured (extent unknown). At 1:13PM, an Allen building employee calls the 3330 number and reports the emergency; Security announces the evacuation command of Allen Building and calls 911. 1:14PM; the Emergency Brigade (11 people) is on the scene and evacuation of the Allen Building has begun.

At 1:19PM, a member of the EH&S Dept. has informed the Emergency Coordinator of the above details.

The City Fire/Hazmat team arrives at the site at 1:20PM and takes control. EH&S, Brigade, and knowledgeable acetate pilot plant personnel are working with the Fire Chief in providing relevant details. The Fire Department begins combating the fire at 1:25PM and sets-up their incident command center. Winds are out of the south east, blowing towards the Allen Building, and the fire is out of control at this time.

You are the Emergency Coordinator, what are your actions???

Emergency Coordinator's Checklist of Actions

1. Establish contact with the On-Scene-Incident-Commander.
2. Obtain two-way radio unit from Guard Station.
3. Appoint couriers to provide assistance in handling the emergency communications.
4. Evaluate the situation and circumstances surrounding the incident, and get the facts.
5. Ensure appropriate responses are taken to control the incident, and direct actions as necessary for the protection of human life and the environment.
6. Establish your base location and report to Security where you are located and how you may be reached.
7. Initiate evacuation responses as necessary (on and off-site).
8. Determine any additional resources that may be needed to control the immediate situation.
9. Write down the facts (number injured, type of incident, time of incident, circumstances, & other pertinent information).
10. Notify appropriate site, Company, and Corporate officials and personnel.
11. Direct the notification of appropriate local, State, and Federal agencies.
12. Contact Communication and Public Affairs Coordinator and begin preparing press announcement.
13. Direct the notification of appropriate elected officials.
14. Designate a principle spokesperson and notify Security and switchboard operator of this person.
15. Direct Media conference location and arrangements.
16. Advise the community members of the Community Advisory Panel of the emergency incident.
17. Continue to monitor the situation from a centralized location.
18. As appropriate, set-up an employee information phone line for those that may be calling-in.

Hazmat Team Members

First Responder Level (i.e. 8 hours training):

Joe A. Adkins <i>(Retired)</i>	3352	John P. Barwick ✓	- 3352
Ron R. Ballard	- 2208	Jim L. Mesimer	- 3352
Richard W. Brown	- 3352	Duane A. Peak	- 3352
C. Jack Feemster ✓	- 3352	R. J. Miller	- 3352
R. Dick Jones ✓	- 2208		

Hazardous Materials Technical/Specialists & Incident Commander Level (24 & 40 hours training):

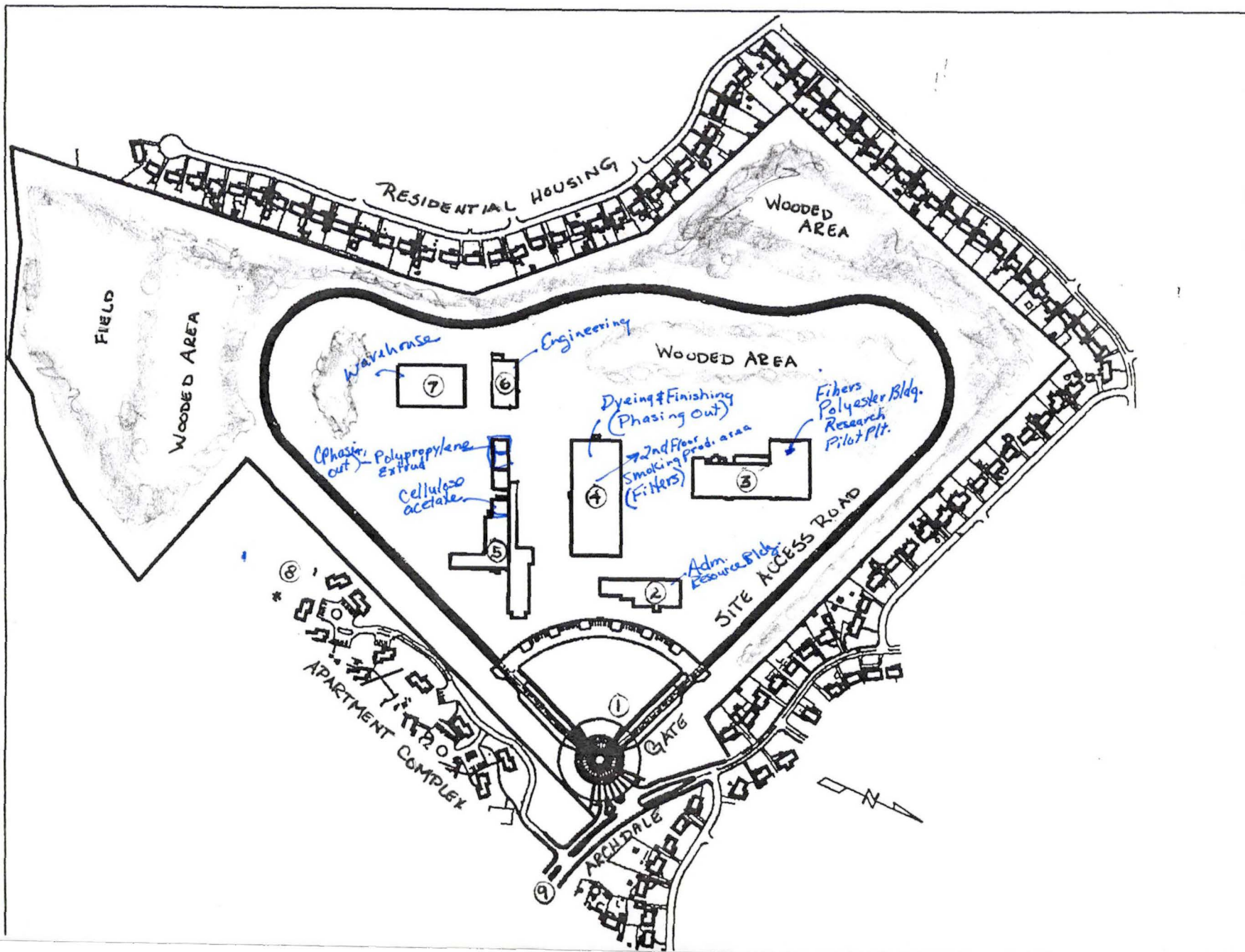
Ron E. Caldwell <i>10/91</i>	- 3510	George C. Bullard <i>Ret</i>	- 3536
P.E.M. Carter ✓	- 3020	Ricky S. Smith	- 3211
C. Caldwell Cole ✓	- 3836	Harold E. Davis ✓	- 3611
Bernard M. Jefferson ✓	3796	H. Ken Smith	- 3352
John F. Tatham	- 3107	Leroy W. Zercher	- 3112
George C. Camp ✓	- 3352		

Gil Insley
N

*Emer. Coord 6/7/91 **

Emergency Brigade Team

George C. Camp ✓	- 3352	Eric J. Penegar ✓	- 3611
J. Mike Cochran	- 3611	Eldrin G. Reynolds	- 3611
C. Caldwell Cole ✓	- 3836	H. Ken Smith ✓	- 3352
Harold E. Davis ✓	- 3611	John F. Tatham	- 3107
C. Randy Howle	- 3610	Bob J. Whisnant ✓	- 3611
Lillian F. McNeil	- 3506	L. W. Zercher ✓	- 3112
Dot M. Pack ✓	- 3611	Bernard M. Jefferson ✓	3796
S. Renee Meeks ✓	- 3611		



EPA ID: NCD000608117

Submitted by: _____ Date: _____

Entered by: _____ Date: _____

Facility Name: Hoechst - CELANESG - Preyfus Pco. City: Charlotte

EVALUATION DATA: New: Change: Delete: (: Required)

Agency: 5 Date: Mo. 9 / Day 17 / Year 97

Type: CEI

Control Number Data Entry Personnel

Person: 061 Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators	
GER	<input checked="" type="checkbox"/>
GGR	<input type="checkbox"/>
GLB	<input type="checkbox"/>
GSQ	<input type="checkbox"/>
GMR	<input type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input type="checkbox"/>
GRR	<input type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters	
TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's					
DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
DIN	<input type="checkbox"/>	DOT	<input type="checkbox"/>		

Compliance Schedule (TSD, Gen., Trans.)
FEA CAS

Evaluation Comments:
(72) 1 :

no violations noted at time of inspection

2 :

VIOLATION DATA: New: Change: Delete:

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Agency: Type: Date (mdy) Determined: / / Class:

Priority: Branch: Person: Seq. Number (Data Entry)

Return to Compliance: / / -- Scheduled -- / / -- Actual --

Reg. Type: Reg. Description (30): _____

Comment (72): _____

Continue violation data on Side B if necessary -

RCRA INSPECTION REPORT

1) Facility Information

HOECHST CELANESE - PREYFUS RESEARCH PARK
2300 ARCHDALE DR
CHARLOTTE NC 28210
NCD 000 608 117

2) Facility Contact

P.E.M. CARTER

3) Survey Participants

PEM Carter Spring Allen
Ron Caldwell

4) Date of Inspection

9-16-91 and 9-17-91

6) Purpose of Survey

Records Review and Facility inspection to determine compliance with 40CFR 262

7) Facility Description

Hoechst Celanese is a research park, operating approximately 75 onsite research laboratories. Efforts are under way to consolidate labs as is possible. Analysis are performed for each of the 7 manufacturing facilities operated by Hoechst Celanese. The site has 5 satellite accumulation areas follows: ① Armstrong Building, ② CP Autoclave waste ③ Stall Bldg ④ Allen Bldg, ⑤ Robotics Lab. and 2 1/2 today storage areas ① Cel River F003 for Receipt and the ② main storage pad. F003 (CEL RIVER) is waste acetone containing material which is shipped under a HW manifest to the Celanese CEL RIVER Facility where it is distilled and used as product without storage at the Cel River site. Arrangements are made prior to shipment as to allow for immediate entry into the distillation process. HW labels are removed at Cel River in accordance with a SC DHEC variance granted via 11-19-84 letter. 64 drums are in storage at the time of inspection, and 9 satellite accumulation drums are in process of being filled. Each Building operates a satellite accumulation area. Waste is collected in jugs and is brought to a centralized collection area. Each area holds a drum for waste flammable, a drum for waste halogenated materials and the Allen building additionally operates a satellite drum for waste caustics. Waste streams are, in general, lab packs and are handled by a advanced ENVIRONMENTAL TECHNOLOG. CORP. NCD 986 166 338 ^{Transporter} 154 -

Environmental Transfer Corp. NJD 991 292 584. where they are depacked and bulked and shipped to Merisol for fuels blending or to other TSD's for treatment also. To HES Charlotte for fuels blending (drummed waste only)

11) Waste Minimization

Facility is in process of consolidating labs as possible.

Non TSCA finish oils are shipped as non regulated material to HES

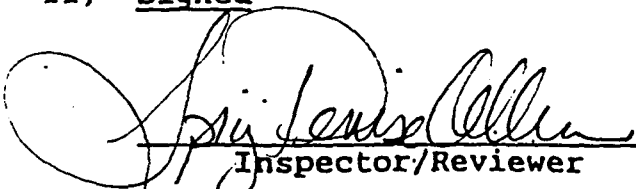
TSCA Regulated oils are discharged to CMUD under a discharge permit. also in process of Retrofit actions for PCB transformers. shipped to ROLLINS TXD 055 141 378.


*NOTE - 9) Site Deficiencies

no violations noted at the time of inspection

10) Recommendations

11) Signed

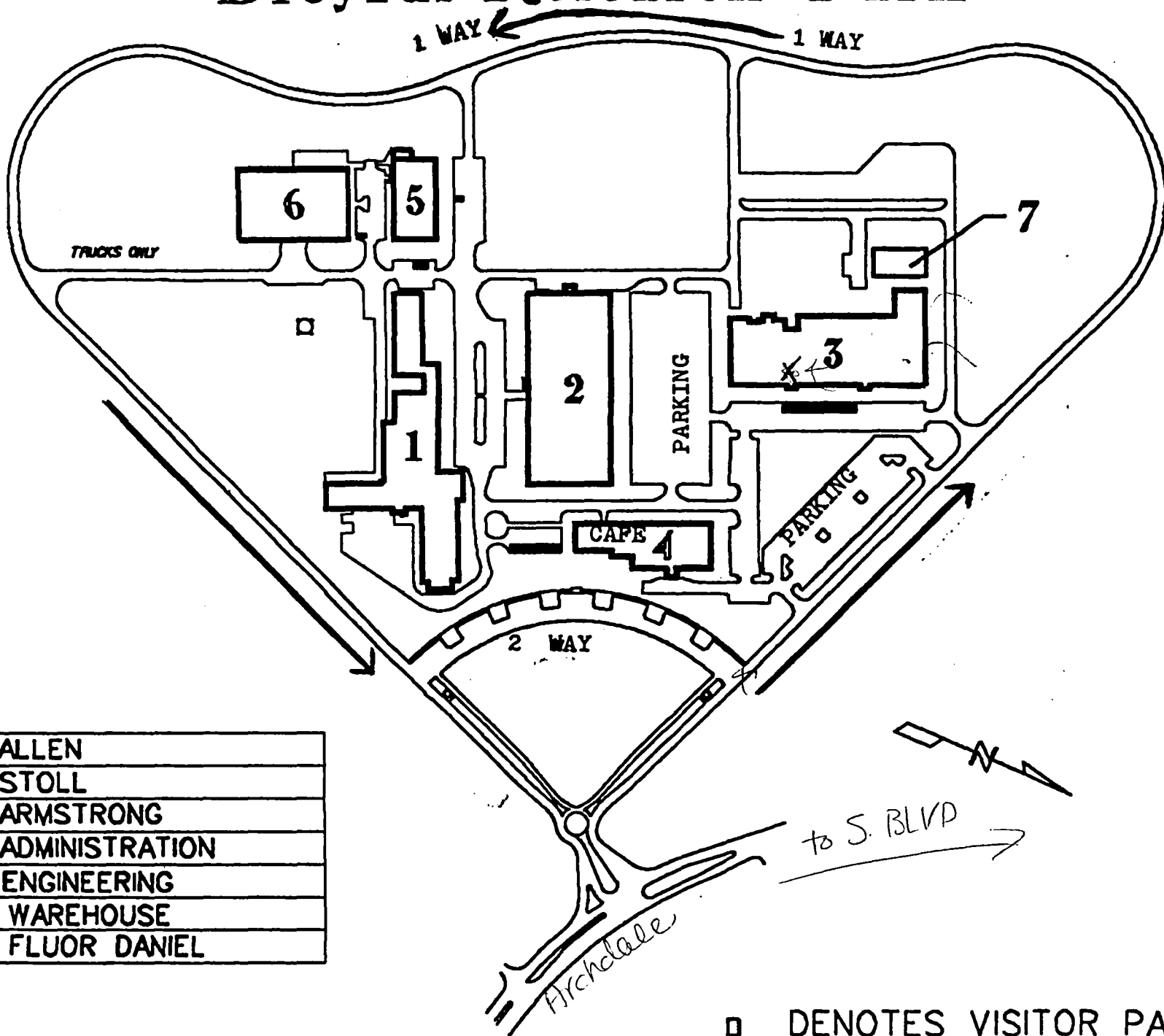

Inspector/Reviewer
9-17-91
Date

 9-17-91
Facility Contact

DH324

*NOTE. FACILITY OPERATES ~~AS~~ an intensive chemical research program prior to purchase of any raw chemical material to eliminate

Dreyfus Research Park



1	ALLEN
2	STOLL
3	ARMSTRONG
4	ADMINISTRATION
5	ENGINEERING
6	WAREHOUSE
7	FLUOR DANIEL

□ DENOTES VISITOR PARKING

RECORD OF COMMUNICATION

PHONE CALL DISCUSSION FIELD TRIP CONFERENCE

OTHER (SPECIFY) CEI Field Notes

(Record of item checked above)

TO: Hoechst Celanese
Dreyfus Research

FROM:

DATE 9.16.91

TIME 1:30

SUBJECT ① Advanced Environmental Technology Corp NCD 986 166 338 Packaging By Environmental Transfer Corp NJD 991 291 584 transport. ^{Exeed moor.}

SUMMARY OF COMMUNICATION ~~D002 - waste anhydrous ammonia.~~
~~F003 - flammable liquid~~
~~F003 - waste acetone~~
~~F003 - acetone, methanol.~~
D002, F003, D001, D022, F004 - D023
D024 - D007
U012 U208, U108, U190, U135, U101, U226

UST closure - 4
30 drums fuel oil
to HES

Bulko
to
TKEM
or CHM.

② GSX Services of SC SCD. Non Regulated

③ PCB Transformers onsite
4 of 12 transformers remain
PCB waste by UNISON.
to ROLLINS ENVISUS
TXD 055 141 378

② HES NCD 121 700 777 D001, F003

③ Hoechst Celanese - ~~CEL RIVER PLANT~~
F003 ACETONE - ON HW Manifest however usable
by CEL RIVER. after distillation; Notification
at plant prior to shipment so there will be no storage
at CEL RIVER

③ D002 ACETONE used as IS.
③ Environ Transfer NJD 991 291 584

④ ECOFLOW INC NCD 980 842 132
D009 waste Mercury

Materials shipped to H Cel - cel River ③ are manifested NCDLR ④
all other manifests LDR OIC

Contingency
a action ✓ b spec ✓ c arrang ✓ d emer coord ✓
e equip loc cap ✓ f evac. signals ✓ routes ✓ alt ✓
g evap Routes are on drawings posted throughout the facility

CONCLUSIONS, ACTION TAKEN OR REQUIRED
Ron Foltz ✓
Richard Summers ✓
Greg Johnson ✓
Ron Caldwell ✓
Mike Bender ✓
John Sattizahn ✓
Ron Bailey ✓

George Bullard
PEM Carter
Rick Smith
BJ Bernard
Ken Smith
HM TEAM - 8 HRS
24 HRS

HW Handlers
Willie Parks
Janet Davis
Virginia Hamrick
Willie Baxter
Ted Linsay
PEM Carter 10-18-90

INFORMATION COPIES TO: Prescriptions ✓ + training ✓ ed/skellor ✓

EPA Form 1300-6 (7-72)
inspection log OK - Storage ✓ date ✓
#drums 69 HW ✓
sit accum - 9

RECORD OF COMMUNICATION

- PHONE CALL
 DISCUSSION
 FIELD TRIP
 CONFERENCE
 OTHER (SPECIFY)

(Record of item checked above)

TO: Celanese-

FROM:

DATE

TIME

SUBJECT Don Loney

Robotics Lab to Creosol/DOOZ waste is automatically put into a 2 or 4 gal chamber under the robot unit and pumped into a Satt drum. levels are checked daily. (pumped by manual switch)

1 drum (Chemical waste on wall) in this lab closed (pump)
Sattelite - Moore's drum - Recycling

Satt areas ① Robotics

Amstons # Drums 3

CP Autoelace # Drums 8

Stalk # Drums 2 (1 DOO1, 1 Halogenated)

Cell River 51 drums F003. - 7/12/91 (90 day)

empty drum policy - for all drums

Allen Bldg 3 drums. (acetone FLAMABLE, DOOZ, Halogenated)

90 day Main pad 5 drums DOO1 w/ Nicotine

Phone un unlocked Bldg Spell bldg -

CONCLUSIONS, ACTION TAKEN OR REQUIRED
MUCH NOV HW Storage but HC Policy - for TSCA Regs.

Labs onsite ± 75.

Spentenburg Salzbung
 Green Cell River
 Cape Celco
 Spelby ?-

INFORMATION COPIES

TO:

RECORD OF CONTACT

DBP PLANT

DATE: 1-5-90

Agency N.C. Department of Environmental, Health and Natural Resources - Division of Solid Waste

Name and Title of Agent(s) Jeanne Rhodes - Chief Hazardous Waste Section
919-733-2178

Contact Initiated by Agency _____ Company DBP

Company Personnel Involved Ludy Smith

Date & Hour Contacted 1-5-90 about 12:45

Contact by Telephone Plant Visit _____ Agency Visit _____

Purpose of Contact To address questions that Adam Wipfield, state EPA Inspector, was not clear on concerning the acetate dope waste stream shipped to Celriver for Acetone recovery -

Comments:

- Mr Rhodes stated that we did not need a N.C. variance to ship the acetate dope to Celriver for recovery.
- Mr. Rhodes did state that the acetate drums should be labelled (HAZARDOUS WASTE) during storage and during transportation to Celriver. However, OK to remove (HAZARDOUS WASTE LABEL) once the drums get to

cc: Celriver -

Ludy Smith

South Carolina Department of Health and Environmental Control

July 1, 1982

2600 Bull Street
Columbia, S.C. 29201

Commissioner
Robert S. Jackson, M.D.



Board
Moses H. Clarkson, Jr., Chairman
Leonard W. Douglas, M.D., Vice-Chairman
Gerald A. Kaynard, Secretary
Barbara P. Nueggle
Oren L. Brady, Jr.
James A. Spruill, Jr.
William H. Hester, M.D.

November 19, 1984

Ms. Susan J. Hardesty
Celanese Fibers Operations
P. O. Box 32414
Charlotte, NC 28232

RE: Celanese Fibers Operations, SCD003159928
Recycling Variance, York County, 1-D

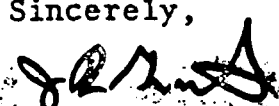
Dear Ms. Hardesty:

The office has evaluated your request to utilize the distillation process at your York County facility to recycle cellulose acetate and cellulose triacetate. We grant your variance to accomplish these tasks subject to the following conditions:

- 1) The collection, transportation, storage, and recycling procedure be performed in an environmentally safe manner.
- 2) Only Celanese waste streams be utilized in the distillation process.
- 3) Report any significant changes in your operation which would effect this variance.
- 4) The waste streams be recycled as soon as possible to prevent storage buildup at the York County facility.
- 5) Comply with R.61-79.261.6, the requirements for waste streams that are recycled.

If you have any further questions concerning this matter please do not hesitate to contact this office.

Sincerely,


J. Rick Grant
Waste Engineering Section
Bureau of Solid and Hazardous
Waste Management

JRG:als
cc: Boyce Faulkner, Catawba
Melissa Johnston

RECEIVED
NOV 21 1984

SAFETY

February 15, 1991

Mrs. P. E. M. Carter, Environmental Engineer
Hoechst-Celanese
P O Box 32414
Charlotte, N.C. 28232-2414

RE: 94% Acetic Acid Stream

Dear Mrs. Carter:

It appears that the 94% acetic acid, 5% water, 1% wood pulp, waste stream described in your February 8, 1991 letter would not be considered a solid waste or a hazardous waste if used as an effective substitute for a commercial product as provided in R.61-79.261.2(e)(1)(ii). Therefore, the transportation and storage of the material would not be regulated provided the material is not accumulated speculatively.

If you have any questions, please call me at (803) 734-5167.

Sincerely,

G. Randall Thompson

G. Randall Thompson
Hazardous Waste Permitting
Bureau of Solid and Hazardous Waste Management

GRT/jta

cc: Claude McLain, Hoechst-Celanese
Al Williams, Catawba

CELANESE DREXUS RESEARCH PARK
2300 ARCHDALE DRIVE
CHARLOTTE

12-11-89

FACILITY DESCRIPTION (CONTINUED)

The acetate dope is currently under review by the Raleigh office as to whether it is actually a hazardous waste or not. Celanese has been granted a variance from the state of South Carolina to the effect that this material can be transported to a generator in South Carolina for distillation. Celanese considers this material to be a useable product and NOT a waste stream. Ms. Smith was instructed to obtain a written determination from the Raleigh office on the classification of this material.

In order to accommodate a wide variety of waste chemicals from the large number of labs on site, Celanese utilizes 3 centrally located satellite accumulation areas, each having a capacity of more than 55 gallons total of hazardous waste. In a telephone communication with Doug Holyfield, Branch Head, I was advised that this arrangement is satisfactory under the principle of inspector discretion and given the fact that Celanese inspects these areas and containers daily and carries on an excellent personnel training program with respect to RCRA.



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous
2600 Bull Street, Columbia
Phone: (803) 734-5257
Emergency & Holidays

NC-0352

LEASE PRINT or TYPE

Form Approved. OMB No. 2050-0039 Expires 6/30/91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. NC D 000608117		Manifest Document No. 101474		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is by State law.													
3. Generator's Name and Mailing Address HOECHST CYANESK - DREYFUS RESEARCH PARK 2300 ARCHDALE DR. CHARLOTTE NC 28210						A. State Manifest Document Number SC01474															
4. Generator's Phone (704) 554-2000 or (704) 554-3020						B. State Generator's ID SAME															
5. Transporter 1 Company Name ENVIRONMENTAL TRANSFER CORP.				6. U.S. EPA ID Number NSD991291584		C. State Trans. ID ND991291584															
7. Transporter 2 Company Name						D. Trans. Phone (201) 347-2215															
9. Designated Facility Name and Site Address ThermalKEM, Inc. HOECHST CYANESK - CERRIVER PLANT 2324 Vernesdale Road 2850 CHERRY ROAD STATION Rock Hill, SC 29730						10. U.S. EPA ID Number 003159928															
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste Number									
a						No.		Type													
X WASTE FLAMMABLE LIQUID, n.o.s. FLAMMABLE LIQUID (ACETONE) UN1993						36		DM		14,400		P F003									
b																					
X WASTE CORROSIVE LIQUID, n.o.s. (DOT 2-7011) CORROSIVE MATERIAL (ACETIC ACID) UN1760						1		DF		250		P D002									
c																					
d																					
J. Additional Descriptions for Materials Listed Above A) L/E ACETONE, CELLULOSE ACETATE (ALSO D001) B) L/C ACETIC ACID, WOOD PULP.						K. Handling Codes for Wastes Listed Above															
15. Special Handling Instructions and Additional Information EMERGENCY RESPONSE NUMBER: DAYTIME (704) 554-2000 NIGHTTIME (704) 554-3330 SAN PAILING SLIPS ATTACHED FOR CLARIFICATION OF MATERIALS.						Public reporting burden for this collection of information is estimated to average 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM 223, U.S. Environmental Protection Agency, 401 M St. S.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										Printed/Typed Name PEM CARTER				Signature <i>PEM Carter</i>				Month Day Year 7 16 91			
17. Transporter 1 Acknowledgement of Receipt of Materials										Printed/Typed Name J LEONARD BECK				Signature <i>Leonard Beck</i>				Month Day Year 7 16 91			
18. Transporter 2 Acknowledgement of Receipt of Materials										Printed/Typed Name TPN				Signature <i>TPN</i>				Month Day Year 7 16 91			
19. Discrepancy Indication Space										a				lbs. c				lbs.			
										b				lbs. d				lbs.			
20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										Printed/Typed Name THOMAS P. NICHOLS				Signature <i>Thomas P. Nichols</i>				Month Day Year 07 16 91			



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.
2600 Bull Street, Columbia, SC 29201
Phone: (803) 734-5200
Emergency & Holidays: (803) 734-5424

USE PRINT or TYPE (Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. <i>NC D0000608117</i>	Manifest Document No. <i>SC00346</i>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.		
3. Generator's Name and Mailing Address <i>Hoechst Celanese Corp. P.O. Box 32414, 2300 Archdale Dr. Charlotte, N.C.</i>				A. State Manifest Document Number <i>SC - 00346</i>			
4. Generator's Phone (704) <i>554-3020</i>				B. State Generator's ID <i>2300 Archdale Drive Charlotte NC 28210</i>			
5. Transporter 1 Company Name <i>ENVIRONMENTAL TRANSFER CORP.</i>		6. U.S. EPA ID Number <i>WJD991291584</i>		C. State Trans. ID <i>NJD 991291584</i>		D. Trans. Phone <i>201 347-2215</i>	
7. Transporter 2 Company Name				E. State Trans. ID		F. Trans. Phone	
9. Designated Facility Name and Site Address <i>Hoechst Celanese - CELRIVER PLANT 2950 CHERRY Rd. Station Rock Hill, SC 29730</i>				10. U.S. EPA ID Number <i>SCD003159928</i>		G. State Facility's ID	
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) <i>WASTE FLAMMABLE LIQUID NOS (CONTAINS Acetone) FLAMMABLE LIQUID UN-1993 035 DM</i>				12. Containers No. Type <i>14,000 P</i>	13. Total Quantity <i>14,000</i>	14. Unit Wt/Vol <i>P</i>	I. Waste Number <i>F003</i>
J. Additional Descriptions for Materials Listed Above <i>A) L/I Acetone, Cellulose Acetate</i>				K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information <i>Emergency Response Number: Daytime 704/554-2600 Nighttime 704/554-3330 Packing slips attached for classification of material</i>							
16. GENERATORS CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the d cable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name <i>PATRICIA E.M. CARTER</i>		Signature <i>Patricia E.M. Carter</i>		Month Day Year <i>4 23 91</i>			
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <i>DAVID J. GERMANN</i>		Signature <i>[Signature]</i>		Month Day Year <i>04 23 91</i>			
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name		Signature		Month Day Year			
19. Discrepancy Indication Space							
a		lbs. c		lbs.			
b		lbs. d		lbs.			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name <i>[Name]</i>		Signature <i>[Signature]</i>		Month Day Year <i>4 13 91</i>			

3 - TSD MAIL TO GENERATOR



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

June 6, 1991

William L. Meyer
Director

Mrs. P.E.M. Carter
Environmental Engineer
Hoechst Celanese Corporation
PO Box 32414
Charlotte, NC 28232-6085

Re: Extension of Accumulation Time

Dear Mrs. Carter:

On June 5, 1991, this Agency received your request for an extension of the 90-day limit for storage of hazardous waste by a generator without a permit. This request is for NCD000608117.

In order to allow sufficient time for one drum of acetone/cellulose acetate flake waste to be disposed rather than recycled, a 30-day extension is hereby granted from June 1, 1991 to June 4, 1991. This is the maximum time allowed under 40 CFR 262.34(b) as adopted in 15A NCAC 13A .0007.

By June 14, 1991, you shall notify this office of the shipment of this waste by sending us a copy of the manifest signed by yourself and the transporter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jerome H. Rhodes".

Jerome H. Rhodes, Chief
Hazardous Waste Section

JHR/MSB/pes

cc: Spring Allen



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

April 26, 1990

Mrs. Ricky Smith
IH/Environmental Engineer
Hoechst Celanese Corporation
PO Box 32414
Charlotte, NC 28232-2414

Re: Extension of Accumulation Time

Dear Mrs. Smith:

On April 25, 1990, this Agency received your request for an extension of the 90-day limit for storage of hazardous waste by a generator without a permit. This request is for NCD000608117.

In order to allow sufficient time for the approval of your Styrene monomer/vinyl ester resin waste at Tradewaste in Sauget, Illinois, a 30-day extension is hereby granted from April 21, 1990 to May 21, 1990. This is the maximum time allowed under 40 CFR 262.34 (b) as adopted in 10 NCAC 10F .0030.

By June 1, 1990, you shall notify this office of the shipment of this waste by sending us a copy of the manifest signed by yourself and the transporter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jerome H. Rhodes".

Jerome H. Rhodes, Chief
Hazardous Waste Section
Solid Waste Management Division

JHR/MSB/pcs

Enclosure

cc: Keith Masters

FACILITY INFORMATION

Celanese Dreffus Research Park
2300 ARCHDALE DRIVE
CHARLOTTE, N.C.

DATE OF INSPECTION

12/11/89

APPLICABLE REGULATIONS

40CFR 26.2

EPA ID NUMBER

NCD 000 608117

MECKLENBURG COUNTY

RESPONSIBLE OFFICIAL: CAMOL WHALEY, SUPERINTENDENT, SAFETY & ENVIRONMENTAL

SURVEY PARTICIPANTS: ADAM WIPFIELD, CAMOL WHALEY, RICKY SMITH

PURPOSE OF SURVEY: A RCRA inspection was conducted at this site in CHARLOTTE, N.C. by the N.C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and records review. Regulatory requirements covered those contained in 40 CFR 26.2 Generator Standards.

DOCUMENTATION OF SITE DEFICIENCIES:

NONE

COMPLIANCE SCHEDULE AND RECOMMENDATIONS:

N/A

FACILITY DESCRIPTION

Celanese is a centralized research and development center for 5 main sections of the Celanese organization. Approximately 80 laboratories operate within the 3 main buildings on this 125-acre site, engaged primarily in research on polyester and cellulosic fibers. A prolific variety of chemicals are used by the laboratories, and hazardous waste generated consists mostly of lab packs covering a wide spectrum of RCRA classifications including D001, D002 and F001-5. All wastes are sent to either Thermal KEM in Rock Hill, S.C., ENSCO in Eldorado, Ark., or Adover in Norwood, N.C. Waste acetate dope, however, is sent to a Celanese plant in Rock Hill, S.C. for distillation to recover acetone. Land ban notifications and treatment standards have been included on manifests since June '87. (CONTINUED)

CELANESE DREYFUS RESEARCH PARK
2300 ARCHDALE DRIVE
CHARLOTTE

12-11-89

FACILITY DESCRIPTION (CONTINUED)

The acetate dope is currently under review by the Raleigh office as to whether it is actually a hazardous waste or not. Celanese has been granted a variance from the state of South Carolina to the effect that this material can be transported to a generator in South Carolina for distillation. Celanese considers this material to be a useable product and not a waste stream. Ms. Smith was instructed to obtain a written determination from the Raleigh office on the classification of this material.

In order to accommodate a wide variety of waste chemicals from the large number of labs on site, Celanese utilizes 3 centrally located satellite accumulation areas, each having a capacity of more than 55 gallons total of hazardous waste. In a telephone communication with Doug Holyfield, Branch Head, I was advised that this arrangement is satisfactory under the principle of inspector discretion and given the fact that Celanese inspects these areas and containers daily and carries on an excellent personnel training program with respect to RCRA.

[call Ricky about
waste ethylene glycol]

(Hoechst Celanese)

(Hoechst) Celanese Dreyfus Research Park

11-29-89

Ricky Smith - I.H. - Industrial Engineer

Return on:
Dec 11 MONDAY
10:00 AM

acetone/DPE Cellulose F003 1-17-89 00200 Buden disc OK

TSD: HOECHST Celanese Celriver Plant
Rock Hill (for recovery) land ban OK

LAB PACK - Advanced Environmental Technology Corp.
FLANDERS, N.J.

F003 waste flammable liquid acetone F003 + acetic acid

TSD: Oldover Norwood for fuel

waste flam. solid (still bottom from above) F003

TSD: M&M Chemical & Equipment Co., Reece City, Ala.

LAB PACK THUNDERBOLT, INC. ROCK HILL

training: 10-20 THRU 10-31 1989 JOB TITLES OK, DESCR OK

CONT. PLAN - SPPC OK evacuation routes alternate _____

EQUIPMENT LOC. OK CHAIRS OK SIGNAL OK

ERC OK ALTERNATE OK

Agencies, Numbers OK COPIES OK

ANNUAL REPORT OK INSPECTION LOG OK

WASTE STORAGE AREAS:

X, Y, Z, Acetate Dope & Chemical Holding pad

Armstrong
5 HW

Stoll
4 HW

Allen
Bldg
6 HW

350MS
No dates,
labels

4 dm HW

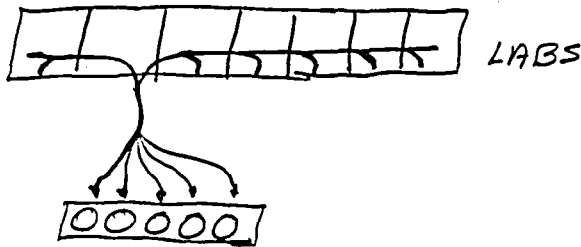
11-29-89

Ceknese

~35 drums acetone-cellulose acetate H/w awaiting SHIPMENT FOR recycling are NOT dated or MARKED w/WORDS "H/w"

* — last SHIPMENT of Acetone/Cellulose Acetate 8/31/89

Filling time: 2 streams take 6 mo to 1 year to fill 55 gal
The others take up to 3 mo.



~40 labs generating waste

GENERATOR INSPECTION FORM - PART 262

Celanese Dreyfuss Research Park NCD 000608117 11 MECKLENBURG
Name of Site EPA I.D. County

2300 HIGHLAND DRIVE CHARLOTTE 12-11-89 Adam Winkler
Location Inspection Date Signature of Inspector(s)

 Richy Smith
Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 Subpart D waste (b)
 Subpart C waste (c)(1)(2)

- 2. EPA Identification Numbers
 EPA generator number (a)
 EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 proper manifest (a)
 permitted facility (b)
- 4. Required Information (262.21)
 document number (a)(1)
 generator identification (a)(2)
 transporter identification (a)(3)
 facility identification (a)(4)
 D.O.T. description (a)(5)
 total quantity (a)(6)
 certification (b)

- 5. Number of Copies (262.22)
 minimum number

- 6. Use of the Manifest (262.23)
 generator handwritten signature (a)(1)
 transporter signature/date (a)(2)
 retain copy (a)(3)
 copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 D.O.T. compliance
- 8. Labeling (262.31)
 D.O.T. compliance
- 9. Marking (262.32)
 D.O.T. compliance (a)
 "HAZARDOUS WASTE" label (b)

- 10. Placarding (262.33)
 D.O.T. compliance
- 11. Accumulation Time (262.34)
 Subpart I; J (a)(1)
 accumulation date (a)(2)
 "Hazardous Waste" (a)(3)
 Subpart C; D (a)(4)*
 personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 manifest retention (a)
 annual/exception report (b)
 test/waste analysis (c)

13. Annual Reporting (262.41)

 submitted (a)(1-6)

 submitted (b)

14. Exception Reporting (262.42)

 transporter contact (a)

 exception report (b)(1)(2)

REMARKS: _____

CONTAINER/TANK INSPECTION FORM - PART 265

Calawese Drayfuss Research Park NCD 00608117
Name of Site EPA I.D.

12-11-89
Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

SUBPART J - TANKS

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: _____



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

December 6, 1989

Mrs. Ricky S. Smith
Environmental and IH Engineer
Hoechst Celanese Corporation
P. O. Box 32414
Charlotte, North Carolina 28232-2414

Re: Extension of Accumulation Time

Dear Mrs. Smith:

On December 5, 1989, this Agency received your request for an extension of the 90-day limit for storage of hazardous waste by a generator without a permit. This request is for NCD000608117.

In order to allow sufficient time for Advanced Environmental Technology Corporation to find a disposal facility for your wastes, a 30-day extension is hereby granted from December 7, 1989, to January 7, 1990. This is the maximum time allowed under 40 CFR 262.34(b) as adopted in 10 NCAC 10F .0030.

By January 17, 1990, you shall notify this office of the shipment of this waste by sending us a copy of the manifest signed by yourself and the transporter.

Sincerely,

A handwritten signature in cursive script that reads "Jerome H. Rhodes".

Jerome H. Rhodes, Chief
Hazardous Waste Section
Solid Waste Management Division

JHR/MSB/lrc

cc: Adam Wipfield

Hoechst Celanese

Hoechst Celanese Corporation
PO Box 32414
Charlotte NC 28232-2414
704 554 2000

November 30, 1989

RSS-8957

RECEIVED
DEC 05 1989

HAZARDOUS WASTE SECTION

Hazardous Waste Section
Solid Waste Management Division
Department of Environment, Health and Natural Resources
P. O. Box 27687
Raleigh, North Carolina 27611-7687

Attention: Mr. Jerry Rhodes

Dear Sir:

A 55-gallon poly drum containing about 35 gallons of a corrosive waste characterized as:

Acetic Acid	80-85%
Cellulose Acetate	10-15%
Hexafluoroisopropanol (HFIP)	5-8%
Acetone	1%
Water	0-2%
Chloroform	Trace
Phenol	Trace
Polyester Polymer	Trace

will be at the end of its 90-day storage time on December 7, 1989. Presently, our waste disposal broker, Advanced Environmental Technology Corporation (AETC) is looking for a disposal facility to handle this material.

I assure you that the drum will be shipped for disposal as soon as possible.

Thank you for your consideration.

Sincerely,

Ricky Smith

(Mrs.) Ricky S. Smith
Environmental and IH Engineer

RSS:hht

cc: Mrs. Nancy Satterfield - AETC

Hoechst 



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JAN 31 1989

4WD-RCRA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Ricky S. Smith
Environmental Engineer
Hoechst Celanese Corporation
P.O. Box 32414
Charlotte, N.C. 28232-2414

RE: Receipt of Certification/Demonstration Submitted Pursuant to
40 CFR 268.8
NCD 000 608 117

Dear Mrs. Smith:

This letter is to acknowledge the receipt by the Director of the Waste Management Division on January 5, 1989, for the certification and demonstration submitted pursuant to 40 C.F.R. 268.8 for the P105, U133 and U134 wastes generated by Hoechst Celanese Corporation.

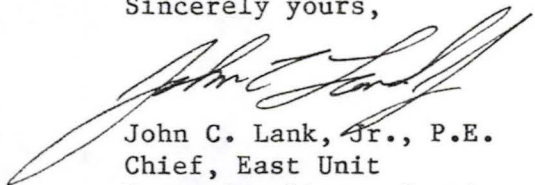
Certification and Demonstration as outlined in 40 C.F.R. 268.8 is self-implementing. Section 268.8(e) states:

"Once the certification is received by the Regional Administrator, and provided that the wastes have been treated by the treatment (if any), determined by the generator to yield the greatest environmental benefit practically available, the wastes may be disposed in a landfill or surface impoundment unit meeting the requirements of 40 C.F.R. 268.5(h)(2), unless otherwise prohibited by the Regional Administrator."

In the event that the decision by the Director of the Waste Management Division is to invalidate a Certification/Demonstration, the generator will be notified. Upon receipt of the Notice of Invalidation, the disposal of the "soft hammer" wastes in a surface impoundment or landfill must cease.

If you should have any questions, you may contact David Langston of my staff at (404)347-7603.

Sincerely yours,



John C. Lank, Jr., P.E.
Chief, East Unit
Waste Compliance Section

cc: Jerry Rhodes, North Carolina DHR
Larry Perry, North Carolina DHR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4WD-RCRA 1989
JAN 31 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Ricky S. Smith
Environmental Engineer
Hoechst Celanese Corporation
P.O. Box 32414
Charlotte, North Carolina 28232-2414

RE: Receipt of Additional Information Pursuant to 40 CFR 268.8
NCD 000 608 117

Dear Mrs. Smith:

This letter is to acknowledge the receipt by the Director of the Waste Management Division on January 5, 1989, for additional information requested pursuant to 40 C.F.R. 268.8 for the "soft hammer" waste generated by Hoechst Celanese Corporation.

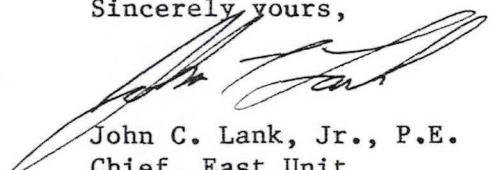
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"Once the certification is received by the Regional Administrator, and provided that the wastes have been treated by the treatment (if any), determined by the generator to yield the greatest environmental benefit practically available, the wastes may be disposed in a landfill or surface impoundment unit meeting the requirements of 40 C.F.R. 268.5(h)(2), unless otherwise prohibited by the Regional Administrator."

In the event that the decision by the Director of the Waste Management Division is to invalidate a Certification/Demonstration, the generator will be notified. Upon receipt of the Notice of Invalidation, the disposal of the "soft hammer" wastes in a surface impoundment or landfill must cease.

If you should have any questions, you may contact David Langston of my staff at 404/347-7603.

Sincerely yours,



John C. Lank, Jr., P.E.
Chief, East Unit
Waste Compliance Section

cc: Jerry Rhodes, North Carolina DHR
Adam Wipfield, North Carolina DHR

GENERATOR INSPECTION FORM - PART 262

Celanese Dreyfus Research Park NCD 000608117 MECKLENBURG
 Name of Site EPA I.D. County
3300 Archdale Drive Charlotte 1-19-89 Adam Winkler
 Location Inspection Date Signature of Inspector(s)
Follow up Ricky Smith
 Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)
- 5. Number of Copies (262.22)
 - minimum number
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
 - D.O.T. compliance
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)



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

James G. Martin, Governor
David T. Flaherty, Secretary

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

January 6, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION
Docket # 89-060

Ms. Ricky Smith
Industrial Hygiene/Environmental Engineer
Celanese Dreyfus Research Park
2300 Archdale Drive
Charlotte, North Carolina 28210

NCD 000 608 117

Dear Ms. Smith:

On December 18, 1980 the State of North Carolina, Hazardous Waste Branch (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 10 NCAC 10F, (Rules) in lieu of the federal RCRA program. Celanese Dreyfus Research Park, Charlotte, North Carolina is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262 codified at 10 NCAC 10F .0030.

On December 21, 1988, Mr. Adam Wipfield, Waste Management Specialist with this office, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violation was noted:

40 CFR 262.20(a), codified at 10 NCAC 10F .0030, states that a generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage or disposal must prepare a manifest OMB control number 2000-0404 on EPA Form 8700-22 and, if necessary, EPA Form 8700-22A according to the instructions included in the appendix to Part 262, which states in item 1: Enter the generator's US EPA twelve digit identification number and the unique five digit number assigned to this manifest by the generator.

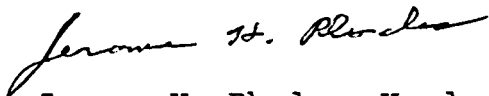
Celanese Dreyfus Research Park is in violation of 40 CFR 262.20(a), codified at 10 NCAC 10F .0030, in that a unique, 5-digit manifest document number is not assigned to each hazardous waste manifest by the generator.

COMPLIANCE SCHEDULE

By January 16, 1989 you must comply with 40 CFR 262.20(a), codified at 10 NCAC 10F .0030, by assigning a unique, 5-digit manifest document number to all future hazardous waste manifests.

If the requirement above is not met, enforcement action including injunctive relief may be obtained for continued violations of the hazardous waste law or regulations.

Sincerely,



Jerome H. Rhodes, Head
Hazardous Waste Branch
Solid Waste Management Section

JHR/dd

cc: Adam Wipfield ✓
Doug Holyfield
Central Files

DH148

FACILITY INFORMATION

Celanese DRETFUS Research Park
2300 ARCHDALE DRIVE
CHARLOTTE, N.C.

DATE OF INSPECTION

10/27/87

APPLICABLE REGULATIONS

40CFR 26.2

EPA ID NUMBER

NCD 000 608117

MECKLENBURG COUNTY

RESPONSIBLE OFFICIAL: CAROL WHALEY, SUPERINTENDENT, SAFETY & ENVIRONMENTAL

SURVEY PARTICIPANTS: ADAM WIPFIELD, CAROL WHALEY, RICKY SMITH

PURPOSE OF SURVEY: A RCRA inspection was conducted at this site in CHARLOTTE, N.C. by the N.C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and records review. Regulatory requirements covered those contained in 40 CFR 26.2 Generator Standards.

DOCUMENTATION OF SITE DEFICIENCIES:

NONE

COMPLIANCE SCHEDULE AND RECOMMENDATIONS:

N/A

FACILITY DESCRIPTION

Celanese is a centralized research and development center for 5 main sections of the Celanese organization. Approximately 80 laboratories operate within the 3 main buildings on this 125-acre site, engaged primarily in research on polyester and cellulosic fibers. A prolific variety of chemicals are used by the laboratories, and hazardous waste generated consists mostly of lab packs covering a wide spectrum of RCRA classifications including D001, D002 and F001-5. All wastes are sent to either Thermal KEM in Rock Hill, S.C., ENSCO in Eldorado, Ark., or Oldover in Norwood, N.C. Waste acetate dope, however, is sent to a Celanese plant in Rock Hill, S.C. for distillation to recover acetone. Land ban notifications and treatment standards have been included on manifests since June '87.

FACILITY INFORMATION

Celanese Dreyfus Research Park
2300 ARCHDALE DRIVE
CHARLOTTE, N.C.

DATE OF INSPECTION

12/21/88

APPLICABLE REGULATIONS

40CFR 262

EPA ID NUMBER

NCD 000 608117

MECKLENBURG COUNTY

RESPONSIBLE OFFICIAL: CAROL WHALEY, SUPERINTENDENT, SAFETY & ENVIRONMENTAL

SURVEY PARTICIPANTS: ADAM WIFFIELD, CAROL WHALEY, RICKY SMITH

PURPOSE OF SURVEY: A RCRA inspection was conducted at this site in CHARLOTTE, N.C. by the N.C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and records review. Regulatory requirements covered those contained in 40 CFR 262 Generator Standards.

DOCUMENTATION OF SITE DEFICIENCIES: 262.20(a) - HAZARDOUS WASTE manifests are NOT sequentially numbered with a UNIQUE, 5-digit identifier assigned by the generator.

COMPLIANCE SCHEDULE AND RECOMMENDATIONS:

NOV. DRAFTED 12/22/88

FACILITY DESCRIPTION

Celanese is a centralized research and development center for 5 main sections of the Celanese organization. Approximately 80 laboratories operate within the 3 main buildings on this 125-acre site, engaged primarily in research on polyester and cellulosic fibers. A prolific variety of chemicals are used by the laboratories, and hazardous waste generated consists mostly of lab packs covering a wide spectrum of RCRA classifications including D001, D002 and F001-5. All wastes are sent to either Thermal KEM in Rock Hill, S.C., ENSCO in Eldorado, Ark., or Odover in Norwood, N.C. Waste acetate dope, however, is sent to a Celanese plant in Rock Hill, S.C. for distillation to recover acetone. Land ban notifications and treatment standards have been included on manifests since June '87.

CONTAINER/TANK INSPECTION FORM - PART 265

Chinese Dreyfus Research PARK NCD 00060817
Name of Site EPA I.D.

12/21/88
Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition Of Containers (265.171).

- leakage
- past leakage (evidence)
- severe rusting
- structural defect

~~1. General Operating Requirements (265.192)~~

- ~~___ compatibility (a)(b)~~
- ~~___ uncovered tank precautions (c)~~
- ~~___ overflow prevention (d)~~

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance (leakage, corrosion)

~~2. Waste Analysis and Trial Tests (265.193)*~~

- ~~*Section not applicable to a generator only~~
- ~~___ waste analysis/trial test~~

3. Management of Containers (265.173)

- closed (a)
- improper handling or storage (b)

~~3. Inspections (265.194)~~

- ~~___ discharge control equipment (a)(1)~~
- ~~___ monitoring equipment (a)(2)~~
- ~~___ waste level (a)(3)~~
- ~~___ construction material (a)(4)~~
- ~~___ surrounding area (a)(5)~~
- ~~___ assessment schedule/procedures (b)~~

4. Inspections (265.174)

- weekly (minimum)

~~4. Closure (265.197)~~

- ~~___ plan on-site~~

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

~~5. Special Requirements For Ignitable Or Reactive Waste (265.198)~~

- ~~___ properly stored (a)(1)(2)(3)~~
- ~~___ buffer requirements (b)~~

6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
- unwashed container (b)
- separation (c)

~~6. Special Requirements For Incompatible Wastes (265.199)~~

- ~~___ properly stored (a)~~
- ~~___ tank washed (b)~~

REMARKS: _____

GENERATOR INSPECTION FORM - PART 262

Chinese Dreyfus Research Park NCD 000 608 117 MECKLENBURG County
 Name of Site EPA I.D.
2300 Archdale Drive Charlotte 12/21/88 Adam W. Smith Signature of Inspector(s)
 Location Inspection Date
X Licky Smith Signature of Facility Contact
 Compliance Date

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)
 - LAND BAN 268.7**
5. Number of Copies (262.22)
 - minimum number
6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

7. Packaging (262.30)
 - D.O.T. compliance
8. Labeling (262.31)
 - D.O.T. compliance
9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)
10. Placarding (262.33)
 - D.O.T. compliance
11. Accumulation time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*
 - SATELLITE ACCUMULATION (X)(1), (2)**
 - *Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)

13. Annual Reporting (262.41)

C submitted (a)(1-6)

C submitted (b)

14. Exception Reporting (262.42)

C transporter contact (a)

C exception report (b)(1)(2)

REMARKS: 262.20(a)

MANIFEST DOCUMENT NUMBERS ARE NOT UNIQUE, ASSIGNED
by generator as per instructions

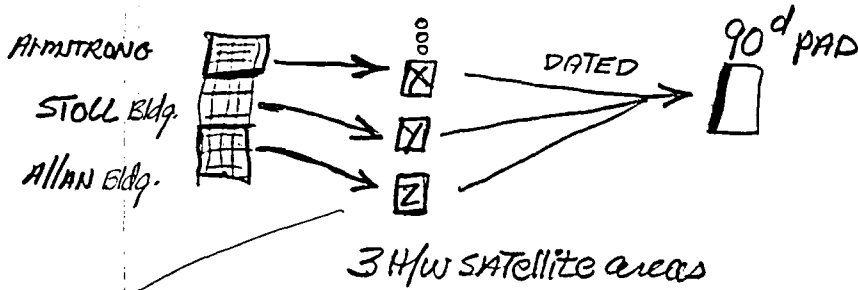
Celanese DREYFUS RESEARCH

12/21/88

RICKY SMITH

acetate dope - recycled by Rock Hill Celanese
lab waste streams same as last year

About 30 labs:



3 HW SATELLITE areas

<55gal

fire regs allow only 5gal storage in each lab
each addition to storage drums is RECORDED
all waste streams are segregated

- training OK All personnel being updated CONT. PLAN but OK
- INSR. Logs OK - enlarge COMMENTS section
- ANNUAL REPT. OK
- MANIFESTS OK; Numbers NOT sequential assigned by generator



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

James G. Martin, Governor
David T. Flaherty, Secretary

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

October 31, 1988

Ms. Ricky Smith
Industrial Hygiene/
Environmental Engineer
Hoechst Celanese Corporation
PO Box 32414
Charlotte, NC 28232

RE: Extension of Accumulation Time

Dear Ms. Smith:

On October 28, 1988, this Agency received your request for an extension of the 90 day limit for storage of hazardous waste by a generator without a permit. This request is for NCD000608117

In order to allow sufficient time for approval of one 55 gallon drum of Cellulose Acetate at DHEC and Thermalkem for incineration, a 30-day extension is hereby granted from October 29, 1988 to November 29, 1988. This is the maximum time allowed under 40 CFR 262.34(b) as adopted in 10 NCAC 10F .0030.

By December 11, 1988, you shall notify this office of the shipment of this waste by sending us a copy of the manifest signed by yourself and the transporter.

Sincerely,

A handwritten signature in cursive script that reads "Jerome H. Rhodes".

Jerome H. Rhodes, Head
Hazardous Waste Branch
Solid Waste Management Section

JHR/pcs

cc: Adam Wipfield

CELANESE 10-27-87

About 80 Labs ON-SITE - research + Dev. ON Polyester & Cellulosic fibers.

Solvents from Lab use - ① ThermalKEM (80%) Rock Hill
+ WOME TO fuels program: ② Oldover Norwood
+ ENCO - Eldorado, Ark

also:
D002, D001 from LAB Pack ④ EcoFlo of N.C. Greensboro
FOO1, 2, 3, 5, 4

LAND BAN was done as of
About June '87

Send waste acetate dope to Celanese - Cel River Plant in Rock Hill
for distillation to recover Acetone (FOO3)

3 satellite Pads

X - Armstrong Bldg. ↙

Y - STOLL

↗ Z - Allen

1 Holding PAD (90°)

each has 5 H/W drums for different categories

GENERATOR INSPECTION FORM - PART 262

Colony Dreyfus Research Park NCD 000608117 MECKLENBURG
 Name of Site EPA I.D. County
2300 MECHDALE DRIVE CHARLOTTE 10/27/87 Ann W. Wild
 Location Inspection Date Signature of Inspector(s)
 Compliance Date Ricky Smith
 Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)
- 5. Number of Copies (262.22)
 - minimum number
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
 - D.O.T. compliance
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)

13. Annual Reporting (262.41)

 submitted (a)(1-6) submitted (b)

14. Exception Reporting (262.42)

 transporter contact (a) exception report (b)(1)(2)REMARKS: No violations

CONTAINER/TANK INSPECTION FORM - PART 265

Colanese Dreyfus Research Park

NCD 000608117

10/27/87

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

SUBPART J - TANKS

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: *No violations*

GENERATOR INSPECTION FORM - PART 262

Chinese Dreyfus Research Park NCID 000608117 MECKLENBURG
 Name of Site EPA I.D. County
2300 ARCHDALE DRIVE 11/13/86 Adam Wiffield
 Location Inspection Date Signature of Inspector(s)
 Pickens Smith
 Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

1. Hazardous Waste Determination (262.11)

- Subpart D waste (b)
 Subpart C waste (c)(1)(2)

2. EPA Identification Numbers

- EPA generator number (a)
 EPA transporter/facility (c)

SUBPART B - THE MANIFEST

3. General Requirements (262.20)

- proper manifest (a)
 permitted facility (b)

4. Required Information (262.21)

- document number (a)(1)
 generator identification (a)(2)
 transporter identification (a)(3)
 facility identification (a)(4)
 D.O.T. description (a)(5)
 total quantity (a)(6)
 certification (b)

5. Number of Copies (262.22)

- minimum number

6. Use of the Manifest (262.23)

- generator handwritten signature (a)(1)
 transporter signature/date (a)(2)
 retain copy (a)(3)
 copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

7. Packaging (262.30)

- D.O.T. compliance

8. Labeling (262.31)

- D.O.T. compliance

9. Marking (262.32)

- D.O.T. compliance (a)
 "HAZARDOUS WASTE" label (b)

10. Placarding (262.33)

- D.O.T. compliance

11. Accumulation Time (262.34)

- Subpart I; J (a)(1)
 accumulation date (a)(2)
 "Hazardous Waste" (a)(3)
 Subpart C; D (a)(4)*
 personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

12. Recordkeeping (262.40)

- manifest retention (a)
 annual/exception report (b)
 test/waste analysis (c)

13. Annual Reporting (262.41)

submitted (a)(1-6)

submitted (b)

14. Exception Reporting (262.42)

transporter contact (a)

exception report (b)(1)(2)

REMARKS:

No violations cited

CONTAINER/TANK INSPECTION FORM - PART 265

Chinese Dryfus Research Park NCD000608117
Name of Site EPA I.D.

11/12/86
Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum)
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- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: No VIOLATIONS NOTED

NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES

SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

P.O. BOX 2091 RALEIGH, NORTH CAROLINA 27602-2091

306 N. WILMINGTON ST.

INSPECTION ACTIONS

STAFF ID: 49 NAME: LARRY FOX INSPECTION DATE: 6-10-86

EPA ID NO. NCD000608117 NAME: CELANESE FIBERS TECH. CENTER

ADDRESS: 2300 ARCHDALE DR. CITY: CHARLOTTE

NEW: UP DATE: FACILITY CONTACT: SUSAN J. HARDESTY

AGENCY RESP. FOR INSPECTION: STATE: EPA: JOINT: EPA OVERSIGHT

RCRA CLASS: GEN: TRANS: INTERIM TSDF: PERMITTED TSDF

TYPE OF INSPECTION: 1

1 = (RCRA) EVALUATION	6 = OTHER (COMPLAINT)
2 = SAMPLING	7 = OTHER (PART B CALL)
3 = RECORD REVIEW	8 = OTHER (WITHDRAWAL)
4 = GROUND WATER	9 = OTHER (CLOSED FAC.)
5 = FOLLOW UP	10 = OTHER (GENERAL)

LOCATION: ON SITE: FIELD OFFICE: RALEIGH OFFICE: OTHER

RESULT: IN COMPLIANCE: IN VIOLATION-DOCKET NO. _____

AREAS IN VIOLATION:

<input type="checkbox"/> SG .261:	<input type="checkbox"/> TSDF.264:	<input type="checkbox"/> GW. 264:	<input type="checkbox"/> CONT. 264:
<input type="checkbox"/> GEN.262:	<input type="checkbox"/> TSDF.265:	<input type="checkbox"/> GW. 265:	<input type="checkbox"/> CONT. 265:
<input type="checkbox"/> TRN.263:	<input type="checkbox"/> C/PC.264:	<input type="checkbox"/> FIN.264:	<input type="checkbox"/> MF. 264:
<input type="checkbox"/> PER.270:	<input type="checkbox"/> C/PC.265:	<input type="checkbox"/> FIN.265:	<input type="checkbox"/> MF. 265:

HANDLING METHODS:

<input type="checkbox"/> CNTR.264:	<input type="checkbox"/> INCN.264:	<input type="checkbox"/> SURF.264:
<input type="checkbox"/> CNTR.265:	<input type="checkbox"/> INCN.265:	<input type="checkbox"/> SURF.265:

ENFORCEMENT ACTION

<input type="checkbox"/> N.O.V.	<input type="checkbox"/> WARNING LETTER	<input type="checkbox"/> INFORMAL
<input type="checkbox"/> FILED CIVIL ACTION	<input type="checkbox"/> FILED CRIMINAL ACTION	
<input type="checkbox"/> ADMINISTRATIVE ORDER 3008		
<input type="checkbox"/> CONSENT ORDERED	<input type="checkbox"/> 3007 LETTER	

PENALTY RECOMMENDED \$ _____

SCHEDULED REINSPECTION DATES: 1 _____ 2 _____ 3 _____
4 _____ 5 _____ 6 _____

COMMENTS: Facility has a good Hazardous Waste System in operation. In compliance.

GENERATOR INSPECTION FORM - PART 262

Celanese Fibers Technical Center N.C.D 000608117 Mecklenburg
 Name of Site EPA I.D. County

2300 Archdale Dr., Charlotte, N.C. 6-10-86
 Location Inspection Date

_____ Susan J. Hardisty
 Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11) O.K.
 Subpart D waste (b)
 Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers O.K.
 EPA generator number (a)
 EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20) O.K.
 proper manifest (a)
 permitted facility (b)
- 4. Required Information (262.21) O.K.
 document number (a)(1)
 generator identification (a)(2)
 transporter identification (a)(3)
 facility identification (a)(4)
 D.O.T. description (a)(5)
 total quantity (a)(6)
 certification (b)
- 5. Number of Copies (262.22) O.K.
 minimum number
- 6. Use of the Manifest (262.23) O.K.
 generator handwritten signature (a)(1)
 transporter signature/date (a)(2)
 retain copy (a)(3)
 copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30) O.K.
 D.O.T. compliance
 - 8. Labeling (262.31) O.K.
 D.O.T. compliance
 - 9. Marking (262.32) O.K.
 D.O.T. compliance (a)
 "HAZARDOUS WASTE" label (b)
 - 10. Placarding (262.33) O.K.
 D.O.T. compliance
 - 11. Accumulation Time (262.34) O.K.
 Subpart I; J (a)(1)
 accumulation date (a)(2)
 "Hazardous Waste" (a)(3)
 Subpart C; D (a)(4)*
 personnel training (a)(4)*
- *Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40) O.K.
 manifest retention (a)
 annual/exception report (b)
 test/waste analysis (c)

Celanese Fibers Technical Center

Charlotte, N.C.

NCD 000608117

6-10-86

13. Annual Reporting (262.41)

submitted (a)(1-6)

submitted (b)

14. Exception Reporting (262.42)

transporter contact (a)

exception report (b)(1)(2)

REMARKS: O.K. in full compliance

Lined area for additional remarks or notes.

CONTAINER/TANK INSPECTION FORM - PART 265

Calanese Fibers Technical Center N.C.D000608117
 Name of Site EPA I.D.

6-10-86
 Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

- 1. Condition Of Containers (265.171) O.K.
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172) O.K.
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173) O.K.
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174) O.K.
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176) O.K.
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177) O.K.
 - mixing (a)
 - unwashed container (b)
 - separation (c)

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: O.K in full compliance



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
919/733-3446

April 26, 1985

SUSAN HARDESTY
Celanese Fibers Technical Center
PO Box 32414
Charlotte NC 28232
EPA NUMBER: NCD000608117

Dear SUSAN HARDESTY:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

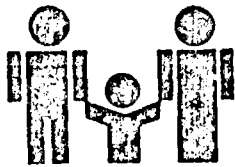
Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 02/05/85 by Mr. ANDREW HENDERSON Solid and Hazardous Waste Management Branch. No violations were observed. The inspection did not include a review of the Financial or Ground Water monitoring requirements, if applicable. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Paige", written in a cursive style.

William Paige
Environmental Engineer
Solid and Hazardous Waste
Management Branch
Environmental Health Section

Copy: ANDREW HENDERSON



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

Date: 2-8-85

Inspector: Mack Henderson

Section I. General Information

COMPANY NAME:

Colanese Fibers Tech Ctr
Charlotte (City)

EPA ID No.:

NCID 000 608 117

INSPECTION/ACTION DATE:

2-5-85

CONTACT:

Susan Hardesty
(print)

Section II. RCRA Classification

Generator; () Transporter; () Interim Status-TSDF; () Final Status-TSDF

Section III. Inspection/Action Classification

() Initial Annual (Gen, Trans.); () Initial Semi-annual (TSDF); Re-inspection

Section IV. Action Codes

Compliance Inspection; () Sampling Inspection; () Compliance Order Inspection; () Non-notifier Inspection; () Overview Inspection; () Complaint Inspection; () Record Review; () Comprehensive Groundwater Evaluation; () Negotiation Meeting; () Informal Settlement Agreement; () State Order - (Consent, Administrative, etc.); () Hearing; () Penalty Assessed; () Penalty Collected; () Civil Action; () Criminal Action

Section V. Compliance Status

In Compliance; () In Violation; () All Previous Violation Existing; () Previous Violations Corrected - But New Ones Exist; () Previous Violation Existing Along With Additional Ones.

Section VI. Letter Action

() NOV; () CO; In Compliance; () Penalty; () None

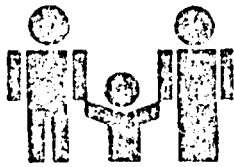
Section VII. Compliance Date

mo/day/yr

FOR RALEIGH OFFICE USE ONLY:

I. () I II. Compliance Order Date
() G
() F
() C
_____ mo/day/yr

DHS 3218 Rev. 10/84
Solid & Hazardous Waste



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

*Full Comp
2-5-85*

Date: 12-21-84

Inspector: Mark Henderson

Section I. General Information

COMPANY NAME:

Calanese Fibers Tech Ctr
Charlotte (City)

EPA ID No.:

NCD 000 608 117

INSPECTION/ACTION DATE:

12-21-84

CONTACT:

(print)

Section II. RCRA Classification

Generator; () Transporter; () Interim Status-TSDF; () Final Status-TSDF

Section III. Inspection/Action Classification

Initial Annual (Gen, Trans.); () Initial Semi-annual (TSDF); () Re-inspection

Section IV. Action Codes

Compliance Inspection; () Sampling Inspection; () Compliance Order Inspection; () Non-notifier Inspection; () Overview Inspection; () Complaint Inspection; () Record Review; () Comprehensive Groundwater Evaluation; () Negotiation Meeting; () Informal Settlement Agreement; () State Order - (Consent, Administrative, etc.); () Hearing; () Penalty Assessed; () Penalty Collected; () Civil Action; () Criminal Action

Section V. Compliance Status

() In Compliance; In Violation; () All Previous Violation Existing; () Previous Violations Corrected - But New Ones Exist; () Previous Violation Existing Along With Additional Ones.

Section VI. Letter Action

NOV; () CO; () In Compliance; () Penalty; () None

Section VII. Compliance Date

2-5-85
mo/day/yr

FOR RALEIGH OFFICE USE ONLY:

I. () I II. Compliance Order Date
() G
() F
() C
_____ mo/day/yr

DHS 3218 Rev. 10/84
Solid & Hazardous Waste



GENERATOR INSPECTION FORM - PART 262

Celanese Fibers Text. Div NED 000608117 Madison
 Name of Site EPA I.D. County
2300 Arndale 12-21-84 Mark Heubert
 Location Inspection Date Signature of Inspector(s)
Feb 5, '84 Ann J. Heidrich
 Compliance-Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)

- 5. Number of Copies (262.22)
 - minimum number
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C --PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
 - D.O.T. compliance
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)

13. Annual Reporting (262.41)

- submitted (a)(1-6)
- submitted (b)

14. Exception Reporting (262.42)

- transporter contact (a)
- exception report (b)(1)(2)

REMARKS: ✓ 265.37(a)(4) arrangements with hospital
✓ 265.53 submit plan to hospital
✓ 265.52 (a) describe arrangements with fire hospital & police
✓ 267.34(a)(2) & (3) corrected during inspection

CONTAINER/TANK INSPECTION FORM - PART 265

Colanese Fibers Tech Mr

NCD 000 608117

12-21-84

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition Of Containers (265.171)

- leakage
- past leakage (evidence)
- severe rusting
- structural defect

1. General Operating Requirements (265.192)

- compatibility (a)(b)
- uncovered tank precautions (c)
- overflow prevention (d)

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance (leakage, corrosion)

2. Waste Analysis and Trial Tests (265.193)*

- *Section not applicable to a generator only
- waste analysis/trial test

3. Management of Containers (265.173)

- closed (a)
- improper handling or storage (b)

3. Inspections (265.194)

- discharge control equipment (a)(1)
- monitoring equipment (a)(2)
- waste level (a)(3)
- construction material (a)(4)
- surrounding area (a)(5)
- assessment schedule/procedures (b)

4. Inspections (265.174)

- weekly (minimum)

4. Closure (265.197)

- plan on-site

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

- properly stored (a)(1)(2)(3)
- buffer requirements (b)

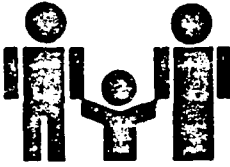
6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
- unwashed container (b)
- separation (c)

6. Special Requirements For Incompatible Wastes (265.199)

- properly stored (a)
- tank washed (b)

REMARKS: No Container Violations noted.



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES

P.O. Box 2091

Raleigh, N.C. 27602-2091

January 10, 1985

SUSAN HARDESTY
Celanese Fibers Technical Center
PO Box 32414
Charlotte, NC 28232
EPA NUMBER: NCD000608117

Dear Ms. Hardesty:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 12/21/84 by Mr. ANDREW HENDERSON, Solid and Hazardous Waste Management Branch. The inspection revealed noncompliance in several areas. Attached is a copy of the inspection report which denotes the deficiencies.

A compliance date of 02/05/85 has been established for the correction of these deficiencies. If you have any questions pertaining to this subject, please contact me at (919) 733-2178.

Sincerely,

William Paige
Environmental Engineer
Solid and Hazardous Waste
Management Branch
Environmental Health Section

✓
copy: ANDREW HENDERSON

GENERATOR INSPECTION FORM - PART 262

Name of Site
Celanese Fibers Technical Center

EPA I.D.
NCD000608117

County
Mecklenburg

Location
Charlotte NC 28232

Inspection Date
12 / 21 / 84

Inspector
ANDREW HENDERSON

Compliance Date
02 / 05 / 85

Facility Contact
SUSAN HARDESTY

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)
5. Number of Copies (262.22)
 - minimum number
6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - 'HAZARDOUS WASTE' label (b)
- 10. Placarding (262.33)
 - D.O.T. compliance
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - 'Hazardous Waste' (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - biennial/exception report (b)
 - test/waste analysis (c)
- 13. Biennial Reporting (262.41)
 - submitted (a)(1-6)
 - submitted (b)
- 14. Exception Reporting (262.42)
 - transporter contact (a)
 - exception report (b)(1)(2)

Remarks: 265.37(A)(4),_265.53,_265.52(C),_262.34(A)(2)(3)_____



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 10, 1984

S. J. Hardesty
Celanese Fibers Technical Center
PO Box 32414
Charlotte, NC 28232
EPA NUMBER: NCD000608117


Dear Mr. Hardesty:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 12/15/83 by Mr. Larry O. Fox, Solid and Hazardous Waste Management Branch. The inspection revealed compliance with the regulations. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,


O. W. Strickland, Head
Solid and Hazardous Waste
Management Branch
Environmental Health Section

copy: Larry O. Fox



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

Date: February 6, 1984

Ms. Susan J. Hardesty
Celanese Fibers Operations
P.O. Box 32414
Charlotte, NC 28232

Re: Facility ID No. NCD 000 608 117

Dear Ms. Hardesty:

Based on information supplied by you we have processed and accepted at the State level your request for the facility identified with the above ID number to receive the indicated change in classification under RCRA:

<u>Add As</u>	<u>Delete As</u>	
<input type="checkbox"/>	<input type="checkbox"/>	generator
<input type="checkbox"/>	<input type="checkbox"/>	transporter
<input type="checkbox"/>	<input type="checkbox"/>	treater
<input type="checkbox"/>	<input checked="" type="checkbox"/>	storer
<input type="checkbox"/>	<input type="checkbox"/>	disposer
<input type="checkbox"/>	<input type="checkbox"/>	small generator

We are advising EPA of the change in your status. Please notify us if there is any further change in your operations which would again affect your status. Your EPA ID NO. is is not being cancelled.

Cordially,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS/ KL:tl

cc: Doug McCurry
EPA Region IV
Emil Breckling
Larry Fox

DHS Form 3048 3/82
Solid & Haz. Waste Mgt. Branch

- 15. Emergency Procedures (265.56)
 - activation of alarm system (a)(1)
 - notification to State/Local agencies of discharge (a)(2), (d)(1)(2)
 - hazard assessment (c)
 - reasonable prevention measures (e)
 - monitor for leaks, pressure buildup, etc. (f)
 - proper management of recovered waste, contaminated soil or surface water (g)
 - compatibility with contaminated areas (h)(1)
 - emergency equipment cleaned (h)(2)
 - notification of compliance (i)
 - written report (15 days)/operating record notation (j)

SUBPART E - MANIFEST SYSTEM, RECORDKEEPING

- 16. Use of Manifest System (265.71)
 - sign, date (a)(1)
 - note discrepancies (a)(2)
 - copy to transporter (a)(3)
 - copy to generator (30 days) (a)(4)
 - TSDF copy (a)(5)
 - rail or water transporter (b)(1)(2)(3)(4)(5)
 - generator compliance (c)

- 17. Manifest Discrepancies (265.72)
 - bulk discrepancies (a)(1)
 - batch discrepancies (a)(2)
 - written report, if required (b)

- 18. Operating Record (265.73)
 - written (a)
 - quantity, handling methods, dates (b)(1)
 - location/quantity with cross reference (b)(2)
 - waste analysis (b)(3)
 - incident reports (b)(4)
 - inspection record (b)(5)
 - monitoring, testing results (for incinerators) (b)(6)
 - closure/post closure cost (b)(7)

- 19. Availability, Retention, and Disposition of Records (265.74)
 - access to records (a)
 - retention (b)
 - records submitted (c)

- 20. Annual Report (265.75)
 - submit by March 1 (a)(b)(c)(d)(e)(f)(g)(h)

- 21. Unmanifested Waste Report (265.76)
 - within 15 days (a)(b)(c)(d)(e)(f)(g)

- 22. Additional Reports (265.77)
 - Section 264.56(j) report (a)
 - facility closure (c)

SUBPART G - CLOSURE AND POST-CLOSURE

- 23. Closure Plan; Amendment of Plan (265.112)
 - written (a)
 - inventory modification (a)(2)
 - amendment (b)
 - 180 day notice (c)

- 24. Disposal or Decontamination of Equipment (265.114)
 - equipment disposal/decontamination

- 25. Post-Closure Plan; Amendment of Plan (265.118)
 - written (a)
 - amendment/modification (b)(c)

SUBPART H - FINANCIAL REQUIREMENTS

- 26. Cost Estimate For Closure (265.142)
 - written (a)
 - anniversary adjustment (b)
 - change adjustment (c)
 - available for inspection (d)

- 27. Financial Assurance For Closure (265.143)
 - yes;
 - Specify form F, I, T, S

- 28. Estimate For Post-Closure Care (264.144)
 - written (a)
 - anniversary adjustment (b)
 - change adjustment (c)
 - available for inspection (d)

- 29. Financial Assurance For Post-Closure Care (265.145)
 - yes;
 - Specify form _____

- 30. Liability Requirements (265.147)
 - sudden occurrences (a)
 - non-sudden occurrences (b)

- 31. Incapacity of Owners or Operators, Guarantors or Financial Institutions (265.148)
 - compliance (a)(b)

CONTAINER/TANK INSPECTION FORM - PART 265

Chelmsford Fibers Technical Center NCD 000608117 12-15-83
Name of Site EPA I.D. Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition Of Containers (265.171)

- leakage
- past leakage (evidence)
- severe rusting
- structural defect

1. General Operating Requirements (265.192)

- compatibility (a)(b)
- uncovered tank precautions (c)
- overflow prevention (d)

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance (leakage, corrosion)

2. Waste Analysis and Trial Tests (265.193)*

- *Section not applicable to a generator only
- waste analysis/trial test

3. Management of Containers (265.173)

- closed (a)
- improper handling or storage (b)

3. Inspections (265.194)

- discharge control equipment (a)(1)
- monitoring equipment (a)(2)
- waste level (a)(3)
- construction material (a)(4)
- surrounding area (a)(5)
- assessment schedule/procedures (b)

4. Inspections (265.174)

- weekly (minimum)

4. Closure (265.197)

- plan on-site

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

- properly stored (a)(1)(2)(3)
- buffer requirements (b)

6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
- unwashed container (b)
- separation (c)

6. Special Requirements For Incompatible Wastes (265.199)

- properly stored (a)
- tank washed (b)

REMARKS: OK in full compliance

GENERATOR INSPECTION FORM - PART 262

Chinese Fiber Technical Center NC D000608117 Mecklenburg
 Name of Site P.O. Box 3 2-7-14, Charlotte, N.C. 28232 EPA I.D. County
2500 Archdale Dr., Charlotte, N.C. 28210 [12-15-83] 7-01
 Location Inspection Date Signature of Inspector(s)

 Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)
- 5. Number of Copies (262.22)
 - minimum number
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
 - D.O.T. compliance
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)

13. Annual Reporting (262.41)

- submitted (a)(1-6)
- submitted (b)

14. Exception Reporting (262.42)

- transporter contact (a)
- exception report (b)(1)(2)

REMARKS: O.K. in full compliance

GENERAL SITE INSPECTION CHECKLIST

Celavere NCD 00068117
 Name EPA I.D. County
Durham 12-15-83
 Location Contact Person Date
Z Jay
 Field Investigator

INSTRUCTIONS: In the space provided, check the appropriate response.

1. Characterization of site activity:

a. check off the appropriate activities below:

STORER	TREATER	DISPOSER
Pile <input type="checkbox"/>	Filtration <input type="checkbox"/>	Landfill <input type="checkbox"/>
Surface Impoundment <input type="checkbox"/>	Incineration <input type="checkbox"/>	Land Treatment <input type="checkbox"/>
Drums <input checked="" type="checkbox"/>	Thermal Treatment <input type="checkbox"/>	Surface Impoundment <input type="checkbox"/>
Tank, Above Ground <input type="checkbox"/>	Volume Reduction <input type="checkbox"/>	Incineration <input type="checkbox"/>
Tank, Below Ground <input type="checkbox"/>	Recycling/Recovery <input type="checkbox"/>	Other <input type="checkbox"/>
Other <input type="checkbox"/>	Chem/Phys/Bio Treatment <input type="checkbox"/>	
	Waste Oil <input type="checkbox"/>	
	Reprocessing <input type="checkbox"/>	
	Solvent Recovery <input type="checkbox"/>	
	Other <input type="checkbox"/>	

b. specify details of site activities as needed:

c. site description (acreage, etc.) 105 Acre

Actions Taken or Planned (Items 2 - 5 information is available on generator checklist if filled out)

2. Permit information:

a. Check all applicable permits held by the site:

NPDES Permit SPCC Plan State Permit (Specify) _____
 Air Permits Local Permit RCRA Disposer
 RCRA Storer RCRA Treater
 Other (Specify) _____

In Compliance (Check) Yes No Unknown with respect to: _____
Regulation Name/#

- Continued

3. Past regulatory actions: (Check)

None

Yes If yes, summarize: _____

4. Inspection activity (past or on-going): (Check)

None

Yes

Date of Past Action _____ Performed by _____ Describe: _____

5. Remedial Activity (past or on-going): (Check)

None

Yes

Describe: _____

General Facility Standards

Subpart B:

	<u>YES</u>	<u>NO</u>
6. a. EPA identification number (265.11)	()	()
b. foreign shipments (265.12)	()	()
c. new owner/operator (265.12)	()	()
7. General Waste Analysis Plan must include: (265.13)		
a. test methods	(X)	()
b. sampling method	(X)	()
c. review or repeat of analysis	(X)	()

- Continued

- | | <u>YES</u> | <u>NO</u> |
|--|------------|-----------|
| 8. Adequate security: (265.14)
(The facility may be exempt under (265.14(a)(1)(2)) | (X) | () |
| a. 24 hour surveillance system (265.14(b)(1)) | (X) | () |
| b. <u>or</u>
<u>artificial</u> or natural barrier around
<u>facility</u> (265.14(b)(2)(i)) | () | () |
| c. <u>and</u>
<u>means</u> to control entry (265.14(b)(2)(ii)) | (X) | () |
| d. danger sign(s) at entrance(s) (265.14(c)) | (X) | () |
| 9. Inspection requirements must include: (265.15) | | |
| a. malfunction (265.15(a)) | (X) | () |
| b. operator error (265.15(a)) | (X) | () |
| c. discharges (265.15(a)) | (X) | () |
| d. written inspection schedule (265.15(b)(1)(2)) | (X) | () |
| 1. monitoring equipment | () | () |
| 2. safety, emergency equipment | () | () |
| 3. security devices | () | () |
| 4. operating and structural equipment | (X) | () |
| e. inspection log (265.15(d)) | (X) | () |
| 10. Personnel training records: (265.16) | | |
| a. job titles (265.16(d)(1)) | (X) | () |
| b. description of training (265.16(d)(2)) | () | () |
| c. records of training (265.16(d)(3)) | () | () |
| 11. Requirements for ignitable, reactive or
incompatible wastes: (265.17) | | |
| a. proper handling (265.17) | () | () |
| b. no smoking signs (265.17(a)) | (X) | () |
| c. separation and confinement (265.17(a)) | (X) | () |
| d. check waste containers (265.17(a)) | (X) | () |

- Continued

Preparedness and Prevention

Subpart C:

- | | <u>YES</u> | <u>NO</u> |
|---|------------|-----------|
| 12. Maintenance and operation of facility: (265.31) | | |
| a. evidence of fire, explosion or
contamination of the environment | () | () |
| 13. Required equipment: (265.32) | | |
| a. alarm system (265.32(a)) | () | () |
| b. telephone or 2-way radio (265.32(b)) | () | () |
| c. portable fire extinguishers, fire
control, spill control equipment and
decontamination equipment (265.32(c)) | () | () |
| d. water of adequate volume for hoses,
sprinklers or water spray system (265.32(d)) | () | () |
| 14. Testing and maintenance of equipment (265.33) | | |
| a. testing and maintenance procedures | () | () |
| b. condition of equipment | () | () |
| 15. Access to communications or alarm systems (265.34)
(unless exempt under 265.32) | () | () |
| 16. Required aisle space (265.35) | () | () |
| 17. Arrangements with local authorities (265.37)
(Note 265.37(b)) | | |
| a. Attempted arrangements (265.37(a)) | () | () |
| b. Agreement with state emergency response
teams (265.37(Q)(3)) | () | () |

Contingency Plan and Emergency Procedures

Subpart D:

- | | | |
|---|-----|-----|
| 18. Content of contingency plan (265.52) | | |
| 1. Does facility have a contingency plan (265.52) | () | () |
| 2. Local agreements (265.52(c)) | () | () |
| 3. Emergency coordinator(s) (265.52(d))
(Phone No./qualifications) | () | () |
| 4. Emergency equipment list (265.52(e)) | () | () |
| 5. Evacuation Plan (265.52(f)) | () | () |

- Continued

- | | <u>YES</u> | <u>NO</u> |
|---|------------|-----------|
| 19. Copies of contingency plan (265.53) | () | () |
| 20. Emergency coordinator (265.55) | | |
| a. identify emergency coordinator | () | () |
| b. ensure qualifications of coordinator | () | () |
| 21. Emergency procedures (265.56) | () | () |
| <u>Manifest System, Recordkeeping, and Reporting</u> | | |
| <u>Subpart E:</u> | | |
| 22. Use of manifest system: (265.71) | | |
| a. procedures for processing each manifest | () | () |
| b. records of past shipments | () | () |
| 23. Manifest discrepancies (methods of detection) (265.72) | () | () |
| 24. Operating record: (265.73) | | |
| a. presence | (✓) | () |
| b. maintenance | (✓) | () |
| 25. Availability, retention and disposition of records (265.74) | (✓) | () |
| 26. Annual report (265.75) | (✓) | () |
| 27. Unmanifested waste report: (265.76) | | |
| a. procedures for filling out report | () | () |
| b. compliance file for reports | () | () |
| 28. Additional reports: (265.77) | | |
| Have any of the below ever been filed (Indicate with a ✓) | | |
| a. ___ releases, fires and explosions (265.77(a)) | | |
| b. ___ groundwater contamination (265.77(b)) | | |
| c. ___ facility closure (265.77(c)) | | |

Groundwater Monitoring
Subpart F:

N/A
✓

DIRECTION: If Subpart F is Not-Applicable, check here , then proceed to Subpart G.

- | | <u>YES</u> | <u>NO</u> |
|---|------------|-----------|
| 29. Applicability: (265.90) | | |
| a. check applicability (265.90(a)) | () | () |
| b. operation and maintenance of a system (265.90(b)) | () | () |
| c. waiver of requirement (265.90(c)) | () | () |
| 30. Groundwater monitoring system (265.91) | | |
| a. presence (265.91(a)) | () | () |
| b. number and placement of wells (265.91(a)(1)(2)) | () | () |
| c. maintenance of wells (265.91(c)) | () | () |
| d. well integrity (265.91(c)) | () | () |
| 31. Sampling and analysis: (265.92) | | |
| a. sampling and analysis plan (265.92(a)) | () | () |
| b. records of sampling and analysis (265.94(a)(1)) | () | () |
| 32. Preparation, evaluation and response: (265.93) | | |
| a. outline of water quality assessment program (265.93(a)) | () | () |
| b. adequacy of outline (265.93(a)-(f)) | () | () |
| 33. Recordkeeping and reporting: (265.94) | | |
| a. groundwater analysis records (265.94(a)(1)) | () | () |
| b. reports of groundwater monitoring information to Regional Administrator (265.94(a)(2)) | () | () |
| c. annual groundwater quality reports (265.94(a)(2)(ii)(iii)) | () | () |

Closure and Post-Closure
Subpart G:
Note:

- a. Sections 265.111-265.115 (which concern closure) apply to the owners and operators of all hazardous waste facilities; and
- b. Sections 265.117-265.120 (which concern post-closure care) apply to the owners and operators of all disposal facilities.

- | | <u>YES</u> | <u>NO</u> | <u>NA</u> |
|---|------------|-----------|-----------|
| 34. <u>Closure and post-closure:</u> (265.110 - 265.112) | | | |
| a. closure plan | (✓) | () | |
| b. adequacy of plan | (✓) | () | |
| 35. Time for closure: (265.113) | | | |
| a. 90 day closure requirements (265.113(a)) | (✓) | () | |
| b. six month closure requirements (265.113(b)) | (✓) | () | |
| 36. Disposal or decontamination of equipment (265.114) | (✓) | () | |
| 37. Certification of closure (265.115) | () | () | |
| 38. <u>Post closure care and use of property:</u>
(265.117) | | | () |
| a. post closure plan | () | () | |
| b. period of post closure plan | () | () | |
| c. plan and amendments approved (265.112) | () | () | |
| 39. Notice to local land authority (265.119) | | | |
| a. survey plat including records of all waste types and quantities of waste | () | () | |
| b. submitted to proper authorities | () | () | |
| 40. Notice in deed to property: (265.120) | | | |
| a. proper notification to potential purchasers | () | () | |

Financial Requirements
Subpart H:

- | | | | |
|---|-----|-----|--|
| 41. Liability for each facility (sudden, nonsudden act) Specify <u>amount</u> | (✓) | () | |
| 42. Effective date (facility specific) | () | () | |

*Financial Test -
Financial assurance
Corporate (✓)*

GENERATORS CHECKLIST

Celance
 Name _____ EPA I.D. _____ County _____
 Location _____ Contact Person _____ Date *12-15-83*
 Field Investigator _____

INSTRUCTIONS: In the space provided, check the appropriate response.

- | | <u>YES</u> | <u>NO</u> |
|---|------------|-----------|
| 1. EPA identification number, if applicable (262.12) | () | () |
| 2. Waste Volume (261.5) | | |
| a. *Small Generator (<1000 kg/Mo) <input type="checkbox"/> | | |
| b. *Large Generator (>1000 kg/Mo) <input checked="" type="checkbox"/> | | |
| (* Note: <u>Special limits on 261.33(e) list</u>) | | |
| 3. Briefly describe the plant operations and the type of waste generated. (Volume, form) _____ | | |
| 4. Where is the waste currently being disposed? _____ | | |
| 5. Check Manifest (262.20 - 262.23) | | |
| a. identification (I.D. code, name, address, date) | (X) | () |
| b. waste information (shipping description, hazard class, quantity and unit) | (X) | () |
| c. emergency information (immediate response information, special handling instructions, phone no.) | (X) | () |
| d. certification: "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA". | (X) | () |
| 6. Check Containers (262.30) | | |
| a. proper construction | (X) | () |
| b. leaks or corrosion | (X) | () |
| c. heat generation from incompatible wastes | (X) | () |

*Rechie Small,
 Env & Ind Hygiene
 Engineer*

~ 20 drums per month

*chlorinated
 celene Dope - Acetone*

*Flammable liquid
 Alcohol Isopropyl
 Methanol*

- Continued

- | | <u>YES</u> | <u>NO</u> |
|--|------------|-----------|
| 7. Labeling practices and marking (262.31 - 262.32) | | |
| a. DOT shipping description | (✓) | () |
| b. Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency. | | |
| Generator's Name and Address _____ | | |
| Manifest Document Number _____ | (✓) | () |
| 8. Placards for transport (262.33) | (✓) | () |
| 9. Check accumulation time of wastes: (262.34) | | |
| a. check records and dates | (✓) | () |
| b. check containers | (✓) | () |
| 10. Personnel training records: (265.16) | | |
| a. job titles (265.16(d)(1)) | (✓) | () |
| b. description of training (265.16(d)(2)) | (✓) | () |
| c. records of training (265.16(d)(3)) | (✓) | () |
| 11. <u>Preparedness and Prevention</u>
Subpart C: (265.30 - 265.37) | | |
| 1. Maintenance and operation of facility: (265.31) | | |
| a. evidence of fire, explosion, or contamination of the environment | () | () |
| 2. Required equipment: (265.32) | | |
| a. alarm system (265.32(a)) | (✓) | () |
| b. telephone or 2-way radio (265.32(b)) | (✓) | () |
| c. portable fire extinguishers, fire control, spill control equipment and decontamination equipment (265.32(c)) | (✓) | () |
| d. water of adequate volume for hoses, sprinklers or water spray system (265.32(d)) | (✓) | () |
| 3. Testing and maintenance of equipment (265.33) | | |
| a. testing and maintenance procedures | (✓) | () |
| b. condition of equipment | (✓) | () |

- Continued

	<u>YES</u>	<u>NO</u>
4. Access to communications or alarm systems (265.34) (unless exempt under 265.32)	(✓)	()
5. Required aisle space (265.35)	(✓)	()
6. Arrangements with local authorities (265.37) (Note 265.37(b))		
a. Attempted arrangements (265.37(a))	(✓)	()
b. Agreement with state emergency response teams (265.37(Q)(3))	()	(✓)
12. <u>Contingency Plan and Emergency Procedures</u> Subpart D: (265.50 - 265.56)		
1. Content of contingency plan (265.52)		
a. Does facility have a contingency plan (265.52)	(✓)	()
b. Local agreements (265.52(c))	(✓)	()
c. Emergency coordinator(s) (265.52(d)) (Phone No./qualifications)	(✓)	()
d. Emergency equipment list (265.52(e))	(✓)	()
e. Evacuation Plan (265.52(f))	(✓)	()
2. Copies of contingency plan (265.53)	(✓)	()
3. Emergency coordinator (265.55)		
a. identify emergency coordinator	(✓)	()
b. ensure qualifications of coordinator	(✓)	()
4. Emergency procedures (265.56)	(✓)	()
13. Recordkeeping practices:		
a. manifests (262.40)	(✓)	()
b. test results (262.40)	(✓)	()
c. annual reports (262.41)	(✓)	()
d. exception reports (262.42)	()	(✓)
14. International shipments (262.50)	()	(✓)

- Continued

15. Permit information:

a. Check all applicable permits held by the generator:

NPDES Permit SPCC Plan State Permit (Specify) _____

Air Permits Local Permit RCRA Disposer

RCRA Storer RCRA Treater

Other (Specify) N.C.I. Radiation Permit - low level

b. In compliance Yes No Unknown with respect to: _____
Regulation Name/#

16. Past regulatory actions:

None

Yes If yes, summarize: _____

17. Inspection activity (past or on-going):

None

Yes Air & water quality
Macklenburg Co

Date of Past Action _____

Performed by 02/1983
Macklenburg Co

Describe: _____
Air & Sewer

18. Remedial activity (past or on-going): (Check)

None

Yes

Describe: _____

1

TRANSPORTERS CHECKLIST

Name	EPA I.D.	County
Location	Contact Person	Date
Field Investigator:		
INSTRUCTIONS: In the space provided, check the appropriate response. NA - Not Applicable		

	<u>YES</u>	<u>NO</u>
1. EPA or authorized state identification number (263.11)	()	()
2. License number and current date on tag (263.10)	()	()
3. Maintenance of records for the specified three year time limit (263.22)	()	()
4. Copy of manifest or delivery document available (263.22)	()	()
Manifest containing at least: (262.21)		
a. name and address and identification code of transporter	()	()
b. name, address, identification code of generator	()	()
c. name, address, identification code of designated permitted facility	()	()
d. corresponding manifest document number	()	()
e. description and quantity of each hazardous waste	()	()
f. signature of subsequent transporters	()	()
g. signatures signifying proper delivery or reasons why delivery could not be certified	()	()
h. The following certification: This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.	()	()

- Continued

	<u>YES</u>	<u>NO</u>	<u>NA</u>
5. Containers properly labeled and marked (262.30 - 262.32)	()	()	
6. International shipments: 263.10(c)(1) and 262.50	()	()	()
a. record of date waste left U.S.	()	()	
b. presence of one signed copy in records	()	()	
7. Evidence of leaking or damaged containers (note appearance of truck also)	()	()	
8. Vehicles containing hazardous waste placarded properly (see 49 CFR 172.500)	()	()	
9. If it is required of vehicle or if vehicle contains more than 1,000 lbs. of hazardous waste, check to see that markings:	()	()	()
a. appear on both sides of vehicle	()	()	
b. are in letter contrasting in color with background	()	()	
c. are legible during daylight from 50 feet away	()	()	

Subpart I: Use and Management Of Containers

Name	EPA I.D.	County
Location	Contact Person	Date
Field Investigator		

INSTRUCTIONS: In the space provided, check the appropriate response.

	<u>Yes</u>	<u>NO</u>
1. Applicability (265.170)		
a. Covered by Subpart I	()	()
b. Exempt according to 265.170 (Specific section: 265.1)	()	()
2. Condition of Containers (265.171)		
a. Leakage	()	(X)
b. Evidence of past leakage	()	()
c. Repaired containers	()	()
3. Compatibility of Waste (265.172)		
a. Is the waste suitable for the container or liner?	(X)	()
b. Visual evidence of violation	()	(X)
c. Circle visual evidence of non-compliance: (leakage, corrosion, other _____) Specify		
4. Management of Containers (265.173)		
a. Closed during storage	(X)	()
b. Re-use of containers in compliance with DOT regulations	(X)	()
5. Inspections (265.174)		
a. At least weekly	(X)	()
6. Special requirements for ignitable or reactive waste (265.176)		
a. 15 meters (50 feet) from facility property line	(X)	()

- Continued

	<u>YES</u>	<u>NO</u>
7. Special requirements for incompatible waste	(✓)	()
a. & b. Compliance with 265.17(b), if applicable		
c. Separation, if applicable		

SUBPART J: TANKS CHECKLIST

Name	EPA I.D.	County
Location	Contact Person	Date
Field Investigator		
INSTRUCTIONS: In the space provided, check the appropriate response. NA - Not Applicable		

- | | <u>YES</u> | <u>NO</u> | <u>NA</u> |
|---|------------|-----------|-----------|
| 1. General operating requirements: (265.192) | | | |
| a. compatibility of waste type and tank
(ruptures, leaks, corrosion, etc.) (265.17(b),
265.192(b)) | () | () | |
| b. <u>uncovered tanks</u> : at least 60 cm (265.192(c))
(2 feet) freeboard <u>or</u>
containment structure (e.g. dike
or trench <u>or</u>
drainage control system <u>or</u>
diversion structure (standby tank) | () | () | () |
| c. Volume of tanks: volume of containment
(265.192(d)) | | | |
| 2. Waste analysis and trial test
procedures for and records of
waste analysis and trial tests (265.193) | () | () | |
| 3. Inspections: maintenance and
inspection of: (265.194) | | | |
| a. discharge control equipment (265.194(a)(1)) | () | () | |
| b. monitoring equipment (pressure and
temperature gauges) (265.194(a)(2)) | () | () | |
| c. level of waste in tank (265.194(a)(3)) | () | () | |
| d. tank construction materials (265.194(a)(4)) | () | () | |
| e. area immediately surrounding confinement
structures (265.194(a)(5)) | () | () | |

- Continued

	<u>YES</u>	<u>NO</u>
4. Closure plan present at site (265.197)	()	()
5. Ignitable or reactive waste properly stored (265.198)	()	()
6. Incompatible wastes properly stored (265.199)	()	()
7. Evidence of corrosion, leakage at seams, wet spots, dead vegetation	()	()

Subpart I: Use and Management Of Containers

Name	EPA I.D.	County
------	----------	--------

Location	Contact Person	Date
----------	----------------	------

Field Investigator

INSTRUCTIONS: In the space provided, check the appropriate response.

- | | <u>Yes</u> | <u>NO</u> |
|---|------------|-----------|
| 1. Applicability (265.170) | | |
| a. Covered by Subpart I | () | () |
| b. Exempt according to 265.170
(Specific section: 265.1) | () | () |
| 2. Condition of Containers (265.171) | | |
| a. Leakage | () | () |
| b. Evidence of past leakage | () | () |
| c. Repaired containers | () | () |
| 3. Compatibility of Waste (265.172) | | |
| a. Is the waste suitable for the container
or liner? | () | () |
| b. Visual evidence of violation | () | () |
| c. <u>Circle</u> visual evidence of non-compliance:
(leakage, corrosion, other _____)
Specify | | |
| 4. Management of Containers (265.173) | | |
| a. Closed during storage | () | () |
| b. Re-use of containers in compliance
with DOT regulations | () | () |
| 5. Inspections (265.174) | | |
| a. At least weekly | () | () |
| 6. Special requirements for ignitable or
reactive waste (265.176) | | |
| a. 15 meters (50 feet) from facility
property line | () | () |

- Continued

YES
()

NO
()

7. Special requirements for incompatible waste

a. & b. Compliance with 265.17(b), if applicable

c. Separation, if applicable



II. POLLUTANT CHARACTERISTICS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

000532

RECEIVED
EPA REGION IV

PLEASE PLACE LABEL IN THIS SPACE

NOV 18 11 29 AM '80

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 CELANESE FIBERS CO TECHNICAL CENTER

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)

2 HARDESTY, SUSAN ENV & SAFETY SU 704 554 3510

B. PHONE (area code & no.)

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 P.O. BOX 32414

B. CITY OR TOWN

4 CHARLOTTE

C. STATE

NC

D. ZIP CODE

28232

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 2400 ARCHDALE DR

B. COUNTY NAME

MECKLENBURG

C. CITY OR TOWN

CHARLOTTE

D. STATE

NC

E. ZIP CODE

28210

F. COUNTY CODE (if known)

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND					
7	2	8	2	4	7	2	8	2	3
(specify) Synthetic Organic Fibers				(specify) Cellulosic Fibers					
C. THIRD				D. FOURTH					
7	2	8	2	1	7				
(specify) Synthetic Resins				(specify)					

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?	
8 CELANESE FIBERS CO										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)									
F = FEDERAL	M = PUBLIC (other than federal or state)	P (specify)								7	0	4	5	5	4	2	0	0	0
S = STATE	O = OTHER (specify)																		
P = PRIVATE																			

E. STREET OR P.O. BOX									
P O BOX 3 2 4 1 4									

F. CITY OR TOWN					G. STATE	H. ZIP CODE	IX. INDIAN LAND			
B CHARLOTTE					NC	2 8 2 3 2	Is the facility located on Indian lands?			
								<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)						
9	N			9	P					
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)						
9	U			9		0.7	-	0.2	4	5
C. RCRA (Hazardous Wastes)				E. OTHER (specify)						
9	R			9		0.7	-	0.1	1	0
				(specify) Meck County Air Quality Section						
				(specify) Meck County Air Quality Section						

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Synthetic fiber research and development. Produce pilot plant quantities of polyester and acetate fibers and subject them to typical processing steps on a laboratory scale.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
				11/11/80	

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--



**U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION**
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
FWCT0000908117

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

- A. FIRST APPLICATION** (place an "X" below and provide the appropriate date)
1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)
2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
57	01	01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete item 1 above)

1. FACILITY HAS INTERIM STATUS
2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
		UNIT OF MEASURE CODE			UNIT OF MEASURE CODE
GALLONS		G	ACRE-FEET		A
LITERS		L	HECTARE-METER		F
CUBIC YARDS		Y	ACRES		B
CUBIC METERS		C	HECTARES		D
GALLONS PER DAY		U			
LITERS PER DAY		V			
TONS PER HOUR		D			
METRIC TONS PER HOUR		W			
GALLONS PER HOUR		E			
LITERS PER HOUR		H			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	40,000	G		7				
2	S 0 2	2,500	G		8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)

T/A	C
	1

FOR OFFICIAL USE ONLY

W	DUP	T/A	C
		2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES					
	23	24	25	26			1. PROCESS CODES (enter)		2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
							27 - 29	27 - 29	27 - 29	27 - 29		
1	F	0	0	1	500	P	S	0	1	S	0	2
2	F	0	0	2	5,000	P	S	0	1	S	0	2
3	F	0	0	3	2,000	P	S	0	1	S	0	2
4	F	0	0	5	2,000	P	S	0	1	S	0	2
5	P	0	1	6	10 (one time disposal)	P	S	0	1			
6	P	0	2	2	5	P	S	0	1			
7	P	0	2	9	10 (one time disposal)	P	S	0	1			
8	P	0	5	3	1	P	S	0	1			
9	P	0	7	5	10 (one time disposal)	P	S	0	1			
10	P	0	9	8	1	P	S	0	1			
11	P	1	0	4	10 (one time disposal)	P	S	0	1			
12	P	1	0	6	10 (one time disposal)	P	S	0	1			
13	P	1	0	8	10 (one time disposal)	P	S	0	1			
14	P	1	2	0	10 (one time disposal)	P	S	0	1			
15	U	0	0	2	500	P	S	0	1			
16	U	0	0	3	10 (one time disposal)	P	S	0	1			
17	U	0	0	4	10 (one time Disposal)	P	S	0	1			
18	U	0	0	7	10 (one time disposal)	P	S	0	1			
19	U	0	1	3	10 (one time disposal)	P	S	0	1			
20	U	0	1	9	5	P	S	0	1			
21	U	0	2	2	10 (one time disposal)	P	S	0	1			
22	U	0	3	1	100	P	S	0	1			
23	D	0	0	1	20,000	P	S	0	1	S	0	2
24	D	0	0	2	20,000	P	S	0	1	S	0	2
25	D	0	0	3	1,000	P	S	0	1			
26	D	0	0	0	10,000	P	S	0	1	S	0	2

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)												
8											T/A	C
F												6
1	2	3	4	5	6	7	8	9	10	11	12	

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

35 08 04 0

080 51 054

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E											
3. STREET OR P.O. BOX											
4. CITY OR TOWN						5. ST.			6. ZIP CODE		
F											
G											

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED



11/11/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

A.I.D. NUMBER (enter from page 1)

12	13	14	15
			1

FOR OFFICIAL USE ONLY

9	10	11	12
W			
13	14	15	16
		2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTENO (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES								
	22	23	24	25			1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
							27 - 28	29 - 30	31 - 32	33 - 34	35 - 36	37 - 38	39 - 40	41 - 42	43 - 44
1	U	0	3	7	1,000	P	S	0	1						
2	U	0	4	4	3,000	P	S	0	1						
3	U	0	4	8	5,000	P	S	0	1	S	0	2			
4	U	0	5	2	500	P	S	0	1						
5	U	0	5	6	10	P	S	0	1						
6	U	0	5	7	10	P	S	0	1						
7	U	0	7	5 10	(one time disposal)	P	S	0	1						
8	U	0	7	7 10	(one time disposal)	P	S	0	1						
9	U	0	8	0 10	(one time disposal)	P	S	0	1						
10	U	1	0	2	100	P	S	0	1						
11	U	1	0	3 10	(one time disposal)	P	S	0	1						
12	U	1	0	8	100	P	S	0	1						
13	U	1	1	0 10	(one time disposal)	P	S	0	1						
14	U	1	1	2	10	P	S	0	1						
15	U	1	1	5 10	(one time disposal)	P	S	0	1						
16	U	1	1	7	10	P	S	0	1						
17	U	1	2	2	100	P	S	0	1						
18	U	1	2	3	10	P	S	0	1						
19	U	1	2	4 10	(one time disposal)	P	S	0	1						
20	U	1	2	5 10	(one time disposal)	P	S	0	1						
21	U	1	3	3 10	(one time disposal)	P	S	0	1						
22	U	1	3	4 10	(one time disposal)	P	S	0	1						
23	U	1	3	5	10	P	S	0	1						
24	U	1	4	7 10	(one time disposal)	P	S	0	1						
25	U	1	5	1	1	P	S	0	1						
26	U	1	5	4	1,000	P	S	0	1						

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

5																				T/A	C
F																					6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

63	64	65	66	67	68	69	70	71		

72	73	74	75	76	77	78	79			

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C																				
E																				

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C																				
F																				

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

A.I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
										W DUP 2 DUP									

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
27	28	29	30	31	32	27	29	27	29	27	29	27	29
1	U 1 5 9	500	P	S 0 1									
2	U 1 6 5	10 (one time disposal)	P	S 0 1									
3	U 1 6 9	10 (one time disposal)	P	S 0 1									
4	U 1 8 8	100	P	S 0 1									
5	U 1 9 0	10 (one time disposal)	P	S 0 1									
6	U 1 9 6	500	P	S 0 1									
7	U 1 9 7	10 (one time disposal)	P	S 0 1									
8	U 2 0 1	100	P	S 0 1									
9	U 2 1 0	1,000	P	S 0 1									
10	U 2 1 1	100	P	S 0 1									
11	U 2 1 3	10 (one time disposal)	P	S 0 1									
12	U 2 1 9	10	P	S 0 1									
13	U 2 2 0	100	P	S 0 1									
14	U 2 2 5	10 (one time disposal)	P	S 0 1									
15	U 2 2 6	100	P	S 0 1									
16	U 2 2 8	10	P	S 0 1									
17	U 2 3 1	10 (one time disposal)	P	S 0 1									
18	U 2 3 9	100	P	S 0 1									
19	U 2 3 5	10	P	S 0 1									
20	U 0 4 5	100	P	S 0 1									
21													
22													
23													
24													
25													
26													

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)													
3												T/J/A	C
F													6
2													

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
65	66	67	68	69	70	72	74	75	76	77	79

VIII. FACILITY OWNER

- A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.
- B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER						2. PHONE NO. (area code & no.)					
E						F					
3. STREET OR P.O. BOX						4. CITY OR TOWN					
C						G					
5. ST.						6. ZIP CODE					
F						G					

IX. OWNER CERTIFICATION

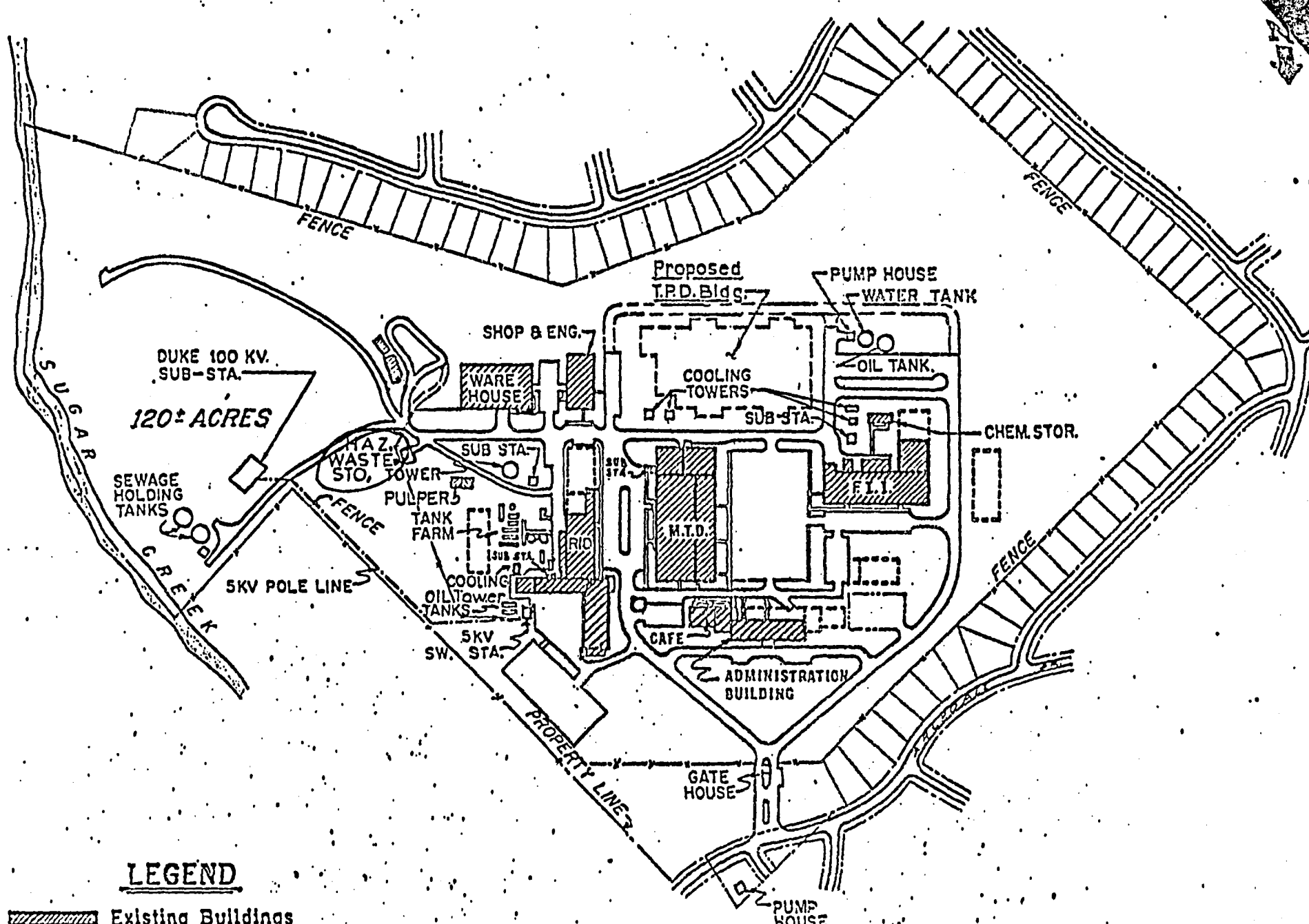
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED


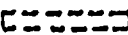


X. OPERATOR CERTIFICATION

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A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED



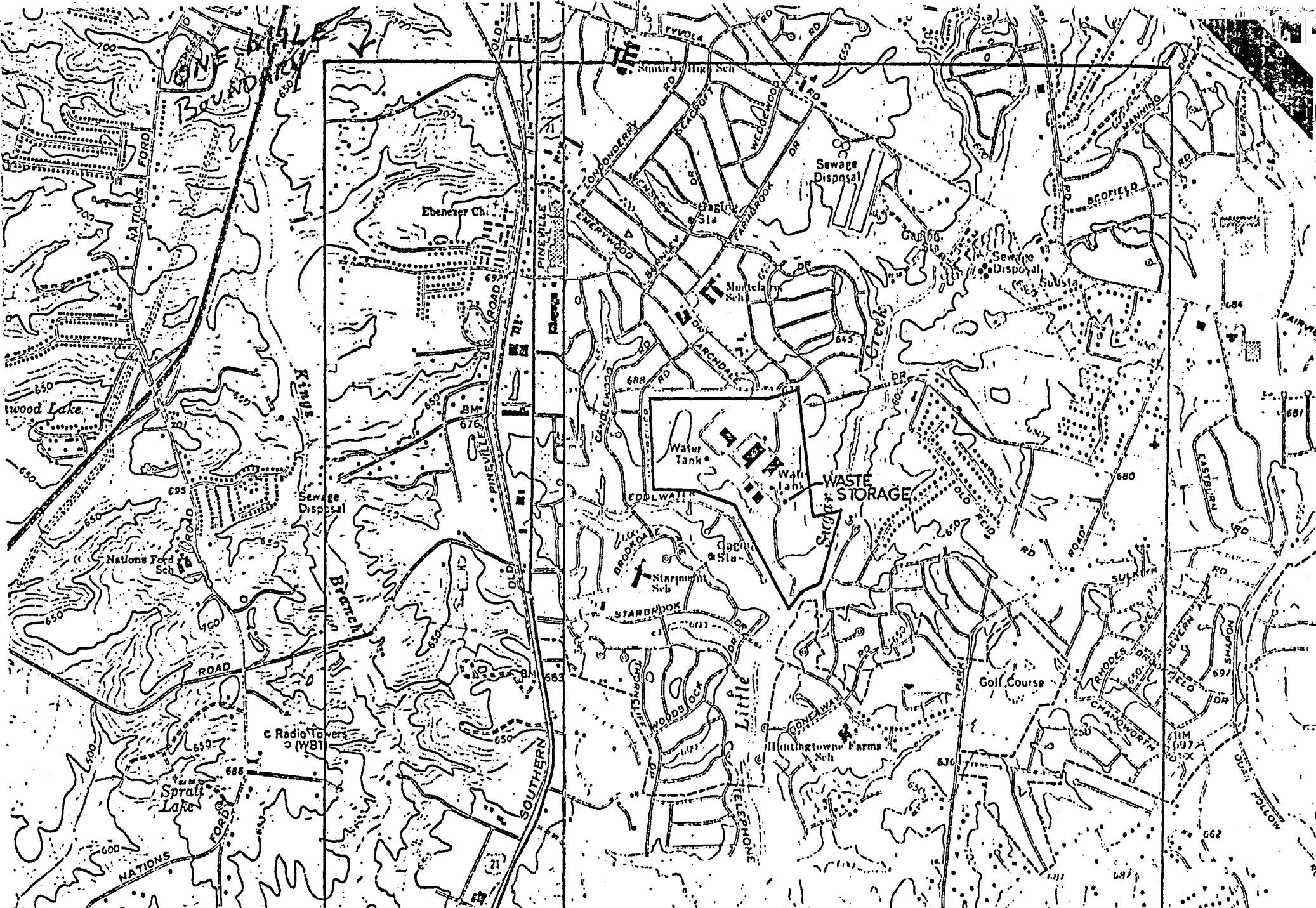
LEGEND

-  Existing Buildings
-  Future Buildings
-  Existing Roads & Parking
-  Future Roads & Parking

1-23-75

Water Site Plan
ARCHDALE DRIVE

SCALE: 1"=440'



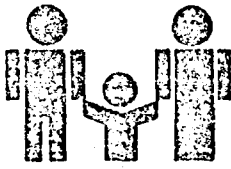
509 1:100,000 E 80° 52' 30" 1:100,000 1111 513 28 MI TO NC 514 515

ROAD CLASSIFICATION

- Primary highway, all weather, hard surface
- Light-duty road, all weather, improved surface
- Secondary highway, all weather, Unimproved road, fair or drv

Mapped, edited, and published by the Geological Survey
 Control by USGS, USCGS, and North Carolina Geologic

★
 MN



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

Rick

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 18, 1982

Ms. Susan J. Hardesty
Celanese Fibers Company Technical
Center
P.O. Box 32414
Charlotte, NC 28232

Dear Ms. Hardesty:

On December 2, 1981 Mr. Jerry Rhodes of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. The following violations were noted:

- (1) Contingency Plan: Copies not submitted to local authorities (265.53).
- (2) Contingency Plan: Emergency coordinator not properly identified (265.55).
- (3) Closure Plan: Not adequate (265.112).
- (4) Containers: Some open during storage (265.173).

A compliance date of January 20, 1982 was established.

If you have any questions concerning this matter, please contact Mr. William Paige, Environmental Chemist at (919) 733-2178.

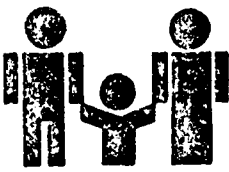
Sincerely,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: Mr. Jerry Rhodes
Mr. Rick Doby





Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

Rick

February 4, 1982

MEMORANDUM

TO: O. W. Strickland, Head
Solid & Hazardous Waste Management Branch

FROM: Jerry Rhodes *JRH*
Environmental Chemist

SUBJECT: Follow-up Inspection
Celanese Fibers Company Technical Center
P.O. Box 32414
Charlotte, NC 28232
EPA ID #NCD000608117
Contact: Susan J. Hardesty, Environmental & Safety Supervisor

A follow-up inspection was conducted at the Celanese Fibers Company Technical Center in Charlotte on February 3, 1982. The four violations noted during the initial inspection on December 3, 1981 had been corrected. The Celanese Fibers Company Technical Center is now in compliance with RCRA Interim Status Standards.

JR:lc

cc: Mr. Rick Doby



Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

Rich

February 11, 1982

Ms. Susan J. Hardesty
Celanese Fibers Company
Technical Center
P.O. Box 32414
Charlotte, NC 28232

Dear Ms. Hardesty:

A follow-up inspection conducted by Mr. Jerry Rhodes on February 3, 1982 indicated that the four violations noted during the December 3, 1981 RCRA inspection had been corrected.

Thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

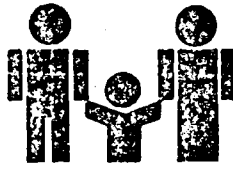
Sincerely,

O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section

OWS:nlc

cc: ~~Mr.~~ Jerry Rhodes
Mr. Rick Doby





Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

January 7, 1982

MEMORANDUM

TO: O. W. Strickland, Head
Solid and Hazardous Waste Management Branch

FROM: Jerry Rhodes *JHR*
Environmental Chemist

SUBJECT: Interim Status Inspection
Celanese Fibers Co. Technical Center
Charlotte, N.C. 28232
EPA IS # NCD000608117
Contact: Susan J. Hardesty, Environmental and Safety Supervisor

An RCRA Interim Status compliance inspection was conducted at the Celanese Fibers Company Technical Center on December 2, 1981. The following violations were noted during the inspection:

- (1) Contingency Plan: Copies not submitted to local authorities (265.53).
- (2) Contingency Plan: Emergency coordinator not properly identified (265.55).
- (3) Closure Plan: Not adequate (265.112).
- (4) Containers: Some open during storage (265.173).

A compliance date of January 20, 1982 was agreed upon by Ms. Susan Hardesty and myself.

JR:dwm

cc: Rick Doby

RCRA INSPECTION REPORT

1. Facility Information

Celanese Fibers Co. Technical Center
2400 Archdale Drive 28210
P. O. Box 32414
Charlotte, N. C. 28232
Mecklenburg County
EPA ID # NCD000608117

Ext
#4

→ Nation Ford Rd
off turn left turn left
IT7 North from
Nation Ford Rd
1 1/2 mile

2. Responsible Official

Susan J. Hardesty, Environmental and safety Supervisor (704) 554-3510 12-15-83

9-10:00

3. Survey Participants

Susan J. Hardesty, Environmental and Safety Supervisor
Jerry Rhodes, Environmental Chemist, DHR
Rusty Rozzelle, Environmentalist, Mecklenburg County

4. Date of Inspection

December 2, 1981
1:00 - 3:00 PM

5. Applicable Regulations

40 CFR Parts 262 and 265, FR May 19, 1980 and amendments

6. Purpost of Survey

An RCRA Interim Status compliance inspection was conducted at the Celanese Fibers Company Technical Center by the N. C. Solid and Hazardous Waste Management Branch. The scope of the inspection was comprehensive including a site survey and record review. Regulatory requirements covered those contained in 40 CRF Parts 262, Generator Standards and 265, General Facility Standards including tanks and containers.

7. Facility Description

Celanese Fibers Company Technical Center does research and development of synthetic fibers. Pilot plant quantities of polyester and acetate fibers are produced and subjected to typical processing steps on a laboratory scale. The Center is located on 120 acres in south Charlotte at 2400 Archdale Drive. Security fencing with guarded gates surround 80 acres. This site is about one mile east of Pineville Road (US 521).

The Part A for the Technical Center lists 72 hazardous wastes. However, 33 are for a one-time disposal only as the laboratories are being cleaned of old chemicals. Twenty five others are listed at 100 or less pounds per year. Remaining wastes and estimated annual quantities:

<u>EPA No.</u>	<u>Pounds/year</u>
F001	500
F002	500
F003	2000
F005	2000
U002	500
D001	20000
D002	20000
D003	1000
D000	10000
U037	1000
U044	3000
U048	5000
U052	500
U154	1000
U159	500
U196	500
U210	1000

Records for the past year indicate that 12 to 20 drums/month have been generated. These have been disposed of by ABCO, SCD003360393 and Mitchell Systems, NCT380010330. The high volume wastes are generated in various labs, drummed at collection stations, and transferred to the storage area, a shed was just completed, in less than 90 days. Drums are marked with a letter code for each waste category. I recommended that more identification would be preferred. Drum contents are transferred into tankers by the transporters.

A 2500 gallon tank listed on the Part A is used to contain a process waste water containing traces of a carcinogen. This water is handled as a hazardous waste and will be analyzed before disposal (possibly incinerated).

The Technical Center has two air permits from Mecklenburg County. These are Nos. 07-0245 and 07-0110

8. Documentation of Site Deficiencies

The following violations were noted during the inspection.

- (1) Copies of contingency plan not submitted to local authorities (265.53).
- (2) Emergency coordinator not properly identified (265.55).
- (3) Closure plan not adequate (265.112).
- (4) All containers not closed during storage (265.173).

9. Compliance Schedule

A compliance date of January 20, 1982 was agreed upon by Ms. Susan Hardesty and myself.

**INSPECTION FORM FOR INTERIM STATUS STANDARDS FOR
OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT
FACILITIES**

Celanese Fibers
Technical Center NCT000608117 Mecklenburg
 Name of Site EPA I.D. County
Charlotte
 Location Susan J. Hardesty
 Signature of Facility Contact
12-2-81 Jerry Rhoades
 Date Signature of Inspector(s)

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

	<u>C</u>	<u>NC</u>	<u>NA</u>	<u>Violation(s)</u>
1. GENERAL	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. GENERAL FACILITY STANDARDS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. PREPAREDNESS AND PREVENTION	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>265.53</u> <u>265.55</u>
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. GROUND-WATER MONITORING	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. CLOSURE AND POST-CLOSURE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>265.112</u>
8. FINANCIAL REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
9. USE AND MANAGEMENT OF CONTAINERS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>265.173</u>
10. TANKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. SURFACE IMPOUNDMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
12. WASTE PILES	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
13. LAND TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
14. LANDFILLS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
15. INCINERATORS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
16. THERMAL TREATMENT	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
17. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
18. UNDERGROUND INJECTION	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Gen., TSDF YES NO
 Imminent hazard () ()

DHS Form 3010 (7-81)
 SOLID & HAZARDOUS WASTE A compliance date of 1-20-82
 was agreed upon.

INSTRUCTIONS FOR FORM USAGE

The below instructions are applicable to Interim Status Inspection Forms Numbers _____

Purpose: To provide information on the compliance status of facilities handling hazardous waste. A written summary will be developed from this data and forwarded to the facility.

Preparation: A field inspector will prepare one copy of the appropriate inspection form(s) on each facility to be inspected. Information regarding county, name, address, and E.P.A. I.D. number may be completed prior to the site visit.

Distribution: The field inspector should write a written summary and forward it to the below address within one week after the site visit.

Mailing: Mr. O. W. Strickland, Head
Solid & Hazardous Waste Management Branch
Environmental Health Section
Department of Human Resources
P.O. Box 2091
Raleigh, North Carolina 27602

Retention: It is recommended that the inspection report be retained as a part of a facilities permanent record.

Additional forms may be ordered from: Solid and Hazardous Waste Management Branch
Environmental Health Section
Department of Human Resources
P.O. Box 2091
Raleigh, North Carolina 27602