RCRA RECORDS CENTER
FACILITY Atlantic Wire
I.D. NO. CTD001161181
FILE LOC. R-1C
OTHER

HAZARDOUS WASTE INSPECTION CHECKLIST

Site:

Name: Atlantic Wire Co.

Location: 1 Church St.
Branford 06405

Phone No: ( ) 488-8331

ID No: CTD001161181

Contact & Title: Robert Wilson, pl. eng.

Mailing Address (if different from location):

Inspector(s): Hassler

Inspection Date: 9/22/83

Inspection Category:

RCRA Notifier as:

Generator: ✓

Transporter:

TSDF: (notified, but aren't)

Part A Application ___ No, ___ Y

UIC:

Inventory:

Complaint No:

Other (describe):

RDMS DocID 110214

CHARACTERIZATION OF SITE ACTIVITY

A) Date Established at Present Location: 1906

B) No. of Employees, Shifts: ≈ 230

C) Type of Activity: drawing + coating of wire.

D) Products: coated + uncoated steel wire.

E) Processes: All processes listed in 10/12/82 report still accurate, except: Chromic acid no longer used, very little Cu plate used.
Process summary: wire drawing; apply coatings of lime, tin, copper + liquor. Pickle with H_2SO_4, alkaline cleaning. Wire prep. in HCl. Small vol. degreasing with Thundersol (mineral spirit). Heat treating + Potassium permanganate treatment (no CN).
Wastewater treatment system is simple neutralization. Neutralized slurry trucked to Branford Sewage plant for lagoon dewatering.
Tanks listed in 10/12/82 report.

F) Water Supply (if well(s) give approx. location): City; plus one well unused, too saline.

G) Septic System(s), Municipal Sewer(s), Drywell(s): Sanitary sewer; NPDES to Branford River for treated effluent + cooling water.

II WASTE PROFILE

Type of Waste	Amount/Frequency	On-Site, Temporary Storage/TSD	Transporter	Off-site TSD

1.) delisted MeOH sludge; 42,000 gal/week; hauled by Atlantic Trucking Co. to Branford Sewage plant for lagoon dewatering. Ultimately to Branford landfill.

2.) waste oil (crankcase, lubes, water-sol., Thundersol); 10 dr./yr.; hauled by National Oil 1-2/yr.

HCl now metered into treatment system. Liquracon not used since Wilson began employment in April '83.

No longer gen. Chromic acid waste.

Liquracon used for emergencies only, Wilson claims not used yet in 1983.

III INVENTORY

A) Has this site notified EPA under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 PL 96-510 (commonly known as Superfund): ✓ No, ___ Yes: (Attach copy of Notification, if available)

B) Prior to the November 19, 1980 Implementation of RCRA Where; When; What type; Amount/Frequency; How long; and by Who (Transporters, Facilities, Etc.) were wastes disposed of Off-site:

See 10/12/82 report.

C) Is there any evidence of On-site disposal? ___ No, ✓ Yes.

Give Approximate Location; Type; Amount/Frequency; Length of Time On-site disposal has been used, etc. (Specify any historical On-site disposal):

Water-soluble coolant overflowing to street & storm sewer.

IV RECORDS

62.11/
5-54cc(c)-
a)(3)(A)-7,
-9(3)(3)

aa) Hazardous Waste Determination

1) Performed: ?

2) Records Maintained: Yes, partial re: delisting.

IV RECORDS

262.21/ 25-54cc(c)-5 a) Manifest Claim none used, no haz. shipments made.

1) Document No.: _____

2) Generator ID, name, address: _____

3) Transporter(s) ID, name, address: _____

4) Continuing Transporter ID, Name, Address: _____

5) TSD Facility ID, name, address: _____

6) Waste Type/ Quantity: _____

7) Date Shipped: _____

8) Delivered: _____

262.50/ 25-54cc(c)- i) International Shipping Manifest: _____

262.42/ 25-54cc(c)-6 ii) Exception Report: _____

265.13/ 25-54cc(c)-26 b) Waste Analysis Plan NONE, told to rescind TSDF status or devise.

1) Plan on site: _____

2) Plan should include (a) parameters: _____

(b) test methods: _____

(c) sampling methods: _____

(d) frequency: _____

3) Copy of Results: _____

265.15/ 25-54cc(c)-28 c) Inspection Schedule and Log NONE, except for treatment system.

1) Are inspections conducted: of treatment system.

2)* Written inspection schedule: _____

3) Inspection Log: YES, " "

(A) Daily - loading and unloading of areas subject to spills: _____

- discharge control equipment in tanks: _____

- incinerator system, thermal treatment equipment,

- chem/phys/bio. treatment equipment: _____

- freeboard level of surface impoundments: _____

acid wastes are in-process until neutralized on-site.

* Required for Temporary Storage

265.15/
25-54cc(c)-28

c) Inspection Schedule and Log (continued) NONE, except for treatment system.

(B) Weekly - physical conditions of containers: _____

- physical conditions of tanks: _____
- physical conditions of surface impoundments: _____
- physical conditions of chem/phys/bio. treatment facility: _____

265.16/
25-54cc(c)-29

*d) Personnel Training Records NONE, told to devise.

1) Job titles/position description and name of employee

_____

_____

2) Description of training: _____

3) Records of training: _____

4) Training completed: _____

*e) Contingency Plan NONE, told to devise.

265.53/
25-54cc(c)-31

1) Plan on site: _____

265.53/
25-54cc(c)-31

2) Plan to local authorities: _____

265.52/
25-54cc(c)-31

3) Content of Plan: _____

a) Emergency plan: _____

b) Local authority arrangements: _____

c) Identify emergency coordinator: _____

d) List of emergency equipment _____

e) Evacuation plans: _____

f) Closure and Post-closure Plans; Cost Estimates NONE, told to rescind TSDF status or devise.

265.112, .113, .114, .115/
25-54cc(c)-34

i) Closure Plan (TSD Facilities) -

a) Plan on site:

b) Does plan include:

1) Schedule of partial closure if applicable: _____

2) Estimate of maximum inventory of waste in storage or treatment at given time: _____

3) Schedule for final closure & an estimate of the expected year of closure: _____

4) Description of steps needed to decontaminate facility equipment: _____

5) Total time required for closure: _____

6) Certification of closure: _____

*Required for Temporary Storage

265.117, .118/ 25-54cc(c)-34

2) Post-closure Plan (disposal facilities only) N/A

a) Plan on site: _____

b) Does plan identify and include frequency of: _____

o planned groundwater monitoring: _____

o planned maintenance & security activities: _____

o name, address and phone number of Post-closure contact: _____

_____

c) Length of Post-closure period identified: _____

265.142/ 25-54cc(c)-35

3) Closure Cost Estimate (TSD facilities) NONE, told to rescind TSDF status or devise.

a) Estimate on site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Closure Plan changed?

d) If answer to c is yes, has cost estimate changed?

265.144/ 25-54cc(c)-35

4) Post-closure Cost Estimate (disposal facilities only) N/A

a) Estimate on-site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Post-closure plan changed?

d) If answer to c is yes, has cost estimate changed?

265.73/ 25-54-cc(c)-32

g) Operating Records NONE, told to rescind TSDF status or devise.

1) Records on site: _____

2) Description, quantity, method and dates of disposal: _____

_____

3) Location on-site and manifest number: _____

_____

4) Results of waste analysis: _____

5) Record of any incidents requiring use of contingency plan: _____

_____

6) Records and results of inspections: _____

_____

7) Closure and post-closure cost estimates if needed: _____

B. Inspection

265.14/
25-54cc(c)-27

1) Site Security

a) 24 hour surveillance system: No

b) or Artificial or natural barrier: fence; wastes indoors

c) and Means to control entry: YES

d) Danger sign posted at each entrance legible at 25': NO

265.30-.37/
25-54cc(c)-30

**2) Site Preparedness/Prevention

a) Internal communication/alarm: intercoms

b) Telephone/2-way radio: phones

c) Portable fire control equipment: yes

d) Adequate water for fire control: yes

e) Testing and Maintenance of equipment: ?

f) Adequate aisle space: N/A

g) Access to equipment: ?

265.170-177/
25-54cc(c)-38

3) Containers No drums of hazardous waste.

Leaks _____

Ruptures _____

Corrosion _____

Closed Except in use _____

Heat/Pressure _____

50' bufferzone for I and R wastes:

I = Ignitable _____; R = Reactive _____

No smoking signs near I or R waste _____

Separation of incompatible wastes _____

Evidence of spills _____

262.30-.34/
25-54cc(c)-8

Pretransport requirements: packaging _____

labelling _____

marking _____

placarding _____

Date of waste Accumulation _____

*NYR Check for impermeable base under containers, any drains, secondary containment _____

*NYR - Not yet regulated by EPA, however, required by 25-54cc(c)-38(c)(3)

**Required for Temporary Storage

265.190-.199/ 25-54cc(c)-39

4) Tanks — None, but process tanks might get pumped out as waste on occassion.

Leaks _____

Ruptures _____

Corrosion: Check valves, piping controls for signs of corrosion _____

2' freeboard or containment _____

Heat/pressure _____

Evidence of spills _____

Inflow and outflow controls _____

Continuous Inflow _____ Means to stop flow? _____

Special Requirements for I and R wastes _____

265.220-.230/ 25-54cc(c)-40

5) Surface Impoundments (Pits, Ponds and Lagoons) — N/A

Protective Cover on Dikes _____

2' freeboard _____

Special requirements for I and R waste _____

Evidence of fire, explosion - leak _____

*NYR Liner _____

265.90-.94/ 25-54cc(c)-33

Groundwater Monitoring _____

265.250-.257/ 25-54cc(c)-41

6) Waste Piles — N/A

Wind erosion control _____

Prevention of leachate from pile (if hazardous) _____

Special requirements for I and R waste _____

Evidence of fire, explosion, leak _____

Separation of incompatible wastes _____

Waste analysis _____

265.340/ 25-54-cc(c)-45
265.382/ 25-54cc(c)-48

7) Incinerators/Thermal Treatment — N/A

a) Steady State conditions _____

b) Inspect combustion and emission control instruments every 15 minutes _____

c) Observe stack plume hourly _____

d) Waste analysis _____

*NYR - Not yet regulated

7) Incinerators/Thermal Treatment (continued) N/A

1) Heating value of waste _____

2) Organic halogen content _____

3) Sulfur content _____

4) Lead concentrations _____

5) Mercury concentrations _____

e) Evidence of leaks or spills (pumps, valves, conveyors and pipes) _____

f) Daily Inspection of Emergency shutdown controls and Alarm systems _____

g) Special Requirements for incompatible wastes _____

265.272-265.282/ 25-54cc(c)-47

8) Phys/Chem/Bio. Treatment N/A

a) Leaks _____

b) Ruptures _____

c) Corrosion _____

d) Waste cut-off _____

e) Waste analysis _____

f) Special Requirements for I and R waste _____

g) Special Requirements for incompatible wastes _____

265.272-265.282/ 25-54cc(c)-42

9) Land Treatment N/A

a) Approval document _____

*b) Run-on diversion _____

*c) Run-off collection; Treat if necessary _____

d) Waste Analysis _____

e) Presence of food chain crops, if so, refer to 265.276 _____

f) Unsaturated zone monitoring plan _____

g) Unsaturated zone waste analysis _____

h) Records of application date, rates, quantities and location of waste _____

i) Special requirements for I and R wastes _____

j) Special requirements for incompatible wastes _____

265.90-.94/ 25-54cc(c)-33

*k) Groundwater Monitoring _____

*November 19, 1981

.02-.315/ 10) Secured Landfills N/A
cc(c)-43

*a) Run-on diversion _____

*b) Run-off collection; Treat if necessary _____

c) Wind dispersion controlled _____

d) Records of all dimensions, locations, and contents _____

e) Special Requirements for I and R wastes _____

f) Special Requirements for Incompatible Wastes _____

*g) Special Requirements for liquids _____

*h) Reduction in volume of empty containers _____

*i) Groundwater Monitoring _____

5.90-.94/
-54cc(c)-33

-54cc(c)-44 11) Engineered Landfills N/A

a) Minimum area exposed to direct precipitation: _____

b) Run-on diversion: _____

c) Run-off collections; Treat if necessary: _____

d) Wind dispersion controlled: _____

e) Prohibited Materials: present: _____

f) Surveying and Recordkeeping: _____

25-54cc(c)-33 g) Groundwater Monitoring: _____

Subpart R/ 12) Underground Injection N/A
25-54cc(c)-43 Prohibited, for hazardous waste, in Connecticut.

*November 19, 1981

FINANCIAL REQUIREMENTS

*(TSDF's Only)

13. Financial Assurance: NONE, told to devise or rescind TSDF.

(Fed) 265.143 a. Closure

Type of mechanism _____
(trust fund, surety bond, letter of credit, insurance, financial test)

Amount of coverage $_____
(should be ≥ cost estimate)

Comments:

265.145 b. Post-Closure

Type of mechanism _____

Amount of coverage $_____

Comments:

14. Liability Insurance:

265.147 a. Sudden (all TSD facilities)

Type of mechanism _____
(insurance, financial test)

Amount of coverage $_____

Comments:

b. Nonsudden (surface impoundments, landfills, and land treatment facilities)

Type of mechanism _____

Amount of coverage $_____

Comments:

* Incorporated by reference into the Connecticut regulations in section 35 of 25-54cc(c).
Federally owned facilities are exempt from financial requirements.

see pg. 12

C. Requests for Information Told to eliminate oily discharge. Told to consider rescinding TSDF status, or else devise all appropriate paperwork. Are currently in process of delisting sludge (FeO_2), consultant: Camp & Assoc. Told to devise generator paperwork, to cover occassional tank cleanings & conc. solutions not treated on-site.

D. Photos Taken

NONE

E. Samples Taken

NONE here, but see Complaint #337.

F. Potential for Imminent Hazard, Air, or Water Discharge Violations

Water-soluble coolant running out of outdoor sump to road gutter, ultimately to city storm sewer on Church St.

G. Proximity to Residential Area, Surface Water, Recharge Zone, etc.

Area urban, houses densely scattered along North, East & West, river to South. Also old industries along southwest region, including Atlantic Trucking Co.

H. ADDITIONAL NOTES

Water-soluble coolant leak: floor troth along building's outside, receives roof drainage & pipes to open pit drain outdoors along Church St. A 1000 gal. water-soluble coolant tank recirculates machine coolants. This tank is in-ground, outside of building, also along Church St. A pipe off this tank is apparently broken, and when tank gets near full some coolant escapes into the floor troth leading to storm water drain. This drain overflows and/or plugs up during rainy weather, and coolant & water flow to Church St. gutter, running west to nearest catch basin.

Note: Mr. Wilson stated he thought this problem was corrected, and wondered if the recurrence might be due to a cross-connection of pipes indoors, rather than a broken pipe.