



NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT



February 23, 1999

1

JAMES B. HUNT JR.  
GOVERNOR

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION  
Docket # 99-109

WAYNE McDEVITT  
SECRETARY

Mr. Gabby Smith  
Brite-Sol Services, Inc.  
1200 Exchange Street  
Charlotte, N.C. 28108



NCR 000 000 414

WILLIAM L. MEYER  
DIRECTOR

Dear Mr. Smith:

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (Section) was authorized to operate the State Resource Conservation Recovery Act (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. Brite-Sol Services, Inc. of Charlotte, North Carolina, is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262 adopted by reference at 15A NCAC 13A .0107 and 40 CFR 268 adopted by reference at 15A NCAC 13A .0112.

On December 8, 1998, Mr. Joseph Parker, Waste Management Specialist and Mr. Brent Rockett, Waste Management Specialist with this Office inspected your facility for compliance with the North Carolina Hazardous Waste Management Rules. During that inspection the following violations were noted:

- A. 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, states that 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 and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4).
1. 40 CFR 265.16(c), adopted by reference at 15A NCAC 13A .0110, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Brite-Sol Services, Inc. is in violation of 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.16(c), adopted by reference at 15A NCAC 13A .0110, in that they

failed to provide facility personnel with an annual review of their initial hazardous waste training. During the inspection, it was found that the facility failed to train facility personnel working in the hazardous waste management program, in the required 365 day time limit. The facility's hazardous waste management training was conducted on February 2, 1997 and not again until November 8, 1998.

2. 40 CFR 265.16(d)(1), adopted by reference at 15A NCAC 13A .0110, states that the owner or operator must maintain job titles for each position related to hazardous waste management, and the name of the employee filling the job.

Brite-Sol Services, Inc. is in violation of 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.16(d)(1), adopted by reference at 15A NCAC 13A .0110, in that they failed to assign job titles for each position related to hazardous waste management program, and the name of the employee filling the job. During the inspection, it was found that personnel working in the facility's hazardous waste management program failed to have their name documented as holding any job title within this program.

3. 40 CFR 265.16(d)(2), adopted by reference at 15A NCAC 13A .0110, states that the owner or operator must maintain a written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.

Brite-Sol Services, Inc. is in violation of 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.16(d)(2), adopted by reference at 15A NCAC 13A .0110, in that they failed to list written job descriptions for employees working the facility's hazardous waste management program.

4. 40 CFR 265.16(d)(3), adopted by reference at 15A NCAC 13A .0110, states that the owner or operator must provide a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section.

Brite-Sol Services, Inc. is in violation of 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.16(d)(3), adopted by reference at 15A NCAC 13A .0110, in that they failed to provide a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section.

5. 40 CFR 265.16(e), adopted by reference at 15A NCAC 13A .0110, states that training records on current personnel must be kept until the closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

Brite-Sol Services, Inc. is in violation of 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.16(e), adopted by reference at 15A NCAC 13A .0110, in that they failed to maintain hazardous waste management training records on personnel no longer working at the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

6. 40 CFR 265.37, adopted by reference at 15A NCAC 13A .0110, states that the owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:
  - (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
  - (2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;
  - (3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
  - (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from the fires, explosions, or releases at the facility.

Brite-Sol Services, Inc. is in violation of 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.37, adopted by reference at 15A NCAC 13A .0110, in that they failed to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:

- (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
  - (2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;
  - (3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
  - (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from the fires, explosions, or releases at the facility.
7. 40 CFR 265.52(c), adopted by reference at 15A NCAC 13A .0110, states that the facility's contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.

Brite-Sol Services, Inc. is in violation of 40 CFR 262.34 (a)(4), adopted by reference at 15A NCAC 13A .0107, referenced at 40 CFR 265.52(c), adopted by reference at 15A NCAC 13A .0110, in that the facility's contingency plan failed to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37.

8. 40 CFR 265.52(d), adopted by reference at 15A NCAC 13A .0110, states that the facility's contingency plan must list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see Section 265.55), 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.

Brite-Sol Services, Inc. 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, in that the facility's contingency plan failed to list the names, addresses, and phone numbers (office and home) of all persons

qualified to act as emergency coordinator (see Section 265.55), 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.

9. 40 CFR 265.53(b), adopted by reference at 15A NCAC 13A .0110, states that a copy of the contingency plan and all revisions must be submitted to all local police departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Brite-Sol Services, Inc. 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, in that the facility failed to submit copies of their contingency plan and all revisions to all local police departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

10. 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.

Brite-Sol Services, Inc. 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, in that the facility failed to immediately amend their contingency plan to show a change in the emergency coordinator. Specifically, during the inspection, a review of the facility's contingency plan indicated that Terminal Manager, Mr. Al Relf, had not been added as the replacement for previous Terminal Manager as the primary emergency coordinator.

- B. 15A NCAC 13A .0110(i), states that the owner or operator shall keep records and results of required inspections for at least three years from the date of the inspection.

Brite-Sol Services, Inc. is in violation of 15A NCAC 13A .0110(i), in that the facility failed to keep records and results of required inspections for at least three years from the date of the inspection. During the inspection, documentation of required weekly inspections could not be provided for November 1998.

Reinspection: May 11, 1999

Page Six

### COMPLIANCE SCHEDULE

By March 23, 1999, Brite-Sol Services, Inc. located at 1200 Exchange Street, Charlotte, N.C. 28108, shall comply with the following requirements:

- A. Comply with 40 CFR 262.34(a)(4), adopted by reference at 15A NCAC 13A .0107. Brite-Sol Services, Inc. shall comply with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265, with Section 265.16, and with 40 CFR 268.7(a)(4). Specifically, Brite-Sol Services, Inc. shall:
1. Ensure that an annual review of the hazardous waste management training is provided to their employees working within this program as required by 40 CFR 265.16(c), adopted by reference at 15A NCAC 13A .0110. *Facility will be conducting their first review of HAZ. WASTE TRAINING on or before NOV. 8, 1998 IN COMPLIANCE*
  2. Ensure that job titles are maintained for each position related to hazardous waste management, and the name of the employee filling each job as required by 40 CFR 265.16(d)(1), adopted by reference at 15A NCAC 13A .0110. *Facility has assigned job titles IN COMPLIANCE*
  3. Ensure that written job descriptions are maintained for each position related to hazardous waste management as required by 40 CFR 265.16(d)(2), adopted by reference at 15A NCAC 13A .0110. *The facility has documented written descriptions for job titles - IN COMPLIANCE*
  4. Ensure that written descriptions of the type and amount of both introductory and continuing training that will be given to each position related to hazardous waste management as required by 40 CFR 265.16(d)(3), adopted by reference at 15A NCAC 13A .0110. *The facility has documented written descriptions of the type of training - IN COMPLIANCE*
  5. Ensure that training records on current personnel are kept until the closure of the facility. Additionally, training records on former employees must be kept for at least three years from the date the employee last worked at the facility as required by 40 CFR 265.16(e), adopted by reference at 15A NCAC 13A .0110. *Facility's policy will be to keep these records in the future. IN COMPLIANCE*
  6. Ensure that an attempt has been made to make the appropriate arrangements with local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services as required by 40 CFR 265.37, adopted by reference at 15A NCAC 13A .0110. *Arrangements have been made - IN COMPLIANCE*
  7. Ensure that the facility's contingency plan describes arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 40 CFR 265.37 as required by 40 CFR 265.52(c), adopted by reference at 15A NCAC 13A .0110. *Facility's Contingency Plan describes arrangements that will be made in the event any of these responding agencies are called in an emergency. IN COMPLIANCE*  
*A copy of this plan was provided to the STATE*

8. Ensure that the facility's contingency plan lists the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 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 as required by 40 CFR 265.52(d), adopted by reference at 15A NCAC 13A .0110. - Facility has listed the emergency coordinator and all applicable requirements. IN COMPLIANCE

9. Ensure that a copy of the facility's contingency plan and all revisions must be submitted to all local police departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services as required by 40 CFR 265.53(b), adopted by reference at 15A NCAC 13A .0110. IN COMPLIANCE  
Facility will fax documentation of certified mail receipts at a later date.

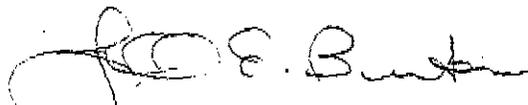
10. Ensure that the facility's contingency plan has been reviewed, and amended to show the change in emergency coordinators as required by 40 CFR 265.54(d), adopted by reference at 15A NCAC 13A .0110. Facility's contingency plan shows Mr. Al Rife as the primary emergency coordinator. IN COMPLIANCE

B. Comply with 15A NCAC 13 .0110(i). Brite-Sol Services, Inc. shall keep records and results of required inspections for at least three years from the date of the inspection. The facility has continued to perform and document their weekly inspections. IN COMPLIANCE

If the requirements above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13A.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.

If you have any questions concerning this matter, you may contact Mr. Joseph Parker at (704)663-1699.

Sincerely,



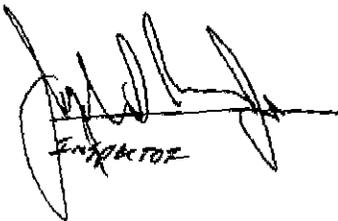
Jill Burton, Acting Chief  
Hazardous Waste Section

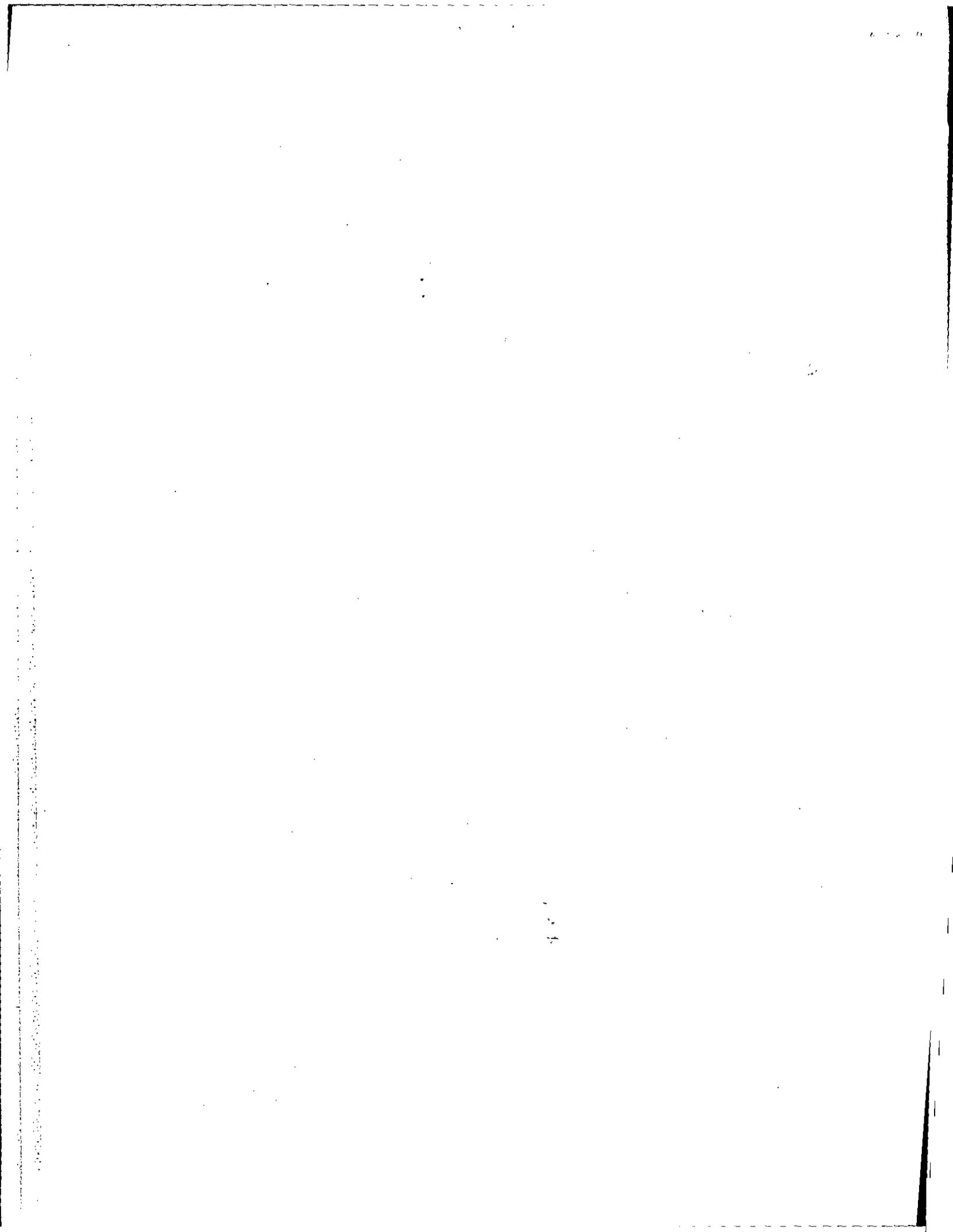
COMMENTS: Once the facility submits documentation of the certified mail receipts, the facility will be shown in compliance with NOV Docket # 99-109

cc: Doug Holyfield  
~~Joe Parker~~  
Central Files

Facility has submitted copies of the certified mail receipts for violation A-9. Facility is in compliance with NOV Docket # 99-109.

\*CERTIFIED MAIL receipt dates were May 21, + 24, 1999.

  
INSPECTOR  
Facility Contact



## RCRA INSPECTION REPORT

X - VIOLATION NOTED NA - NOT APPLICABLE

Facility Name: Brite-Sol Services, Inc.  
Location: 1200 Exchange Street, Charlotte, N.C. 28208  
Mailing Address: \_\_\_\_\_  
EPA ID#: NCR 000 000 414 Phone Number: (704) 394-6361  
Contact/Title: Gabby Smith - Manager, Al Relf - Terminal Manager  
Inspection Date: May 11, 1999 Last Inspection: Jan. 14, 1999  
Status: LOG Type of Inspection: CSE  
Inspector(s): Joseph Parker - Waste Management Specialist  
Present at Inspection: Gabby Smith - Brite-Sol Services, Al Relf -  
Brite-Sol Services (Reinspection comments will be in bold face)

Type of Business: Brite-Sol Services Inc. operates as a tank  
cleaning operation. The facility cleans large trailer tanks,  
totes, and drums.

Wastes Generated: The facility has generated the following types  
of hazardous waste since the last inspection:

U188 - Waste Phenol Solutions  
D001 - Waste Flammable Liquids (resins, disobutylene)  
D001 - Waste Flammable Liquids (resin, xylene)

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

The facility's 1997 and 1998 hazardous waste manifests were  
reviewed. They were found in good order.

Transporters: Safety-Kleen, Inc. - SCD 987 574 647  
Safeway Chemical Transportation - DER 000 000 273

TSDs: Safety-Kleen, Inc - NCD 000 648 451  
Chemical Solvents - OHD 980 897 656  
Southdown - TND 981 920 119

Waste Minimization: The facility's waste minimization program  
includes sending any leftover material back to the original  
generator and they recycle any solvents that are recovered.

Inspection Records:  
Evidence that inspections are conducted: The facility does document  
their weekly inspections. During the inspection, the facility  
could not provide documentation of the weekly inspections conducted  
in November of 1998. These inspections need to be retained for  
three years after the inspection is conducted. The facility has  
continued to perform and document their weekly inspections. They  
understand that these inspections need to be available for  
inspections for a period of three years after the date of  
inspection. In Compliance.



Page Two - RCRA Inspection Report

Facility Name: Brite-Sol Services, Inc.

EPA ID#: NCR 000 000 414 Inspection Date: May 11, 1999

Inspections on Storage Area: Yes, conducted weekly

Inspections on H.W. Tanks: N/A

Inspections on Ancillary Equipment: N/A

*Contingency Plan:*

On-Site? Yes

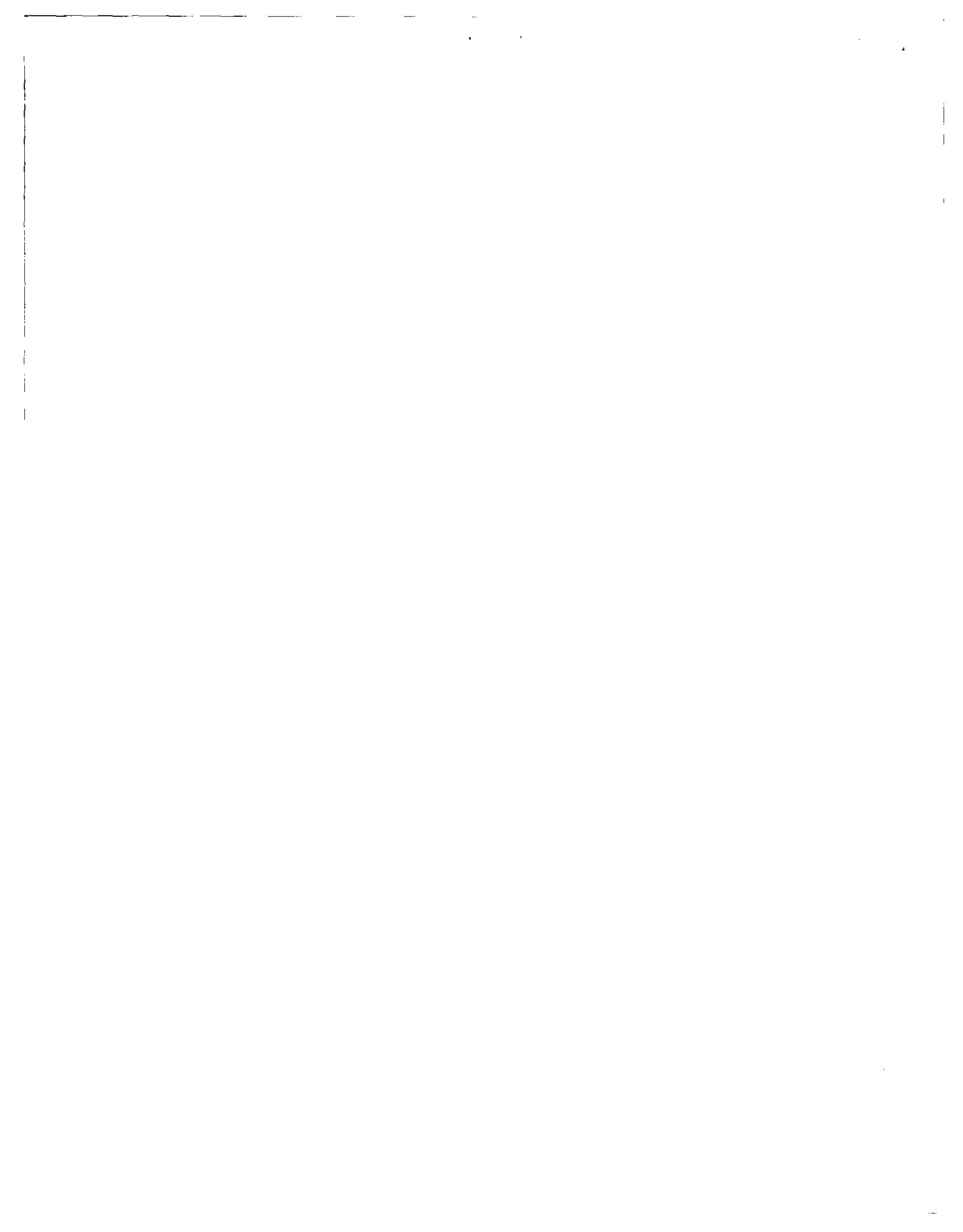
Any changes to facility/processes or Emergency Coordinator since last review? Yes, the facility failed to amend their contingency plan to show a change in their emergency coordinator. The facility has named Mr. Al Relf the Emergency Coordinator for the site. In Compliance. Additionally, the following deficiencies were noted after review the facility's contingency plan: (1) No hospital was designated for emergencies. The facility has designated University Hospital as choice for medical emergencies. In Compliance. (2) The contingency plan did not have a list of personnel that were qualified to act as an emergency coordinator. The facility has named Mr. Al Relf the Emergency Coordinator for the site. No alternate has been named. In Compliance. (3) No documentation was provided to show that emergency agencies had received a copy of previous contingency plans. The facility has provided copies of the Certified Mail receipts to the State for documentation of arrangements made. The facility came into compliance on May 21, 1999. In Compliance.

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

Agreements with Emergency Responders? No agreements with emergency agencies were documented within the contingency plan. The facility's contingency plan describes the agreements made with local emergency agencies. A copy of the facility's contingency plan was provided to the State. In Compliance.

*Training Records:*

Certified Training Documents Available? The facility's training dates were available. But, the following items could not be provided during the inspection: (1) a job title for each position related to hazardous waste management. The facility has assigned job titles for facility personnel working in their hazardous waste management program. In Compliance. (2) a written job description for each position listed in the hazardous waste management program. The facility documented job descriptions for facility personnel working in their hazardous waste management program. In Compliance. (3) No written description of the type and amount of both introductory and continuing that will be given to each person filling a position in the hazardous waste management program. The facility has documented written descriptions of the type of training facility personnel receive while being in their hazardous waste management program. In Compliance. (4) No training records on past employees. Facility's policy will be to keep these records



Page Three - RCRA Inspection Report

Facility Name: Brite-Sol Services, Inc.

EPA ID#: NCR 000 000 414 Inspection Date: May 11, 1999

in the future. In Compliance.

New Employees Since Last Inspection? Yes, all new employees since the last inspection. They have all been trained.

Evidence of Improper/Inadequate Training? Yes, the facility failed to train their employees within a 365 day time limit. Their past two training dates were Feb. 2, 1997 and Nov. 8, 1998. The facility is aware of the 365 day time limit and plans conducting their next training on or before Nov. 8, 1999. In Compliance.

Annual Report Submitted? Yes

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? No releases of hazardous waste observed.

Internal Communications or Alarm Present? The facility has an internal alarm system with activation switches throughout the facility and telephones.

Portable Fire Extinguishers and/or Fire Control Equipment? The facility has fire extinguishers throughout the facility.

Spill Control Equipment: The facility has the following spill control equipment: absorbent material such as booms, pads, loose material, brooms and PPE.

Adequate Water Volume, Foam Equipment or Auto Sprinklers? No automatic sprinklers

All Equipment/Alarms Tested and Maintained? Alarm system tested periodically

All Personnel Handling HW have Access to Alarm/Device? The facility has activation switches throughout the facility and telephones.

Adequate Aisle Space in Areas of Facility Operation? Yes

Satellite Accumulation Area(s): 0

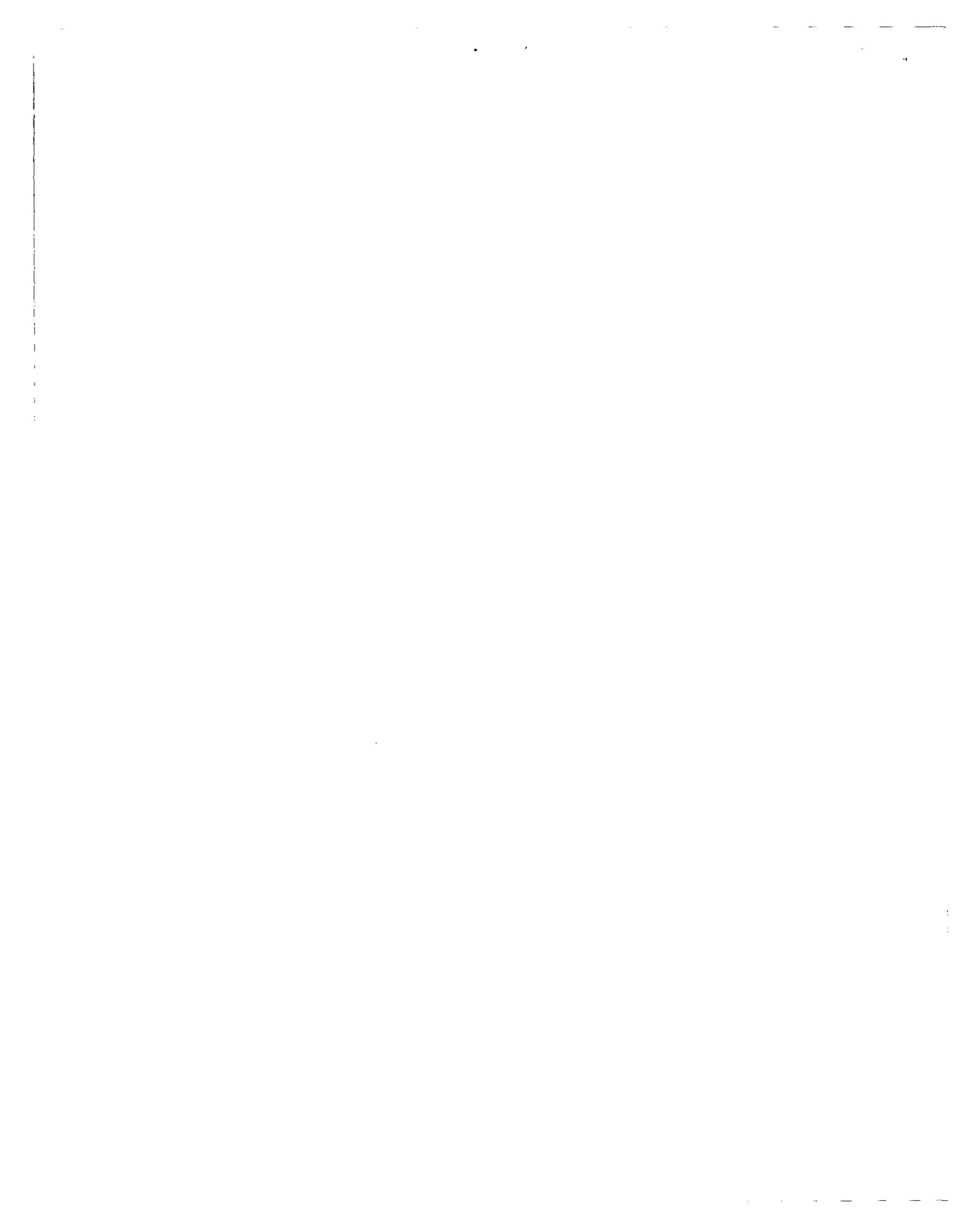
Location(s): The facility does not have any satellite accumulation areas for hazardous waste. Once the facility cleans a tank out, the material is containerized and stored in their 90 day storage area.

Satellite Containers: Closed? N/A

Labeled/Contents Identified? N/A

< 55 Gallons? N/A

Releases? N/A



Page Four - RCRA Inspection Report

Facility Name: Brite-Sol Services, Inc.

EPA ID#: NCR 000 000 414 Inspection Date: May 11, 1999

Storage Area(s): 1

Description(s): The facility's 90 day storage area for hazardous waste is located in their cleaning bay. During the inspection, no hazardous waste containers were in storage.

Containers: Closed? N/A Aisle Space? N/A Labeled? N/A  
Dated? N/A Evidence of Release? N/A  
< 90 Days? N/A Good Condition? N/A

Other HW Units: (Applicable Regulations)

Description of Unit: None

External Facility Condition: Good

**Site Deficiencies:**

The following is a list of site deficiencies noted during the inspection conducted on January 14, 1999.

1. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(c) - Personnel Training. Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section. During the inspection, it was noted that facility exceeded the 365 day time limit between training events. Their hazardous waste management training was conducted on Feb. 2, 1997 and not again until Nov. 8, 1998. **In Compliance.**
2. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(1) - The facility failed to assign job titles for each position related to hazardous waste management, and the name of the employee filling each job. **In Compliance.**
3. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(2) - The facility failed to list written job descriptions for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position. **In Compliance.**
4. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(d)(3) - The facility failed to have a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section. **In Compliance.**

5. 40 CFR 262.34(a)(4) ref. 40 CFR 265.16(e) - Training records on current personnel must be kept until the closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company. The facility failed to retain training records of former employees working in their hazardous waste management program. **In Compliance.**
  
6. 40 CFR 262.34(a)(4) ref. 40 CFR 265.37 - The facility failed to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:
  - (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
  - (2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;
  - (3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
  - (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from the fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record. **In Compliance.**
  
7. 40 CFR 262.34(a)(4) ref. 40 CFR 265.52(c) - The facility's contingency plan failed to describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Section 265.37. **In Compliance.**
  
8. 40 CFR 262.34(a)(4) ref. 40 CFR 265.52(d) - The facility's contingency plan failed to list the names, addresses, and phone numbers (office and home) of all persons qualified to

Page Six - RCRA Inspection Report

Facility Name: Brite-Sol Services, Inc.

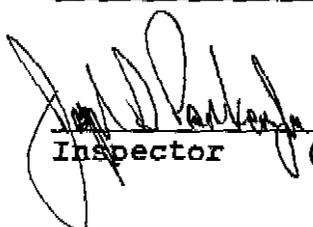
EPA ID#: NCR 000 000 414 Inspection Date: May 11, 1999

act as emergency coordinator (see Section 265.55), 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. In Compliance.

9. 40 CFR 262.34(a)(4) ref. 40 CFR 265.53(b) - The facility failed to submit copies of their contingency plan to all local police departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. In Compliance.
10. 40 CFR 262.34(a)(4) ref. 40 CFR 265.54(d) - Amendment of contingency plan. The contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes. During the inspection, a review of the facility's contingency plan indicated that Terminal Manager, Mr. Al Relf, had not been added as the replacement for previous Terminal Manager as the primary emergency coordinator. Mr. Relf took over for the previous Terminal Manager approximately six months prior to the inspection. In Compliance.
11. 15A NCAC 13A .0110(i) - Inspections. The facility failed to keep records and results of required inspections for at least three years from the date of the inspection. During the inspection, documentation of required weekly inspections could not be provided for November 1998. In Compliance.

Follow Up Inspection: May 11, 1999

Comments: The facility was found to be in compliance with the requirements of Notice of Violation Docket #99-109. If the facility has any questions please contact Joe Parker at the Mooresville Regional Office (704) 663-1699.

  
Inspector

6-11-99  
(Date)

(CERTIFIED MAIL)  
Facility Contact

\_\_\_\_\_  
(Date)