

Hazardous Waste Compliance Data Entry Form - Side A

EPA ID Number: NC5000000522

Facility Name: CITY SALVAGE City: CHARLOTTE

EVALUATION DATA New: X Change: Delete:

Date: 1/25/07 CEI - MSRP
Date:

Handwritten notes:
3/8/07
MSRP 60-007

Inspector ID #: 044 Reason:

Evaluation Comments: WARNING LETTER

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)
- a SNC (SNY evaluation) Docket #
or
- no longer a SNC (SNN eval.)

YES / NO	CSE ONLY		Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells
Waste Involved	Volume						

1 Type: GSQ Date Determined: 01/25/07 Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 03/09/07 /
Scheduled Actual

Reg. Type: SR Reg. Description: 273.13(c)(1)

Comment: Mercury switches must be placed in "structurally sound" container

2 Type: GSQ Date Determined: 01/25/07 Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 03/09/07 /
Scheduled Actual

Reg. Type: SR Reg. Description: 273.13(c)(2)(vi)

Comment: Employees not trained in waste handling procedures

3 Type: GSO

Date Determined: 01/25/07

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 03/09/07

Scheduled

Actual

Reg. Type: SR

Reg. Description: 273.14(dx1)

Comment: Mercy containers not labeled

4 Type: GSO

Date Determined: 01/25/07

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 03/09/07

Scheduled

Actual

Reg. Type: SR

Reg. Description: 273.15(c)

Comment: no log for UW storage

5 Type: GSO

Date Determined: 01/25/07

Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 03/09/07

Scheduled

Actual

Reg. Type: SR

Reg. Description: 279.22(cx1)

Comment: Used oil tank not labeled

Type:

Date Determined: / /

Class:

Priority: Branch: Person:

Return to Compliance: / /

Scheduled

Actual

Reg. Type:

Reg. Description:

Comment:

Type:

Date Determined: / /

Class:

Priority: Branch: Person:

Return to Compliance: / /

Scheduled

Actual

Reg. Type:

Reg. Description:

Comment:



MSP
60-007

North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE SECTION

WARNING LETTER

To: City Salvage
3628 Northerly Rd.
Charlotte, NC 28206
Attn: Dennis Baucom

Date of Visit: January 25, 2007

Facility Type: SALVAGE YARD/AUTO CRUSHER

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 January 25, 2007, Mark Burnette and Sean Morris, representing the North Carolina Hazardous Waste Section inspected City Salvage located in Charlotte, North Carolina for compliance with North Carolina Hazardous Waste Management Rules. During that investigation, the following violations were noted:

Citation	Specifics
40 CFR 273.13(c) (1)	Mercury switches must be placed in a structurally sound container. <i>During the inspections, recovered mercury switches were stored in a plastic bag that was not structurally sound.</i>
40 CFR 273.13(c) (2) (vi)	The Facility must ensure that employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers. <i>During the inspection, there was no evidence of worker training in proper handling of universal waste.</i>
40 CFR 273.14(d) (1)	Mercury storage containers must be labeled with the words "Universal Waste -Mercury Containing Equipment," "Waste Mercury Containing Equipment," or "Used Mercury Containing Equipment" <i>During the inspection, the mercury switches were not stored in a labeled container.</i>

40 CFR 273.15(c)

Universal Waste handlers must be able to demonstrate how long their universal waste has been on-site.

During the inspection, the facility did not have a log or their accumulation time for their mercury switches.

40 CFR 279.22(c)(1)

Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

During the inspection, the oil storage tank was not labeled with the words "Used Oil."

You are hereby required to comply with the noted violations by **March 9, 2007** at which time a follow up visit may be performed. If compliance with the violations noted above is not met, you may be subject to formal enforcement procedures and an administrative penalty may be assessed for violation of the hazardous waste law or regulations.

In further satisfaction of the violations listed above, City Salvage shall provide a written certification with supporting documentation on company letterhead confirming the noted compliance schedule has been completed. Mail this certification to Mark Burnette- Waste Management Specialist at NCDENR-Division of Waste Management, Hazardous Waste Section, PO Box 2481, Indian trail, NC 28079.

2/2/07
(Date)


N.C. Hazardous Waste Section

SENT CERTIFIED MAIL
(Recipient Signature)

Cc: Jesse Wells, Western Supervisor
Central Files
MRO files

One
North Carolina
Naturally

NC HAZARDOUS WASTE SECTION
MERCURY SWITCH REMOVAL PROGRAM
COMPLIANCE EVALUATION CHECKLIST

MSRP
60-007

FACILITY NAME: CITY SALVAGE DATE: 1/25/07

ADDRESS: 3628 NORCHERY RD
CHARLOTTE, NC 28206

OWNER/CONTACT: Dennis Baucom PHONE: _____

TYPE OF BUSINESS: Salvage (and

MERCURY SWITCH MANAGEMENT

FACILITY COLLECTING MERCURY SWITCHES: YES / NO

EVIDENCE OF MERCURY RELEASE TO ENVIRONMENT: YES / NO

SWITCHES CONTAINERIZED: YES / NO
BUT - STORED IN A ZIPLOCK BAG - NOT A "STRUCTURALLY
SOUND" CONTAINER

SWITCHES IN CLOSED CONTAINERS: YES / NO
SEE ABOVE

CONTAINERS PROPERLY LABELED: YES / NO
NOT LABELED CONTAINER

FACILITY ABLE TO DEMONSTRATE ACCUMULATION TIME: YES / NO
NO ACCUMULATION LOG

EMPLOYEES TRAINED IN MERCURY HANDLING & EMERGENCY PROCEDURES: YES / NO
NO TRAINING DOCUMENTATION

MERCURY SWITCH REMOVAL LOG MAINTAINED: YES / NO (not a regulatory requirement)

USED ANTIFREEZE MANAGEMENT

→ DOES THE FACILITY GENERATE USED ANTIFREEZE: YES / NO STORED IN TANKS / CONTAINERS
NO?

USED ANTIFREEZE DISPOSAL RECEIPTS MAINTAINED: YES / NO

EVIDENCE OF USED ANTIFREEZE RELEASE: YES / NO

NO

USED OIL MANAGEMENT

DOES FACILITY GENERATE USED OIL: YES / NO STORED IN: TANKS CONTAINERS

~ 300 Gallon AST

TANKS / CONTAINERS PROPERLY LABELED: YES / NO

Tank is not labeled "USED OIL"

EVIDENCE OF USED OIL RELEASE: YES / NO

Some used oil on the outside of the container & in secondary containment

USED OIL DISPOSAL RECEIPTS MAINTAINED: YES / NO (not a regulatory requirement)

M & M Waste Oil

864-877-7137

LEAD / ACID BATTERY MANAGEMENT

DOES FACILITY GENERATE LEAD / ACID BATTERIES: YES / NO

BATTERIES PROPERLY MAINTAINED TO PREVENT A RELEASE: YES / NO

STORED ON CEMENT PAD UNDER ROOF

DISPOSAL RECEIPTS MAINTAINED: YES / NO (not a regulatory requirement)

GASOLINE MANAGEMENT

DOES FACILITY GENERATE SPENT/WASTE GASOLINE OR REUSEABLE GASOLINE (SPECIFY)

REUSEABLE

GASOLINE STORED IN: TANKS / CONTAINERS

~ 1000 Gallon AST

DISPOSED OF BY/REUSED BY:

M & M Waste Oil

PROPER WASTE DETERMINATION MADE: YES / NO

TOTAL AMOUNT OF SPENT/WASTE GASOLINE OR REUSEABLE GASOLINE GENERATED AND TOTAL AMOUNT ONSITE: (SPECIFY TYPE & AMOUNT-SPENT OR REUSEABLE)

~ 500 gal / mo.

EVIDENCE OF A SPENT/WASTE GASOLINE RELEASE: YES / NO

Inside the secondary containment

FACILITY GENERATOR STATUS: not a HW generator

GENERAL INSPECTION NOTES:

Recommendations:

- USE Enclosed Checklist for training & keep a sign-in sheet annually for employees
- Get a Mercury Spill cleanup kit
- Manage the used gas/water mixture & ensure it don't enter the environment. You may want to look into getting an epoxy layer inside your secondary containment

M. S. Smith 2/2/07
INSPECTOR / DATE

Via mail
FACILITY CONTACT

Site Referrals (contact & date referred)

NC Division of Water Quality: _____
NC Solid Waste Section: _____
NC Division of Air Quality: _____
County Agency: _____
Other: Fire Marshall's office (used gas issues)