

EPA ID Number: NCD000016485

Facility Name: MAST BEOS DBA EXPRESS CONTAINER City: CHARLOTTE

1316106

EVALUATION DATA New: X Change: \_\_\_\_\_ Delete: \_\_\_\_\_

Date: 2/16/06 CEI  
Date: 1/1

Inspector ID #: 044 Reason: \_\_\_\_\_

Evaluation Comments: Docket # 2006-119

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

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

# 1 Type: CCR Date Determined: 02/16/06 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: 01 Person: 044

Return to Compliance: 03/24/06 Scheduled 1 Actual 1

Reg. Type: SR Reg. Description: 40 CFR 265.16(c)

Comment: Annual training not conducted for Herbert Lamb in 2005

# 2 Type: CCR Date Determined: 02/16/06 Class: \_\_\_\_\_

Priority: \_\_\_\_\_ Branch: 01 Person: 044

Return to Compliance: 03/24/06 Scheduled 1 Actual 1

Reg. Type: SR Reg. Description: 40 CFR 265.54(d)

Comment: Failure to update emergency coordinator list



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

**Certified Mail  
Return Receipt Requested**

February 21, 2006

Mast Bros Tank Cleaning dba Express Container Services  
1734 Tarheel Road  
Charlotte, NC 28208  
Attn: Carl Gambrell

**Subject:** Notice of Violation  
Mast Bros Tank Cleaning (NCD 000 016 485)  
RCRA Compliance Evaluation Inspection  
**Docket #:** 2006-119  
**Date of Inspection:** February 16, 2006  
**Facility Type:** LQG

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), NCGS 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On February 16, 2006, Mr. Mark Burnette and Mr. Brian Polk representing the North Carolina Hazardous Waste Section inspected your facility for compliance with North Carolina Waste Management Rules. During the investigation, the following violations were noted:

**40 CFR 265.16(c)-** Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

*Mast Bros. failed to train all of their hazardous waste handlers annually. Herbert Lamb did not have training records for 2005.*

**40 CFR 265.54 (d)-** The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

(d) The list of emergency coordinators changes; or

*Mast Bros. failed to update their emergency coordinator list in their contingency plan.*

You are hereby required to comply with the noted violations by **March 24, 2006**, after which time a follow-up visit may be performed. If compliance with the violations noted 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 per day may be assessed for violations of the hazardous waste law or regulations.

In further satisfaction of Docket #2006-119, Mast Bros. Tank Cleaning shall provide a written certification with supporting documentation on company letterhead confirming the noted compliance schedule has been completed. Mail this certification to Mr. Mark Burnette – Waste Management Specialist at NCDENR-Division of Waste Management, Hazardous Waste Section, PO Box 2481, Indian Trail, North Carolina 28079.

2/21/06  
(Date)

Mark Burnette  
N.C. Hazardous Waste Section

cc: Mr. Jesse Wells, NC Hazardous Waste Section  
Central Files  
MRO files

One  
North Carolina  
*Naturally*

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# Large Quantity Generator Inspection Report

NCDENR, Division of Waste Management, Hazardous Waste Section

February 21, 2006

**Facility Name:** Mast Brothers Tank Cleaning (d.b.a. Express Container Services)

**Location:** 1734 Tarheel Road, Charlotte North Carolina 28208 (PO Box 79, Paw Creek, NC 28130)

**EPA ID#:** NCD 000 016 485

**Phone Number:** 704-391-0503

**Contact/ Title:** Carl Gambrell/Dir Environmental Affairs

**Inspection Date:** February 16, 2006

**Last Inspection:** March 18, 2004

**Status:** LQG

**Type of Inspection:** CEI

**Inspectors:** Mark Burnette, Brian Polk

**Present at Inspection:** Carl Gambrell, Brian Polk, Mark Burnette

**Type of Business:** Mast Brothers Tank Cleaning (Mast) doing business as Express Container Services operates as a tank cleaning service for tanker trucks that haul various products and chemicals. When the trucks enter the facility, they are segregated into bays depending on what they were hauling. Once in the bay, the tanks are drained, and the product captured. The product is either sent back to the customer, the producer, or disposed of by Mast. The tanks are cleaned by use of pressurized water and cleaning products to neutralize what was in the tanks. This wash material is captured and treated on-site before being disposed of into Mecklenburg Counties municipal wastewater treatment system. Hazardous wastes are generated from bottoms that come out of the tanks, and materials that are not sent back to customers or producers.

## Areas of Inspection

### Manifests:

Manifests were reviewed for 2004-present. All of the necessary information was present, along with signatures, approved transporters, approved TSDF, and LDR forms.

<u>Transporters:</u>	Clean Harbors	MAD 039 322 250
	CMAC Environmental	ALD 981 020 894
	Robbie Wood	ALD 671 133 891
	Maumee Express	NJD 986 607 380

<u>TSDF's:</u>	CMAC Environmental	ALD 981 020 894
	Clean Harbors-Reidsville	NCD 000 648 451
	American Environmental Services	WVD 981 107 600

**Waste Generated:**

Waste Flammable Liquid	Styrene, MEK	D001
Waste Toxic Liquid	mercury	D009
Waste Sodium Borohydride & Sodium Hydroxidem Solution		D002

**Inspection Records:**

Inspections were reviewed for 2005-2006. All records were available and were in good order.

**Contingency Plan:**

Mast maintains a contingency plan on-site. Since the facility has changed ownership and some management, some of their emergency information has changed. The facility needs to update their list of emergency coordinators to reflect who is at the facility now. Any changes should be submitted as amendments to the original contingency plan to the facilities local emergency responders. Their plan did list emergency equipment, actions personnel are to take during an emergency, and included an evacuation plan. The facility has also made arrangements with their local responders in writing.

**Emergency Preparedness:**

Mast is operated to minimize the possibility of spills or releases of hazardous waste. The facility has made emergency arrangements with their local responders. They maintain emergency equipment such as spill kits, fire extinguishers, over-pack drums, and eyewash stations. The facility has evacuation procedures established, and no employee enters the hazardous waste storage area alone. The facility also maintains communication equipment such as telephones and alarms.

**Training Records:**

There are currently two hazardous waste handlers at Mast. Both handlers had proper job titles and job descriptions. However, training records for 2005 were not available for Herbert Lamb.

**Satellite Accumulation Area(s):**

The facility maintains one satellite accumulation area (SAA). This container is located in the wastewater treatment room. It is a 55-gallon container used to store waste flammable liquids. The container was properly closed and labeled.

**Storage Area:**

The facility maintains one <90 storage area. During the inspection, there were eleven containers in storage. The containers were properly closed, labeled and dated. The area is designated as hazardous waste storage, with a spill kit, fire extinguishers, eyewash station, no smoking signs, and an over-pack drum.

**Biennial Report:**

The facility submitted their biennial report for 2003 on February 23, 2004. They reported 29,550 lbs. of D001, D002, D003, D004, D005, D006, D007, D008, D018, D019, D021, D022, D023, D024, D025, D026, D032, D034, D035, D036, D038, and D039.

**Site Deficiencies:**

265.16(c)- Failure to receive annual training. Herbert Lamb did not have training records for 2005.

265.54- Failure to amend the contingency plan. The emergency coordinator list needs to be updated.

**Recommendations:**

The state's LQG Class is March 9, 2006 in Charlotte. Visit mcicnc.org for more info.

W. J. Lamb      2/21/06

by certified mail

Inspector      (Date)

Facility Contact      (Date)

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