

LEA ID NUMBER: NCD 000 016 485

Facility Name: MAST REOS DBA EXPRESS CONTAINER City: CHARLOTTE

COPY

EVALUATION DATA New: X Change: X Delete:

Date: 2/16/06 CSE
Date: 2/27/06 CSE

4

Inspector ID #: 044 Reason:

Evaluation Comments: Docket # 2006-119 OK

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.) APR 3 2 2006

YES / NO	<u>CSE ONLY</u> Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells
D1, D2 D9 Asst. D Waste	7200 lbs./month	N/A	N/A	1 person HW trained		

1 Type: GGK Date Determined: 02/16/06 Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 03/24/06 Scheduled 02/27/06 Actual

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

Comment: Annual training not conducted for Herbert Lambin JCS

2 Type: GGK Date Determined: 02/16/06 Class:

Priority: Branch: 01 Person: 044

Return to Compliance: 03/24/06 Scheduled 02/27/06 Actual

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

Comment: Failure to update emergency coordinator list OK

Large Quantity Generator Re-Inspection Report

NCDENR-Division of Waste Management-Hazardous Waste Section

February 27, 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

Re-Inspection Date: February 27, 2006

Last Inspection: March 18, 2004

Status: LQG

Type of Inspection: CSE

Inspector: Mark Burnette

Present at Inspection: Mark Burnette (via fax)

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>TSD'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.

Mast submitted an updated contingency plan that addresses the issues regarding their emergency coordinators and alternates.

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.

Mast submitted records showing that Herbert Lamb did receive refresher training in 2005.

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.

Records were received showing Herbert Lamb received training on 7/13/05.

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

Records were received showing the emergency coordinator list has been updated to reflect the proper contact information for who is on-site now.

Recommendations:

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

Michael G. Smith 2/27/06

Inspector (Date)

_____ by mail _____

Facility Contact (Date)