

Hazardous Waste Compliance Data Entry Form

EPA ID Number: NCR 986,166 338

Facility Name: SGS Environmental

Street: 5500 Business Dr.

City: Wilmington ZIP: 28405 County: New Hanover

Contact Name: Dan Spencer Phone#: (910) 350-1903

EVALUATION DATA New: Change: Delete:

Date: 05/08/2009

Evaluation Type: CEI

Date: 06/12/2009

Evaluation Type: CSE

Inspector ID #: 036

Evaluation Comments:

*** Ticket NOV 2009-076 ***

Date Determined:

Branch: 07

Person: 036

Return to Compliance:

06/08/09
Scheduled

06/12/09
Actual

Regulation Description: 40 CFR 262.34(d)(4) - 265.35

Comment: The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.

**State Of North Carolina
Department of Environment and Natural Resources
Hazardous Waste Section**

SMALL QUANTITY GENERATOR INSPECTION FORM

Facility Name: SGS Environmental

Inspection Date: 8 May 2009

EPA ID#: NCR 986 166 338

Last Inspected: None

County: New Hanover

Address: 5500 Business Drive
Wilmington, NC 28405

Contact/Phone #: (910) 350-1903

Present at Inspection: Dan Spencer, Travis Price & Bobby Nelms

Owner: SGS

Type of business: Analytical Lab

Waste generated: Waste Flammable Liquids F002, F005, D001
Corrosive Liquids, Sulfuric Acid D002
Waste Dichloromethane F002

Transporters: Viola NJD 080 631 369

TSD's: NCD 986 166 338

Manifests/signed copies within 60 days? Yes the 2009 manifests were reviewed and found to be in order.

Inspection records? The weekly inspections were being conducted.

Emergency information #'s posted by phone?(name & # of emergency coordinator, fire dept., location of fire extinguisher, fire alarm, spill control): Emergency information is posted. Add additional information as noted during the inspection.

Emergency coordinator (must be onsite or on call): Dan Spencer

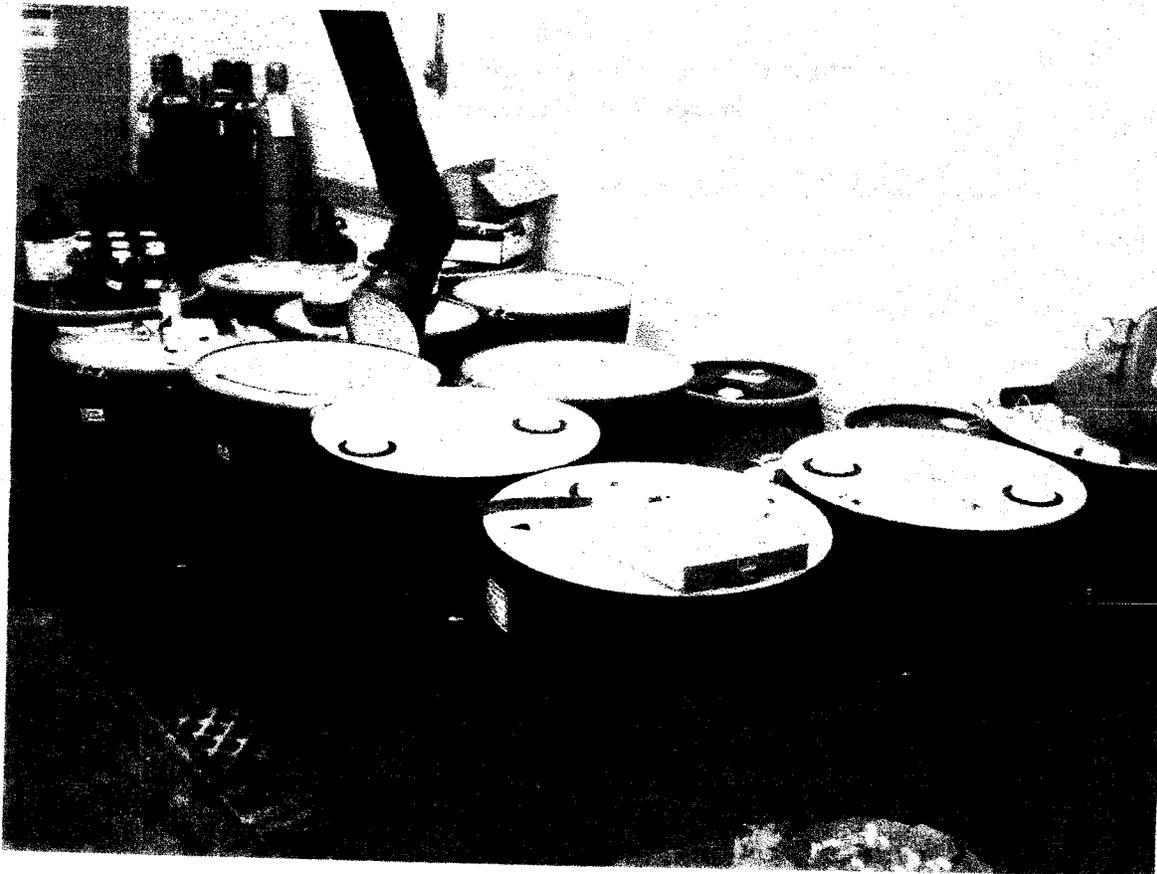
Spill kit/fire extinguishers? Located throughout the facility and noted on the contingency plan.

Personnel familiar w/waste handling & emergency procedures? Yes, personnel are trained.

Local authorities contacted? Yes, example letters were issued and it is recommended to re notify.

Satellite areas/description (closed, clean, labeled, <55 gallons?): There are several satellite areas in the lab areas. All of the containers were observed to be closed and labeled. I recommend that all labels be replaced due to poor condition.

Storage areas/description: (Closed, clean, labeled, dated <180 days, good condition, <6000 kg?): The 180 day storage area is located in the rear of the building on secondary containment. At the time of the inspection there were 15 drums of hazardous and non hazardous waste which were properly labeled, dated and closed but inadequate aisle space was an issue. (see photo next page)



Universal Waste: No violations noted.

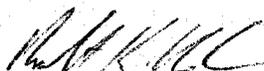
Used oil: Used oil is not generated at the site.

Deficiencies/Comments:

40 CFR 262.34(d)(4) adopted by reference at 15A NCAC 13A .0107 A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that: The generator complies with the requirements of subpart C of part 265.

40 CFR 265.35 adopted by reference at 15A NCAC 13A rule .0110 (c) Required aisle space.

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.


Bobby Nelms

13 May 2008
Date


Facility contact

5/13/09
Date

**Waste Management Division
Hazardous Waste Section**

NOTICE OF VIOLATION

To: SGS Environmental
5500 Business Drive
Wilmington, NC 28405

Docket# 2009- 076
Inspection Date: 8 May 2009
Facility Type: SQG

EPA ID # NCR 986 166 338

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 8 May 2009, Robert K. Nelms, representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted.

Citation

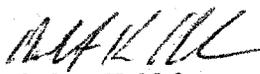
40 CFR 262.34(d)(4) adopted by reference at 15A NCAC 13A .0107 A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that: The generator complies with the requirements of subpart C of part 265.

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The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.

You are hereby required to comply with the noted violations by 8 June 2009, at which time a re inspection will be performed. If compliance with the violations noted above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701-.0707, an administrative penalty of up to \$32,500 per day may be assessed for violation of hazardous waste law or regulations.

 5/13/09
(Date)

 13 May 2009
Robert K. Nelms
Environmental Senior Specialist
Hazardous Waste Section, NCDENR

Copies to: File
Ted Cashion - Eastern Area Compliance Branch Supervisor
Central Files

8. **PREVIOUS VIOLATIONS / DEFICIENCIES:**

Violation(s) previously cited pertained to the following regulation(s):

40 CFR 262.34(d)(4) adopted by reference at 15A NCAC 13A .0107 A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that: The generator complies with the requirements of **subpart C of part 265.**

40 CFR 265.35 adopted by reference at 15A NCAC 13A rule .0110 (c) Required aisle space.

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, *unless* aisle space is not needed for any of these purposes.

9. **CONCLUSION(s):**

SGS Environmental is in compliance with the requirements of Ticket NOV #2009-076.



Robert K. Nelms
Environmental Senior Specialist, NCDENR

DATE: 12 June 2009

Emailed to Dan Spencer DATE: 12 June 2009
Facility Representative

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

COMPLIANCE SCHEDULE EVALUATION (CSE) REPORT

1. FACILITY INFORMATION:

DOCKET # 2009-076

Name: SGS Environmental
EPA ID Number: NCR 000 138 867
Type of Facility: Small Quantity Generator
Facility Location: 5500 Business Drive
Wilmington, NC 28405
Telephone Number: (910) 350-1903

2. FACILITY CONTACT: Dan Spencer

3. SURVEY PARTICIPANTS:

Robert K. Nelms - NCDENR

4. DATE OF EVALUATION: 12 June 2009

5. PURPOSE OF EVALUATION: Follow-up inspection to determine the status of the compliance schedule given in the Notice of Violation, Docket #2009-076. The NOV was issued subsequent to the RCRA inspection conducted on 8 May 2009.

6. FACILITY DESCRIPTION: REFER TO PREVIOUS INSPECTION.

HAZARDOUS WASTE STREAMS INCLUDE: REFER TO PREVIOUS INSPECTION.

7. AREAS RE-INSPECTED DURING EVALUATION:

(OK = previous deficiency corrected; V = violation observed; NA = not applicable to this inspection)

Contingency Plan – N/A

Personnel Training Records – N/A

Accumulation Areas – N/A

Storage Areas - OK

Inspection Logs – N/A

Manifests – N/A

OTHER

(over)