

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Andrew Martin
EPA ID: N C D 0 0 0 6 4 8 4 5 1
Facility Name: Clean Harbors, LLC
Document Group: Inspection/Investigation (I)
Document Type: Compliance Schedule Evaluation (CSE)
Description: CSE - Violation during inspection on 12/22/2014.
Date of Doc: 12/22/2014
Author of Doc: Andrew Martin

File Room Use Only

Date Recieved by File Room:

Date Scanned:

Month	Day	Year

NCD000648451

Scanner's Initials:

COMMERCIAL FACILITY REPORT
Resident Inspector Program
Waste Management Division
Department of Environment & Natural Resources

DOCKET #: 2015-016

INSPECTION AND EVALUATION

EPA ID #: NCD000648451		FACILITY NAME: Clean Harbors, LLC	
ADDRESS: 208 Watlington Industrial Blvd.		CITY: Reidsville, NC	
NEW <input checked="" type="checkbox"/>	UPDATE <input type="checkbox"/>	DATE(S) OF INSPECTION: 12/22/2014	STAFF ID #: 115

EVALUATION TYPE: <u>3, 6, 7, 9</u>	1 = Compliance Evaluation (CEI for HWS) 2 = Sampling / Monitoring. 3 = Record Review (Logs, Annual Report) 4 = Air / Water Permit Requirements 5 = Reinspection (Compliance Schedule). 6 = Cont. Plan / Prev & Prep (Safety/OSHA)	7 = Part B Permit 8 = Manifests / LDRs 9 = General 10 = Waste Analysis Plan 11 = Complaint Investigation 12 = BIF 80 = Informal Meeting
JOINT / SUB <input type="checkbox"/> OFF SHIFT <input type="checkbox"/> DURATION (Hrs) <u>3.0</u>		

REINSPECTION ONLY: Date of Initial Evaluation:

Original Docket #:

CLASS OF VIOLATION / DEFICIENCY

Class	O2/H2	Safety/CP	FIN	Part B	Comp Sch	Man	LB	OT	W Mgt	BIF
	O									
SNC		O		O		O	O		O	
SV		O		O		O	O		X	

SNC = Significant Noncomplier

SV = Secondary Violation

Acceptable Codes

RS	XS	XS	XS	XS	XS	XS	XS	XS	XS	XS
ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO
H	HR	HI*	H	H	H	H	H	H	H	H

Key:

X = Violation(s)

O = No Violation

R = Referral to DEM or OSHA

H = HPV Violations Present

Z = Pending / Deficiency

S = Same Violation (repeated)

I = No Insurance Only

* = SNC Only

ENFORCEMENT ACTIONS:

Area of Violation(s) = CP, PP, FI, PB, CS, MA, LB, OT, WM, BIF

CLASS	AREA OF VIOLATION	TYPE CODE	DATE ACTION TAKEN	COMPLIANCE DATES		PENALTY ASSES. COLL.	RESP AG
				SCHED.	ACTUAL		
SV	W Mgt	01	12/22/14	12/22/14	12/22/14		

Codes for Types of Enforcement Actions:

01 = Warning Letter

02 = Ticket NOV

03 = Draft NOV

04 = Admin. Complaint

05 = Final Admin. Order

10 = Informal

11 = Filed Civil Action

12 = Filed Criminal Action

13 = Civil Referral to AG

90 = Hearing

Comments / Recommendations: _____

**North Carolina Department of Environment
and Natural Resources
Division of Waste Management**

RESIDENT INSPECTOR REPORT

1) Facility Information

Clean Harbors, LLC
208 Watlington Indust. Blvd.
Reidsville, NC

EPA ID# NCD000648451

Permit Status: RCRA
 Air
 Water

2) Facility Contact

Eric Andrews

Arrived: 12:45 pm**Departed:** 3:40 pm**3) Date of Inspection / Inspector**

12/22/14
Andrew Martin

Shift: 1st
 2nd
 3rd
Wkend

4) Facility Description Changes

None

5) Areas of Concentration

Part "B" Permit	General	Waste Compatibility	Labeling
Physical Inspection	Waste Management	Container Management	
10-day Area	Waste Profiles		
General Safety			

6) Site Deficiencies**Docket #: 2015-016**

- Hazardous Waste Management Permit, No. NCD000648451 R-2, Permit Condition Part III (H)(3). Pursuant to this permit condition, the permittee shall not store a container of hazardous waste that is incompatible with any waste or material stored nearby in other containers, piles, open tanks, or surface impoundments unless the container is separated from the other materials by a dike, berm, wall, or other device.

Clean Harbors, LLC is in apparent violation of this permit condition in that during the inspection there was a 5-gallon container of D002 Waste Sodium hydroxide Solution (container 42308747) observed in stored in Acid Storage Bin 6 with several 55-gallon containers of waste acid solutions. The containers were not properly separated by a dike, berm, wall, or other device at the time of inspection.

Clean Harbors, LLC employees separated the incompatible wastes by placing the container of D002 Waste Sodium Hydroxide Solution in Bin 5 with other caustic waste streams. Although the deficiency was corrected during the inspection it is recommended that Clean Harbors personnel investigate the waste acceptance and storage procedures, which may have led to the storage of incompatible hazardous waste within the same storage bay. On the 11/17/14 and 11/3/14 FCI's potential compatibility issues were noted on the inspection reports.

[Handwritten signature]

12/22/14

Facility Representative

Date

Andrew Martin

12-22-14

Andrew Martin, QEP- Resident Inspector

Date