Hazardous Waste Section

File Room Document Transmittal Sheet

Your Name:	James Gilreath - 56
EPA ID:	N C D 0 4 9 7 7 3 2 4 5
Facility Name:	Trex Properties, LLC
Document Group:	Inspection/Investigation (I)
Document Type:	Focused Compliance Inspection (FCI)
Description:	TSD Inspection
Date of Doc:	2/10/2014
Author of Doc:	James Gilreath

File Room Use Only

NCD049773245

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

DOCKET #: *2014-025*

INSPECTION AND EVALUATION

EPA ID #:	**NCD 049773245**	FACILITY NAME:	**TREX Properties, LLC**
ADDRESS:	**3114 Cullman Avenue**	CITY:	**Charlotte, NC**
NEW ☒	UPDATE ☐	DATE(S) OF INSPECTION: **02/10/2014**	STAFF ID #: **56**

EVALUATION TYPE: 3,6,7,9	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 X OFF SHIFT ☐ DURATION (Hrs) 2.5		

REINSPECTION ONLY: Date of Initial Evaluation: n/a Original Docket #: n/a

CLASS OF VIOLATION / DEFICIENCY

Class	O2/H2O	Safety/CP	FIN	Part B	Comp Sch	Man	LB	OT	W Mgt	BIF
SNC	O	O		O		O		O	O	
SV	O	O		Z		O		O	Z	

SNC = Significant Noncomplier
SV = Secondary Violation

Acceptable Codes

R S Z O H	X S Z O H R	X S Z O HI*	X S Z O H	X S Z O H	X S Z O H	X S Z O H	X S Z O H	X S Z O H	X S Z O 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 SCHED.	ACTUAL	PENALTY ASSES.	COLL.	RESP AG
SV	PB,WM	01	02/10/2014	02/24/2014		---	---	---

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*

Trex Properties, LLC
3114 Cullman Avenue
Charlotte, NC

EPA ID# NCD 049773245

Permit Status: ☒ **RCRA** ☒ **Air** ☒ **Water**

2) *Facility Contact*

Jason Ridenour

Arrived: 8:45 a.m.
Departed: 11:20 a.m.

3) *Date of Inspection / Inspector*

02/10/2014
James Gilreath
Andrew Martin

Shift: ☒ 1st ☐ 2nd ☐ 3rd ☐ ***Wkend***

4) *Facility Description Changes*

None

5) *Areas of Concentration*

Part B Permit	HW & DOT Labeling	Containers
Storage Times	Storage Areas	

6) *Site Deficiencies* ***Docket #:*** *2014-025*

Facility Permit Condition Part X.A.1 requires compliance with 40 CFR 268. Within 40 CFR 268.50(b), as codified at 15A NCAC 13A. 0112, it is required that, "An owner/operator of a treatment, storage or disposal facility may store such waste for up to one year unless the Agency can demonstrate that such storage was not solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate recovery, treatment or disposal."

The facility failed to comply with the permit condition described above in that two containers of hazardous waste lead (Container #'s 67876 & 67877) and four drums containing hazardous waste methyl ethyl ketone (Drum #'s 67860, 67861, 67862 & 67863) exceeded storage time of one year. All six of the subject containers were accepted and placed into storage on 02/08/2013.

7) *Comments/Recommendations*

1. Several containers of hazardous waste are approaching the one year storage limit. The following hazardous waste containers and storage dates were noted:
Drum #'s 68088 68089 & 68090 Hazardous Waste Benzene, 2/21/2013
Drum # 68093 Hazardous Waste Hydrochloric Acid, 02/21/2013.
Drum # 67889 Hazardous Waste Sulfuric Acid, 02/11/2013.
Drum # 67952 Hazardous Waste Tetrachloroethylene, 02/13/2013.
Drum # 68054 Hazardous Waste Lead, 02/20/2013.
It is recommended that these containers be shipped off-site prior to exceeding the one-year storage time

limit.

2. Four drums were noted to have damaged, missing or conflicting labeling as follows:
Drum # 72031 located in flammable storage trailer is missing a DOT class label.
Drum of Hazardous Waste Flammable Liquid generated by Pace Analytical is missing the storage date label.
Drum #72684 was noted with both Hazardous Waste and Non-Regulated Waste labels.
The labeling on satellite hazardous waste drum located near the LUWA unit is worn/faded.
It is recommended that the facility container labeling noted above be evaluated and corrected, as necessary. Additionally, it is recommended that additional facility inspection procedure training be provided to facility staff.

3. One drum of Hazardous Waste Tetrachloroethylene (Drum # 69743, Detrex) was noted to have a small amount of liquid on the drum lid. It is recommended that this drum be evaluated for leaks and managed, as necessary.

8) *Follow up Action on Previously Noted Recommendations*

02/06/2014 Inspection:
The drum of hazardous waste flammable liquid previously noted with liquid on top of the container appears to still be leaking. It is recommended that this container be evaluated and managed, as necessary.

9) *Referrals to DAQ/DWQ/OSHA*

None

2/10/14

Facility Representative ***Date***

James Gilreath 02-10-2014

James Gilreath- Resident Inspector ***Date***