

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Andrew Martin - 115
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: TSDF Inspection. Universal Waste storage date violation.
Report/violation to be joined in with the Administrative Order
currently being written for Trex Properties, LLC.
Date of Doc: 8/1/2014
Author of Doc: Andrew Martin

File Room Use Only

Date Recieved by File Room:

Date Scanned:

Month	Day	Year

NCD049773245

Scanner's Initials:

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

DOCKET #: Pending

INSPECTION AND EVALUATION

EPA ID #: NCD049773245		FACILITY NAME: Trex Properties, LLC	
ADDRESS: 3114 Cullman Ave		CITY: Charlotte, NC	
NEW <input checked="" type="checkbox"/>	UPDATE <input type="checkbox"/>	DATE(S) OF INSPECTION: 8/1/2014	STAFF ID #: 115

EVALUATION TYPE: <u>6, 7, 8, 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>3.5</u>		

REINSPECTION ONLY: Date of Initial Evaluation:

Original Docket #:

CLASS OF VIOLATION / DEFICIENCY

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

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		
SNC	W Mgt	05	August 1, 2014	8/22/2014	-	- -	-

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# NCD049773245

Permit Status: RCRA
 Air
 Water

2) *Facility Contact*

Jason Ridenour

Arrived: 10:00 am

Departed: 1:30 pm

3) *Date of Inspection / Inspector*

8/1/14
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	
Inspection Logs	Perimeter Fencing	Records	

6) *Site Violations*

Docket #: Pending

- Hazardous Waste Permit #NCD049773245-R2, Condition Part X.A.1 requires compliance with 40 CFR 273.15(a) as codified in 15A NCAC 13A .0119. Pursuant to this regulation a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of paragraph (b) of this section are met.

Trex Properties, LLC is in apparent violation of this regulation in that during an inspection, five containers of Universal Waste Batteries were observed stored in the non-hazardous waste building. Four of the containers were not labeled with Trex Properties, LLC accumulation start dates. One of the containers had Trex Properties, LLC accumulation start date of 8/28/2009 (Drum # 51631). The other four containers had a generation dates of 5/27/2008 and 9/4/2007 from the generator. All five of the containers appear to have been in storage in excess of one year. The universal waste containers were apparently hidden amongst non-hazardous waste within the non-hazardous waste storage building. Facility personnel recently began rearranging non-hazardous waste containers to perform housekeeping operations within the building and the universal waste containers were discovered by the inspector after they were moved to a new location.

7) *Recommendations/Comments*

1. It is highly recommended that the facility perform a thorough inspection of the non-hazardous waste building to ensure that no other RCRA regulated wastes are stored within the non-hazardous waste building.

	8/8/14
<i>Facility Representative</i>	<i>Date</i>
<i>Andrew Martin</i>	8/8/2014
<i>Andrew Martin, QEP- Resident Inspector</i>	<i>Date</i>