

Hazardous Waste Section  
File Room Document Transmittal Sheet

17

Your Name: Sean Morris  
EPA ID: N C D 0 7 9 0 6 0 0 5 9  
Facility Name: Safety-Kleen Charlotte  
Document Group: Inspection/Investigation (I)  
Document Type: Focused Compliance Inspection (FCI)  
Description: Commercial TSDF Inspection  
Date of Doc: 2/27/2014  
Author of Doc: Sean Morris

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**File Room Use Only**

NCD079060059

Date Recieved by File Room:

Month	Day	Year

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**COMMERCIAL FACILITY REPORT**  
**Resident Inspector Program**  
 Division of Waste Management  
 Department of Environment and Natural Resources  
 North Carolina

**DOCKET #: N/A**

**INSPECTION AND EVALUATION**

EPA ID#: NCD.079060059		FACILITY NAME: Safety-Kleen	
ADDRESS: 2320 Yadkin Road		CITY: Charlotte, NC	
NEW <input checked="" type="checkbox"/>	UPDATE <input type="checkbox"/>	DATE OF INSPECTION: 2/27/14	STAFF ID# 46

<b>EVALUATION TYPE:</b> 3,6,7,8,9,10	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 / Prep & Prev (Safety/OSHA)	7 - Part B Permit 8 - Manifests / LDR 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) 2:20 HRS		

**REINSPECTION ONLY** - Date of Initial Evaluation:

Original Docket #:

**CLASS OF VIOLATION / DEFICIENCY**

Class	O2 / H2O	Safety/CP	Fin	Part B	Comp Sch	Man	LB	Other	W Mgt	BIF
SNC		O		O		O	O	O	O	
SV		O		O		O	O	O	O	

**Acceptable Codes**

RSZO H	XSZOHR	XSZO HI*	XSZO H	XSZO H	XSZO H	XSZ OH	XSZH O	XSZO H	XSZO H
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**KEY:** SNC = Significant Noncomplier  
SV = Secondary Violation

X - Violation(s)  
O - No Violation  
R - Referral to DEM or OSHA  
H - HPV Violations Present

Z - Pending  
S - Same Violation (Repeated)  
I - No Insurance Only  
\* - Class I 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		

**Codes for Types of Enforcement Actions:**

01 - Warning Letter	10 - Informal
02 - Ticket NOV	11 - Filed Civil Action
03 - Draft NOV	12 - Filed Criminal Action
04 - Admin, Complaint	13 - Civil Referral to AG
05 - Final Admin. Order	90 - Hearing

**Comments / Recommendations:** see report



**NORTH CAROLINA DEPARTMENT OF ENVIRONMENT & NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH**

**RESIDENT INSPECTOR REPORT**

**1) Facility Information:**

Safety-Kleen (S&K) Charlotte  
2320 Yadkin Avenue  
Charlotte, NC 28205

**EPA ID#: NCD079060059**

**Permit Status:**  RCRA  
 Air  
 Water

**2) S&K Charlotte Contacts:**

Mr. Steve Hetu-Branch General Manager  
704.375.0098

**Arrived: 1:10pm**

**Departed: 3:30 pm**

**3) Date of Inspection:**

February 27, 2014

Shift:  1st  
 2nd  
 3rd  
 Wkend

**4) Facility Participants:**

Mr. Steve Hetu

**5) Inspector:**

Mr. Sean Morris, HWS-Environmental Senior Specialist

**6) Facility Operational Changes:**

None

**7) Areas of Concentration:**

Physical Inspection	Container Management	Tank Area
Part "B" Permit	10-Day Area	Manifests / LDRs

**8) Follow-Up Activities:**

- The facility is still in the process of revising the site contingency plan as noted on the Jan. 28, 2014 inspection report.

**9) Comments/Recommendations:**

**Docket #: N/A**

- There was one ~55-gallon plastic container of D008/D018 hazardous waste liquid located in the facility's 10-day area that appeared to have leaked a small amount of liquid from the containers bung cap. The waste was generated by Bimbo Bakeries (CH Profile #691709). Mr. Hetu explained that the container would be placed into an over-pack.
- There were two 55-gallon container plastic containers noted in the area next to the Dock & Fill Building loading dock, which is typically used to stage empty containers. One of the containers was ~1/3 filled with liquid and the other contained 2-4" of liquid. Both of the containers previously used to contain ArmaKleen product, which is a caustic material classified as a DOT Class 8, and both of the container's bung caps were not in place. The liquid was clear and appeared to be rainwater which had accumulated in the previously empty containers. Mr. Hetu explained that the liquid would be checked for pH prior to disposal. All empty containers should be managed so that rainwater cannot leak into the containers.

- There was one 55-gallon satellite accumulation container (SAA), which is maintained on the Dock & Fill Building's drum rinsing unit. The container is managed as a hazardous waste flammable liquid and was not labeled at the time of the inspection. There was also two additional black colored metal 55-gallon containers located next to the SAA container. One of which was full and labeled as hazardous waste, but the container was not properly marked with an accumulation start date at the time of the inspection. The other container also seemed to be full, but this container was not labeled with the contents. Mr. Hetu was able to determine that this container held used aqueous non-hazardous waste cleaner at the time of the inspection. Mr. Hetu also properly labeled the SAA container at the time of the inspection and explained that the full hazardous waste container will be dated and moved to the hazardous waste storage area.

There was also one 250-gallon container labeled as non-hazardous waste cleaning compound. The container was ~half filled with liquid but was located on the concrete pad below the Dock & Fill Building loading dock, which does not provide any secondary containment. Mr. Hetu explained that the facility ran out of propane fuel for the site forklift in the past day or so, which was the reason for the failure to move the containers, listed in this comment, to their proper storage areas.

 Safety-Kleen Charlotte Representative Date 2/27/14

cc: Raleigh RI Files  
Safety-Kleen Systems  
On-Site RI Program Files

**J. Sean Morris**

Digitally signed by J. Sean Morris  
DN: cn=J. Sean Morris, o=NCDENR, ou=NC  
HWS, email=sean.morris@ncdenr.gov, c=US  
Date: 2014.02.27 15:18:16 -05'00'

J. Sean Morris, HWS-Environmental Senior Specialist Date