

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: J. Sean Morris

Facility ID Number: NCR000165548

Facility Name: Lincoln County Schools-Warehouse 1

Document Group: Inspection/Investigation (I) **Document Type:** I - Compliance Evaluation Inspection (CEI)

Description for File (for CARA): Compliance Inspection

Date of Document: 6/3/2014

Author(s) of Document: J. Sean Morris

Inspector ID #: NC046

Suborganization: Western Region

Comments for RCRAInfo: Compliance Inspection

County (if not on report): Lincoln

For Violations:

Enforcement Date: [Click here to enter a date.](#)

Docket Number:

Enforcement Type:

How many violations were there?

For IANOV or CO: The facility is

Outcome Measures for CSE for IANOV or CO:

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells



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

RCRA INSPECTION REPORT

1. **Facility Information:** Lincoln County Schools (Warehouse #1)
127 Bethel Church Road
Lincolnton, NC 28092
EPA ID#: NCR 000 165 548

Mailing Address: P.O. Box 400
Lincolnton, NC 28093
2. **Facility Contact:** Mr. Randy Putnam, Lincoln County Schools-Maintenance Director
Phone: 704.736.4200 Email: RPutnam@lincoln.k12.nc.us
3. **Survey Participants:** Mr. Randy Putnam, Lincoln County Schools-Maintenance Director
4. **Inspector(s):** Mr. Sean Morris, HWS-Environmental Senior Specialist
Mr. Brent Burch, HWS-Western Area Supervisor
5. **Date/Time of Inspection:** June 3, 2015 / Arrived : 1:05pm Departed: 3:42pm
Date of Report: July 7, 2015 – Prepared By: Sean Morris (Inspector)
6. **Purpose of Inspection:** Determine Compliance with NC Hazardous Waste Rules/Regulations
7. **Report:**

On June 3, 2015 Mr. Brent Burch and I conducted a compliance inspection at the Lincoln County Schools, Warehouse 1 facility located in Lincolnton, NC. The inspection was conducted as a follow-up to a compliance assistance inspection conducted on March 17, 2015. The facility operates as the central maintenance office for the School system's maintenance personnel. We met with Mr. Randy Putnam, Maintenance Director, during the visit.

Mr. Putnam explained that there are currently 19-employees within the Maintenance Department, which provide maintenance services for twenty four public schools and six County owned & operated buildings, located throughout Lincoln County. The facility includes two buildings, which are referred to as Warehouse 1 & Warehouse 2, that are respectively 10,208 & 2,992 square feet in size. The buildings are connected to the County POTW for water and sewer services. There is one known water supply well onsite that is not in operation and the facility is bordered by residential properties.

The facility generates hazardous waste from onsite crushing of used fluorescent lamps, which are collected through routine maintenance of County owned buildings. Mr. Putnam explained that small quantities of used lamps are routinely collected by Maintenance Department personnel from County owned schools/buildings and are brought to one of two facilities for consolidation/crushing. Mr. Putnam explained that Warehouse 1 has been designated for consolidation/crushing of lamps generated from schools/buildings located in the eastern portion of Lincoln County and Warehouse #3 (NCR 000165 555) has been designated for consolidation/crushing of lamps generated from schools/buildings located in the western portion of Lincoln County.

Used lamps are crushed at the Warehouse 1 facility using one crushing device designed to crush & deposit broken glass into a 55-gallon metal, open-top container. The device is equipped with a vacuum system and air filtration system to minimize dust generated during crushing.

The Warehouse 1 facility notified as a small quantity generator (SQG) in March 2015. Based on a review of the facility's hazardous waste manifests, the facility operated as a small quantity generator (SQG) of hazardous waste during State fiscal years 2013, 2014 & 2015. The facility began operating as a conditionally exempt small quantity generator (CESQG) in May 2015 after designation of Warehouse 3 to manage crushed lamps from half of the County's schools/buildings (See Comment Section). The facility has paid pass due 2013 & 2014 SQG fees.

Mr. Putnam explained that intact used lamps, such as HID's & CFL's, which can't be placed in the crushing unit, have historically been placed into containers with crushed lamps and managed as D009 hazardous waste but that the lamps maybe manage as universal waste in the near future. Used batteries are managed as universal waste except for various sized lead/acid batteries, which are directed to Interstate Battery for a core credit. Mr. Putnam provided documentation to demonstrate that universal/hazardous waste training is provided to applicable personnel.

During the inspection Mr. Putnam explained that the school system had conducted a county wide inventory and clean-out of waste lab chemicals from various schools in 2013. The associated hazardous waste manifest (Tracking Number: 005035583 FLE) indicated that approximately 800-pounds of various D & U-listed hazardous waste was collected from East Lincoln High School on March 21, 2013. Mr. Putnam explained that Ms. Linda Yoder, Lincoln County Schools-Science Lead Teacher, coordinated the clean-out and associated waste inventory log sheets were available for review.

8. Hazardous Waste Type(s):

- D009, hazardous waste solid (crushed lamps)
- Various D & U-listed lab-pack chemicals

9. Areas of Inspection:

Manifests:

The facility's hazardous waste manifests were reviewed at the time of the inspection. The manifests documented approved transporters and TSD facilities. Land Disposal Restriction forms were available.

Transporters: Essential Environmental Services, LLC – NCR 000 142 836 (Used for Lab Clean-Out)
AERC Com, Inc. – VAR 000 502 591(Used for D009 Waste)
Lighting Resources, LLC – FLR 000 070 555

TSDs: Environmental Enterprises, Inc. – OHD 083 377 010 (Used for Lab Clean-Out)
AERC Com, Inc. – PAD 987 367 216 (Used for D009 Waste & Used Batteries)
Giant Resource Recovery – SCD 036 275 626
Environmental Options – VAO 000 122 991

Container Management:

During the visit an inspection of the used lamp management area was conducted. There was one 55-gallon container, equipped with a lamp crusher unit, of D009 crushed lamps within the area. The container was closed, labeled and marked with an accumulation start date. Mr. Putnam maintains documentation to demonstrate the proper maintenance and filter replacement for the lamp crushing unit. Mr. Putnam explained that all used fluorescent lamps are crushed the day they are received at the facility. The area around the crushing unit has been designated as a hazardous waste storage area.

There were two 5-gallon containers of universal waste batteries in the area that were both properly labeled and closed. During the visit we reviewed universal waste container management and training requirements and Mr. Putnam explained that all containers would be properly closed and labeled.

10. Comments:

- It is a reminder that if hazardous waste is received or managed onsite in amounts greater than 220-pounds in a calendar month or more than 2,200-pounds onsite at any one time, the facility would be subject to SQG regulations. The facility must not transport or receive hazardous waste from any other facility that would be considered a SQG or LQG.

**J. SEAN MORRIS, / DATE
NC HWS-COMPLIANCE BRANCH**

**SENT BY US MAIL
FACILITY CONTACT**

CC:
Brent Burch, Western Area Compliance Supervisor
Central Office Files
Randy Putnam, Lincoln County Schools-Maintenance Dept.