

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Andrew Martin - 115
EPA ID: N C S 0 0 0 0 0 0 8 1 9
Facility Name: B & B Used Auto
Document Group: Inspection/Investigation (I)
Document Type: Focused Compliance Inspection (FCI)
Description: MSP Inspection. Verbal Warning
Date of Doc: 2/21/2014
Author of Doc: Andrew Martin

File Room Use Only

Date Recieved by File Room:

Date Scanned:

Month	Day	Year

NCS000000819

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**NC HAZARDOUS WASTE SECTION (NC HWS)
MERCURY SWITCH REMOVAL PROGRAM
COMPLIANCE EVALUATION CHECKLIST/REPORT**

Facility Name: B & B Used Auto Date of Inspection: 2/19/2014

Facility ID Number: NCS000000819

Previous Inspection date(s): 2/25/2013

Facility Generator Status: NAG

County: Mecklenburg

Address: 3500 Hartley Street, Charlotte, NC 28206

Phone: 704-597-8260

Mailing Address (If Different): Same as above

E-Mail Address: AndyBarringer@ATT.net

Owner/Contact: Andy Barringer

Type of Business: Auto Salvage

Number of Cars Dismantled Per Year? 550

Does The Facility Shred On-Site? No

Does The Facility Crush On-Site? Yes

**If YES Do They Own Their Own Crusher?* No

Any evidence of a release (see used oil below) No

Does The Facility OWN or OPERATE A Mobile Crusher? Yes. Drye's Auto Crushing operates a mobile crusher onsite once a year.

MERCURY SWITCH MANAGEMENT

Facility Collecting Mercury Switches: Yes

Evidence of Mercury Release to Environment: **273.13(c)(2)(i)** No

Switches Containerized: **273.13(c)(1)** Yes

Switches In Closed Containers: **273.13(c)(1)** Yes

Containers Properly Labeled: **273.14(d)(1)** Yes

Facility Able To Demonstrate Accumulation Time: **273.15(c)** No

Number of Shipments of Switches: 0

Shipping Papers Maintained: No

Employees Trained In Mercury Handling & Emergency Procedures: **273.13(c)(2)(vi)** No

Mercury Switch Removal Log Maintained: No

Mercury Spill Kit On Site: **273.13(c)(2)(iii)** No

USED OIL MANAGEMENT



Does Facility Generate Used Oil: **279.22(a)** Yes
Stored In: Container(s)
Tanks / Containers Properly Labeled: **279.22(c)(1)** No
Evidence of Used Oil Release: **279.22(b)/279.22(d)** No
Used Oil Disposal Receipts Maintained: No

LEAD / ACID BATTERY MANAGEMENT (266.80)

Does Facility Generate Lead / Acid Batteries: Yes
Batteries Properly Maintained To Prevent a Release: Yes

GASOLINE MANAGEMENT

Does Facility Generate Spent/Waste Gasoline: Yes
Stored In: Container(s)
Total amount of Spent/Waste Gasoline and/or Total Amount On-Site: 50 Gallons
Evidence of Spent/Waste Gasoline Release: No

LEAD WEIGHT MANAGEMENT

Does the Facility Generate Lead Tire Weights: Yes
Does the Facility Manage Weights for Recycling: Yes
*If Yes, How are weights stored: Plastic buckets
Evidence of Weights on the Ground: No

INSPECTION HISTORY

NOD/NOV to Be Issued: No
Verbal Warning (See Comment Section): Yes
Previous Inspection Warning or NOV Issued: No
*If Yes, Type: _____

DEFICIENCIES / CITATIONS:

- None

COMMENTS / RECOMMENDATIONS / Required Actions:

- Used Oil is stored in three 275 gallon plastic totes that are labeled as "Waste Oil." The facility uses the used oil as fuel for their space heater. **It is a reminder that used oil totes should be labeled with the words "Used Oil." Required per 40 CFR Part 279.22(c)(1).**
- Occasionally the facility indicated that it will transfer excess used oil to Carolina Tractor for them to use in their used oil burner. The facility does not maintain documents of the transfer. **It is a reminder that only the used oil that the facility generates or receives from household DIYs is to be burned in the facility's space heater as required per 40 CFR Part 279.23. Additionally off-site shipments of used oil must be performed only by transporters who have obtained an EPA identification number or self-transported in quantities less than 55 gallons, in vehicles owned by the generator or one of its employees; and only transported to**



used oil collection centers. As required per 40 CFR 279.24. Used oil from commercial operations are not accepted at Mecklenburg County Solid Waste operated recycling centers.

- Since joining the program on 7/31/2007, the facility has yet to ship off mercury switches. The bucket contained Three switches. Universal waste-mercury switches must not be stored onsite for more than one year (365 days). **It is a reminder that the facility maintain information to demonstrate compliance with this regulation. The container of mercury switches currently onsite must be shipped for recycling as soon as possible. Required per 40 CFR Part 279.**
- Additional information, regarding shipment of switches and other Program guidance documents can be found at <http://www.eqonline.com/Services-We-Provide/Recycling/ELVS-Mercury-Switch-Program.aspx> and at: <http://portal.ncdenr.org/web/wm/hw/programs/mecuryswitch>
- The facility was given information on how to submit for reimbursement.
- It is a recommendation that the facility develop a checklist to ensure that cars are checked for mercury switches before being sent to the crusher.
- It is a reminder that the facility must maintain a mercury spill kit onsite.
- It is a reminder that the facility must train employees in Mercury Handling & Emergency Procedures.
- Visit <http://www.epa.gov/mercury/spills/#whatnever> for information on mercury releases and spills, including information on items needed to cleanup a small mercury spill.
- It is a reminder that it is a violation of State law to crush or to knowingly allow onsite contractors to crush vehicles that contain mercury switches on B & B Used Auto's property. **Required per NC General Statutes(NCGS) § 130A-310.**
- Statutes can be reviewed at:
http://portal.ncdenr.org/c/document_library/get_file?p_l_id=38491&folderId=325421&name=DLFE-9551.pdf

*Checklist/Report prepared by: Andrew Martin, QEP, NC HWS-Environmental Senior Specialist

Andrew Martin 2-21-14
NC HWS-INSPECTOR / DATE

By Mail
FACILITY CONTACT / DATE

