

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

Facility ID Number: NCD986172476

Facility Name: NOBLE OIL SERVICES, INC.

Document Group: General (G)

Document Type: Other (O)

File Description/Comments: Correspondence and sample results from June 3, 2015 Firestone (Fort Eustis, VA) used oil pickup by Noble Oil (NC)

Date of Document: 6/17/2015

Author(s) of Document: Julie Woosley

Inspector Name: N/A

Suborganization:

County (if not on report): Lee

Patterson, Jenny

From: Woosley, Julie
Sent: Wednesday, June 17, 2015 11:51 AM
To: Williford, Mike; Patterson, Jenny
Subject: FW: Firestone Incident
Attachments: 20150616080637756.pdf; Firestone Mop Water.docx; Firestone mop water results.pdf; Firestone 3 15 Jun 15.jpg; Firestone 1 15 Jun 15.jpg; Firestone 2 15 Jun 15.jpg

Importance: High

FYI,

I received a call this morning (the one that made me late to Jim's event) re this issue and have details. It appears that mop water, which unexpectedly failed TCLP, was inadvertently shipped as non-haz waste from a VA AF military base through Firestone to Noble Oil in Sanford, NC. This happened on June 3 and was identified on June 10. It failed for TCE (8.76 ppm; limit is 0.7). The shipping papers and analytical results are attached. Mr. McKown has already been in touch with VA DEQ.

Please follow up with Noble Oil and keep me in the loop.

Thank you,
Julie

-----Original Message-----

From: Mckown, James E Jr CIV USAF ACC (US) [<mailto:james.e.mckown2.civ@mail.mil>]
Sent: Wednesday, June 17, 2015 11:36 AM
To: Siliva Lisa (lasilvia@deq.virginia.gov)
Cc: James, Paul A CIV USAF (US); Woosley, Julie
Subject: Firestone Incident
Importance: High

Good morning!

How are you?

Been tracking down players and info.

The first attachment (mop water docx) is Chris Burris' statement of the sequence of events. We became aware of the shipment on 10 Jun 15 which took place 3 Jun 15. From what I've been told, is that the local store manager was off the day of shipment and that the Regional Area Manager (Rob Pippen,

252-201-5519) wanted the placed clean up and ordered the shipout.

The second attachment (mop water pdf) is a copy of the analytical results. PERC at 8.76 mg/L.

The third attachment (pdf) is the trip ticket from Noble. I contacted Noble but they wouldn't talk to me and referred me to Quest. Not sure Quest had a clue and I had asked them to provide info on where the wastes were taken, where it was at time, and if it had been disposed. Quest never responded.

The remaining attachments are the pictures you requested.

I notified the DNER this am and gave them your info. (Julie Woosley; julie.woosley@ncdenr.gov) Provided a copy of lab results and copy of trip ticket. Julie was pretty certain on the phone that Noble does not have a permit for D039 disposal and is checking to see if they can transport the same.

Firestone had one Activity Environmental Coordinator, who moved on recently. We were unaware of this until this incident. The current Store Manager is: Sean Jacob; SJacob9214@aol.com; 757-234-7577 and has not been through our training.

The perplexing part of this is when Firestone was setting up their store, we reviewed all of the operations and never saw any chlorinated products. The only HW would be from filter changes. So we were surprised when the mop water took a hit for D039. Paul and I went down to the store Monday, reviewed SDSs and walked around and never found and thing that would indicate the use of chlorinated products. We were still concerned as to whether an F code would apply or not. This cause a little confusion on Chris's part at the time too.

The following is the Firestone Environmental POC:

Debra Hamlin
Retail Environmental Manager
Bridgestone Retail Operations, LLC
333 E. Lake Street
Bloomington, IL 60108
630-259-9379
330-572-5816 (fax)
847-420-8611 (cell)

Firestone operation here fall under our AAFES and the following is their POC:

Melody D Boshaw

Joint Base Langley Eustis Exchange
Store Manager
Langley Express
757-766-1312
boshawm@aafes.com

All Firestone and AAFES personnel have been helpful in finding info and a solution to this to prevent in the future.

Please let us know what else we can provide.

Also, as you know I've had to brief the Supervisors on this, so their immediate concern is are we at fault and is this going to incur a NOV or fines. You know how all of this goes up stream real fast.

Thanks

Jim McKown

Chief, Compliance Branch
Environmental Element (CEIE)
Installation Management (CEI)
Civil Engineer Division (CED)
733D Mission Support Group (MSG)
Joint Base Langley Eustis (JBLE)
757-878-7366
757-878-4589, Fax
james.e.mckown2.civ@mail.mil

JBLE-Eustis Environmental:

<http://www.jble.af.mil/library/hurricaneinformation/index.asp>

CED-AMF-EE Intranet site: <https://post.intranet.eustis.army.mil/enrd/>

ESOHTN: <https://esohtn.com/>

Facebook: www.facebook.com/forteustisenvironment

Please tell us how we are doing through ICE. Click on:

http://ice.disa.mil/index.cfm?fa=site&site_id=439

http://ice.disa.mil/index.cfm?fa=site&site_id=439

"It is a damn poor mind indeed which can't think of at least two ways to spell any word." President Andrew Jackson

Firestone Mop Water

On April 22, 2015 a phone call came in from Sean Jacobs at Firestone asking how to dispose of mop water that Firestone collects in an intermediate bulk container there on site. The mop water is water from a cleaning operation they do once a week to clean the shop floor. This is the 1st time this question has been asked since Firestone is fairly new to the installation. It has taken this long for the IBC to be partially filled to the point that a sample can be taken. On April 23, 2015 a sample was pulled and sent to a local lab on April 28, 2015 for analysis. The sample was being tested for M8260 & M8270, flashpoint, pH, and TCLP 8. This sample was pulled well ahead of time as the tank was only about $\frac{3}{4}$ full thus allowing Firestone more time to fill it before the results were in.

Results were finally received on May 20, 2015.....see attached report. It was hazardous for D039 and pending more information about an F-code being adding. I had spoken with Sean Jacobs who is in charge of operations. I immediately called him when the sample results came in and told him it took a hit for D039 and that it would have to be handled as a hazardous waste. He was informed that this was indeed a hazardous issue and he told me that was getting pressure from his people to get this waste disposed of as soon as possible. I told him drums will have to used to put the wastes in and once done I would be back to pick them up.

On May 21, 2015 drums were delivered to Firestone (6 x 55) to transfer the liquid from the IBC. Waiting analysis labels were given to Firestone along with the 6 drums pending the finalization of the profile. Normal procedures would be to have properly filled out labels for each container. However, do to the uncertainty of what profile would be used and that not all drums may not be filled, or what date he would start to the transfer Mr. Jacobs was just handed the labels and when pumping was to start that at that time each container would be labeled. These drums were placed there in front of the IBC.

Once received back at the hazardous waste accumulation facility and a correct profile was chosen then at that time proper shipping labels would be filled out and applied.

After several days had passed a call was made on June 15, 2015 to find out if indeed the drums were now ready to be picked up and disposed of. Come to find out that as of June 10, 2015 a pump truck was sent to clean out the tank instead of putting them into the drums.

An investigation is being done to find out what further steps are needed.

Christopher T. Burris

6-15-15

REPORT OF ANALYSIS

CLIENT: Fort Eustis
 ATTN: Jim McKowan
 ADDRESS: 1407 Washington Blvd.
 CITY: Ft. Eustis, VA 23604
 PHONE: (757) 878-3915
 FAX: (757) 878-3384

SAMPLE RECEIPT
 DATE: 4/28/2015 TIME: 1601
 GRAB COLLECTION
 DATE: 4/24/2015 TIME: 0900
 COLLECTED BY: CLIENT
 PICK UP BY: CLIENT
 NUMBER OF CONTAINERS: 3



SPECIAL NOTES:

GOOD CONDITION Good Other (See C-O-C)

REPORT NO: 15-06235 16:33

Hazardous Waste

SAMPLE ID: A150272

SAMPLE NO 15-06235

Parameter	EPA HW No.	Method Number	JRA QL	Regulatory Level	Result	Unit	Analyst/Date/Time
Diethyl phthalate		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
4-Bromophenyl phenyl ether		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
1,2,-Diphenylhydrazine		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
4-Nitroaniline		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Diphenylamine & Nitrosodiph		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
4,6-Dinitro-2-methylphenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Benzo[g,h,i]perylene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
4-Chlorophenyl phenyl ether		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Phenanthrene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2,4-Dinitrotoluene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Dibenzofuran		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
4-Nitrophenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2,4-Dinitrophenol		8270D	0.2		< 0.2	mg/L	CLH 05/08/15 0400
3-Nitroaniline		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Acenaphthene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Fluorene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Butyl benzyl phthalate		8270D	0.05		1.45	mg/L	CLH 05/08/15 0400
Dibenz[a,h]anthracene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Indeno[1,2,3-c,d]pyrene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400

James R. Reed & Associates
 770 Pilot House Drive, Newport News, VA 23606
 (757) 873-4703 • Fax: (757) 873-1498

VELAP# 460013
 EPA# VA00015



REPORT OF ANALYSIS

SAMPLE ID: A150272

SAMPLE NO 15-06235

Parameter	EPA HW No.	Method Number	JRA QL	Regulatory Level	Result	Unit	Analyst/Date/Time
Benzo[b]fluoranthene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Di-n-Octyl phthalate		8270D	0.05		0.239	mg/L	CLH 05/08/15 0400
Chrysene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Benzo[a]anthracene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Hexachlorobenzene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
3,3'-Dichlorobenzidine		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Pentachlorophenol		8270D	0.1		< 0.1	mg/L	CLH 05/08/15 0400
Pyrene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Benzidine		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Fluoranthene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
di-n-Butyl phthalate		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Anthracene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Acenaphthylene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Bis(2-ethylhexyl) phthalate		8270D	0.05		0.827	mg/L	CLH 05/08/15 0400
1,3-Dichlorobenzene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2,6-Dinitrotoluene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Nitrobenzene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Hexachloroethane		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Bis(2-chloroisopropyl) ether		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
o-Cresol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Benzyl alcohol		8270D	0.05		0.286	mg/L	CLH 05/08/15 0400
N-Nitroso-di-n-propylamine		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
1,4-Dichlorobenzene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Isophorone		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Bis(2-chloroethyl) ether		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2-Chlorophenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Phenol		8270D	0.05		0.271	mg/L	CLH 05/08/15 0400
Aniline		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
N-Nitrosodimethylamine		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400

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SAMPLE ID: A150272

SAMPLE NO 15-06235

Parameter	EPA HW No.	Method Number	JRA QL	Regulatory Level	Result	Unit	Analyst/Date/Time
Pyridine		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
1,2-Dichlorobenzene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Hexachlorobutadiene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Benzo[a]pyrene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2-Nitroaniline		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2-Chloronaphthalene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2,4,5-Trichlorophenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2,4,6-Trichlorophenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Hexachlorocyclopentadiene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
m,p-Cresol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
4-Chloro 3-methylphenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Dimethyl phthalate		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
4-Chloroaniline		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
1,2,4-Trichlorobenzene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2,4-Dichlorophenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Bis(2-Chloroethoxy)methane		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2,4-Dimethylphenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2-Nitrophenol		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
2-Methylnaphthalene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Carbazole		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Naphthalene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Benzo[k]fluoranthene		8270D	0.05		< 0.05	mg/L	CLH 05/08/15 0400
Ethylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,1,2,2-Tetrachloroethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Bromobenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Isopropylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Bromoform		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Styrene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
o-Xylene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407

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REPORT OF ANALYSIS

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SAMPLE NO 15-06235

Parameter	EPA HW No.	Method Number	JRA QL	Regulatory Level	Result	Unit	Analyst/Date/Time
Trans-1,3-Dichloropropene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,1,1,2-Tetrachloroethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
2-Chlorotoluene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Chlorobenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Dibromochloromethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
2-Hexanone		8260B	0.5		< 0.5	mg/L	SDT 05/04/15 0407
Tetrachloroethene		8260B	0.5		8.76	mg/L	SDT 05/05/15 1533
m&p-Xylene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,3-Dichlorobenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,2,4-Trichlorobenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Naphthalene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Hexachlorobutadiene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,2,3-Trichlorobenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,2-Dichlorobenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
N-Butylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
n-Propylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
4-Isopropyltoluene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,2,3-Trichloropropane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Sec-Butylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,2,4-Trimethylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Tert-Butylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
4-Chlorotoluene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,3,5-Trimethylbenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,1,2-Trichloroethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,4-Dichlorobenzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Trichlorofluoromethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,1-Dichloroethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
trans-1,2-Dichloroethene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Toluene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407

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SAMPLE NO 15-06235

Parameter	EPA HW No.	Method Number	JRA QL	Regulatory Level	Result	Unit	Analyst/Date/Time
Carbon Disulfide		8260B	0.5		< 0.5	mg/L	SDT 05/04/15 0407
1,3-Dichloropropane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
2,2-Dichloropropane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,1-Dichloroethene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Methylene Chloride		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Chloroethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Bromomethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Vinyl chloride		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Chloromethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
pH (lab)		**4500H+			6.12@15oC	s.u.	EFA 04/28/15 1640
Dichlorodifluoromethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Acetone		8260B	0.5		< 0.5	mg/L	SDT 05/04/15 0407
Bromodichloromethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
4-Methyl-2-Pentanone (MIBK)		8260B	0.5		< 0.5	mg/L	SDT 05/04/15 0407
cis-1,3-Dichloropropene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Iodomethane		8260B	0.1		< 0.1	mg/L	SDT 05/04/15 0407
2-Chloroethyl Vinyl Ether		8260B	0.1		< 0.1	mg/L	SDT 05/04/15 0407
cis-1,2-Dichloroethene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Dibromomethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,2-Dichloropropane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Trichloroethene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
2-Butanone (MEK)		8260B	0.5		< 0.5	mg/L	SDT 05/04/15 0407
Benzene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,1-Dichloropropene		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Carbon Tetrachloride		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,1,1-Trichloroethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Chloroform		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
Bromochloromethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407
1,2-Dichloroethane		8260B	0.05		< 0.05	mg/L	SDT 05/04/15 0407

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REPORT OF ANALYSIS

SAMPLE ID: A150272

SAMPLE NO 15-06235

Parameter	EPA HW No.	Method Number	JRA QL	Regulatory Level	Result	Unit	Analyst/Date/Time
Flashpoint		1010A			>100	oC	ARC 04/30/15 1150
Toxic Characteristic Leaching Procedure by SW-846 Method 1311							
Arsenic	D004	6010C	0.005	5	0.006	mg/L	PEJ 05/04/15 1316
Barium	D005	6010C	0.005	100	0.780	mg/L	PEJ 05/04/15 1316
Cadmium	D006	6010C	0.0005	1	0.0285	mg/L	PEJ 05/04/15 1316
Chromium	D007	6010C	0.001	5	0.087	mg/L	PEJ 05/04/15 1316
Lead	D008	6010C	0.005	5	0.375	mg/L	PEJ 05/04/15 1316
Mercury	D009	7470A	0.0002	0.2	< 0.0002	mg/L	PEJ 05/06/15 1247
Selenium	D010	6010C	0.005	1	0.011	mg/L	PEJ 05/04/15 1316
Silver	D011	6010C	0.001	5	< 0.001	mg/L	PEJ 05/04/15 1316

NOTES:

JRA Quantification Level is the concentration of the lowest calibration standard above zero with a reliable signal.

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The results on this report relate only to the sample(s) provided for analysis.

Results conform to NELAC standards, where applicable, unless otherwise indicated.

Flashpoints <60oC are considered hazardous according to Hazardous Waste Characterization Guidelines.

email: paul.a.james8.civ@mail.mil

cc: Bhate Environmental, Attn: David Badio

1608 13th Avenue South, Suite 300

Birmingham, AL 35205

phone: (205) 918-4000

email: dbadio@bhate.com

Invoice: Bhate Environmental

Authorized By: Elaine Claiborne
 Elaine Claiborne, Laboratory Director
 Date: 20-May-15

James R. Reed & Associates
 770 Pilot House Drive, Newport News, VA 23606
 (757) 873-4703 • Fax: (757) 873-1498

VELAP# 460013
 EPA# VA00015





CHAIN OF CUSTODY

ANALYSES REQUESTED

Company Name: BHATE (FT. EUSTIS)
 Company Contact: David Badio Telephone: 703-371-9824
 Results To: dbadio@BHATE.COM Fax: _____
 Address: _____
 Project ID: _____

Bottle ID	A	A	B1-2	A														
Preserv.																		
										TCLP 8	FP	PH	m8260	m8270				
										✓	✓	✓	✓	✓				

JRA ID #	Sample Type*	Sample Location	Composite				Grab		Total # of cont.										
			Start Date	Start Time	End Date	End Time	Date	Time											
06235	HW	A150272					4/24/15	9am	3	✓	✓	✓	✓	✓					

*WW= Wastewater, GW = Groundwater, DW - Drinking Water, HW - Hazardous Waste, OTHERS

Sampled By: [Signature] Date/Time: 4/23/15 9am
 Relinquished By: [Signature] Date/Time: 4/28/15 10am
 Received By: William D. Barnard Date/Time: 4-28-2015 10:07 AM
 Relinquished By: William D. Barnard Date/Time: 4-28-2015 4:00 PM
 Received By: Barbara Starke Date/Time: 4-28-15 @ 1601

Preservatives:
 1 = <6°C 6 = Na₂SO₃ + HCl 10=Ascorbic Acid + HCl
 2 = HNO₃ 7 = NaOH + ZnOAc 11=HCl
 3 = H₂SO₄ 8 = H₂SO₄ + FAS 12=Zinc Acetate + NaOH
 4 = NaOH 9 = NH₄Cl
 5 = Na₂S₂O₃

____ for Compliance
 ____ Not for Compliance

Metals to be preserved upon receipt to the lab.

Arrival Temp: 5.7 °C

JAMES R. REED and ASSOCIATES (757) 873-4703; FAX (757) 873-1498
 770 Pilot House Drive, Newport News, VA 23606

PRECISION PETROLEUM LABS, INC.

CERTIFICATE OF ANALYSIS

LABORATORY ADDRESS 5915 Star Lane, Houston, TX 77057 Ph. 713-680-9425 Fax: 713-680-9564 Website: precisionlabs.org	Client Name: Noble Oil Services, Inc Street Address: 5617 Cylde Rhyne Dr City, State, Zip: Sanford, NC 27330
--	---

INVOICE No.	62387	DATE RECEIVED	09-12-2014
LAB REFERENCE No.	2014-09-377	DATE/TIME COLLECTED	09-09-2014@0900
AUTHORIZED BY	Mark Giaquinto	MATRIX TYPE	Liquid
PRODUCT ID	Used Oil From [REDACTED]		

<u>Volatile</u>	<u>Test</u>	<u>Reporting</u>	<u>Results</u>
<u>Organics</u>	<u>Method</u>	<u>Limit, PPM</u>	<u>PPM</u>
Bromodichloromethane	S.W. 8260	1.00	BRL
Bromoform	S.W. 8260	1.00	BRL
Methylene Chloride	S.W. 8260	1.00	BRL
Bromomethane	S.W. 8260	1.00	BRL
Carbon tetrachloride	S.W. 8260	1.00	BRL
Chloroethane	S.W. 8260	1.00	BRL
2-Chloroethyl Vinyl Ether	S.W. 8260	1.00	BRL
Chloroform	S.W. 8260	1.00	BRL
Chloromethane	S.W. 8260	1.00	BRL
Dibromochloromethane	S.W. 8260	1.00	BRL
Chlorobenzene	S.W. 8260	1.00	BRL
1,2-Dichlorobenzene	S.W. 8260	1.00	BRL
1,3-Dichlorobenzene	S.W. 8260	1.00	BRL
1,4-Dichlorobenzene	S.W. 8260	1.00	BRL
1,1-Dichloroethane	S.W. 8260	1.00	BRL
1,2-Dichloroethane	S.W. 8260	1.00	BRL
1,1-Dichloroethene	S.W. 8260	1.00	BRL
trans-1,2-Dichloroethene	S.W. 8260	1.00	BRL
Dichloromethane	S.W. 8260	1.00	BRL
1,2-Dichloropropane	S.W. 8260	1.00	BRL
Cis-1,3-Dichloropropene	S.W. 8260	1.00	BRL
trans-1,3-Dichloropropene	S.W. 8260	1.00	BRL
1,1,2,2-Tetrachloroethane	S.W. 8260	1.00	BRL
Tetrachloroethene	S.W. 8260	1.00	BRL
1,1,1-trichloroethane	S.W. 8260	1.00	BRL
1,1,2-Trichloroethane	S.W. 8260	1.00	BRL
Trichloroethene	S.W. 8260	1.00	BRL
Trichlorofluoromethane	S.W. 8260	1.00	BRL

Daniel Zabihi
QA Manager

Date: 09-15-2014


 PRIMARY ACCREDITATION TCEQ, #T104704203-TX
 ARIZONA LICENSE # AZ0630

QUALIFIERS & ABBREVIATIONS: BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Matrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance limits. Test deviation applied to Method 8260 (VOCs).

COMMENTS: There were no quality assurance anomalies associated with these tests.

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS, OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT. RESULTS ARE REPORTED ON AN "AS IS" BASIS, UNLESS OTHERWISE NOTED. THE TEST RESULTS RELATE ONLY TO THE SUBMITTED SAMPLE IDENTIFIED ON THIS REPORT. TEST RESULTS MEET ALL REQUIREMENTS OF NELAC FOR TESTS LISTED ON THE LABORATORY'S CURRENT FIELDS OF ACCREDITATION (EPA 1010, 6010, 8082, 8260, and 9075).

PRECISION PETROLEUM LABS, INC.

5915 STAR LANE
HOUSTON, TX 77057
PH 713-680-9425 FAX: 713-680-9564
WEBSITE: PRECISIONLABS.ORG

CHAIN OF CUSTODY

PROJECT NAME AND LOCATION

LABORATORY ANALYSIS



CLIENT NAME

Noble Oil Services Inc.

SAMPLE DESCRIPTION

Used Oil

DATE

9-9-14

TIME

0900

- Gravity API @ 60°F
- Flash Point PMCC or COC
- Sulfur
- Ash
- Total halogens EPA-9075
- PCB's
- Water by Distillation or KF
- PURITY BY GC/FID OR IN-HOUSE METHOD
- BTU's
- As, Cd, Cr, Pb
- Viscosity @
- Pour point
- Sediment by Extraction
- 8260 Halogenated voc's (rebuttal)
- Metals (8 RCRA) Total or TCLP
- Volatiles Total or TCLP
- Semi-volatiles Total or TCLP
- Pesticides & herbicides Total or TCLP
- Total petroleum hydrocarbons
- BTEX
- Distillation D-86 OR D-1160
- FULL BIODIESEL D-6751 OR EN
- TOX EPA-9020 OR EOX EPA-9023
- FREE&TOTAL GLYCERIN
- COMPLETE FUEL OIL TESTING
- RUSH (FEE EQUALS TESTING CHARGES)

SPECIAL INSTRUCTIONS

TRANSFER NUMBER

(1)

TRANSFER RELINQUISHED BY:

Ry. Francis

ACCEPTED BY

SFP 12/2/2014

PRECISION PETROLEUM LABS, INC.

DATE

TIME

9:45 AM

ALS(PLEASE CIRCLE): AG, AL, BA, BE, B, CA, CO, FE, PB, MG, MN, HG, MO, NI, P, K, SE, SI, NA, TL, SN, TI, V, ZN

K2

THIS IS NOT AN INVOICE

Document No. 1182660

FOR EMERGENCY RESPONSE:
Call: CHEMTREC for Spill, Leak, Accident
1-800-424-9300
24 HRS. PER DAY, 7 DAYS PER WEEK



1-800-662-5364
5617 CLYDE RHYNE DR.
SANFORD, NC 27330
EPA ID# NCD 986172476

DATE 6/3/15

SERVICE RECEIPT

CUST ID# R344614
Work Order # 1054897

GENERATOR
CUSTOMER Bridgestone (Firestone) #344614 QUEST
ADDRESS 1383 Bldg 1383 Los Blvd
CITY FORT BUSTIS STATE VA ZIP 23804
CONTACT SERVICE MANAGER
PHONE 757-234-7577 Ext. EPA ID#
START TIME: STOP TIME:
COUNTY NEWPORT NEWS (CITY)

BILLING
CUSTOMER QUEST RESOURCE MANAGEMENT GROUP
ADDRESS 8175 MAIN STREET SUITE 420
CITY FRISCO STATE TX ZIP 75034
CONTACT CUSTOMER SERVICE
PHONE 877-321-1811
PO# TRUCK # 137
Region: Fredericksburg to Woodbridge ZONE 73

PARTS WASHER SERVICE FILTER BIN SERVICE INDUSTRIAL SERVICES RECOVERY SERVICES

Table with columns: HM, US DOT Description, Cap/Tanks, Freq, Profile, Quantity, Service Charge, TOTAL. Includes handwritten entries for 'Waste Water, not US DOT or RCRA Regulated Water' and '282 Gallon'.

Method of Payment Credit Card / Check / Cash / PO Amount Recd Total Qty: Subtotal Sales Tax Service Charge TOTAL DUE \$

NOBLE OIL EPA ID#: NCD9861-72476

Generator Certification and Indemnification:

I, the generator of the materials identified above, certify that these materials are accurately and fully characterized, described, classified, packaged, marked and labeled and are in the proper condition for transport in compliance with applicable State, U.S. EPA and U.S. Department of Transportation (DOT) regulations.

Oil Screen Test: Positive Negative N/A Confirmation Test: Type Results ppm

Authorized Customer Agent (Sign) X / (Print) [Signature]

Noble Oil Services Agent (Sign) X / (Print) [Signature]

Comments:

WO Contact:

Tank Location:

Spec Inst: Quest called in 400-gallons of water only

Route: 733

Sta #: 9

MOP: Invoice Service:

CUSTOMER COPY

Order Trace Card

ROB PIPPEN
AREA MANAGER.
252-202-5519.

SEAN JACOB

646-919-8832

The Conditionally Exempt Small Quantity Generator Defense

- ❖ The Bridgestone facility (where Noble Oil Services collected the oily wastewater) has no hazardous waste container on the premises – only totes for oily wastewater and used oil.
- ❖ To the best of our knowledge it has no EPA ID number.
- ❖ This facility generates used oil and oily wastewater as part of its normal vehicle maintenance activities.
- ❖ To the best of our knowledge, no entity (including Quest) picks up any hazardous waste at this Bridgestone facility.
- ❖ Consequently, it is a valid conclusion that this facility is a conditionally exempt small quantity generator. 40 CFR 261.5. Therefore, any hazardous waste that it did generate (provided it was less than 220 pounds per month) is exempt from the hazardous waste regulations. 40 CFR 261.5(b).

Rebuttable Presumption Defense

- ❖ As you know, Noble Oil Services collects and processes used oil and oily wastewater. We do not handle hazardous waste. Our contract with Quest only covers used oil (including oily wastewater).
- ❖ The Bridgestone facility has no hazardous waste container on the premises – only totes for oily wastewater and used oil. This facility generates used oil and oily wastewater as part of its normal vehicle maintenance activities.
- ❖ The used oil regulations including the rebuttable presumption apply to Noble Oil in this situation. If we had picked up oily water with 1000 parts per million of total halogens we would have to deal with the rebuttable presumption.
- ❖ Used oil containing more than 1000 parts per million (“ppm”) of total halogens is presumed to be mixed with a listed hazardous waste. 40 CFR §279.10(b)(1)(ii).
- ❖ In this situation, the laboratory analysis of the Bridgestone facility oily “mopwater” (that Noble Oil collected) indicated only 8.7 ppm of a halogenated compound. Even if the concentration was 100 times greater the rebuttable presumption would not have been triggered. Consequently, the oily water Noble Oil picked up can and should be managed under the used oil management standards – not as a hazardous waste.

Noble Oil Services Is Entitled to Rely on the Generator's Waste Characterization.

In this situation, the generator characterized the material to be collected as non-hazardous wastewater (non RCRA regulated) and certified that this information was correct. There was no indication that the material was hazardous. Under the RCRA rules in this situation, Noble Oil Services may rely on the generator's determination that the material was non-hazardous.

From RCRA's inception¹ and under the RCRA regulations that have been in effect since 1980 the generator has the non-delegable duty to determine whether his wastes are hazardous. 40 CFR §262.11; *Park v. Burlington Northern Santa Fe Railway Co.*, 108 Cal. App 4th, 595, 609 (2003). All other responsibilities in RCRA's cradle-to-grave system flow from that all-important characterization required of the generator.

EPA has adamantly maintained for 35 years that the generator's waste "determination is the crucial, first step in the regulatory system, and the

¹ According to the House of Representatives report on the legislation that became RCRA, "The basic thrust of the hazardous waste title, is to identify what wastes are hazardous and in what quantities, qualities, and concentrations and the methods of disposal which may make such wastes hazardous. The title requires that the Administrator promulgate regulations applicable to generators. Such regulations include recordkeeping, informing those that transport or dispose of such hazardous waste of the characteristics of such waste and the initiating of a manifest system so that the waste generated can be traced to the site of ultimate disposal. This mechanism gives both the generator and enforcement agency knowledge of the final disposal of the material." H.R. REP. 94-1491, 6, 1976 U.S.C.C.A.N. 6238, 6244)

generator must take this responsibility seriously.” 45 Fed. Reg. 12727 (February 28, 1980). The EPA also emphasized that the generator has “a continuing responsibility to know whether his wastes are hazardous.” 45 Fed. Reg. 12727.

A 1985 decision by the Court of Appeals for the Eleventh Circuit addressed the question of whether a transporter had any responsibility to verify information provided by the waste generator. The Court ruled that

the determination that a solid waste is hazardous within the meaning of the regulations [40 C.F.R. Sec. 262.11]...must be made by the person who generates the waste.

Here the railroad carriers were told by Uniroyal that, although the car last contained substituted nitrophenol, it was presently empty. We find no duty under EPA or DOT regulations which would require the carrier to verify such a representation. *Accordingly, we agree with the district court that EPA and DOT regulations do not impose upon a transporter a duty to determine if a hazardous waste is present when the generator states that it is not.* [emphasis added.]

Crockett v. Uniroyal, Inc., 772 F.2d 1524, 1533 (11th Cir. 1985)

In a 1994 EPA administrative decision involving manifests filled out by the generator, where the wastes were not properly characterized, EPA pointed out “that the manifest is the key to the RCRA objective of ‘cradle to grave’ management of hazardous waste. Therefore, having the correct

information on the manifest, particularly the type of waste being transported for disposal, is of paramount importance to the objectives of the RCRA program. Thus, the Complainant [EPA] contends that that the failure to properly classify the waste places people and the environment at great risk because of the potential for improper handling and improper response tactics in the event of an accident or emergency.” EPA also asserted that “generators are responsible for determining whether their wastes are restricted from land disposal and, accordingly, must ensure that the manifest is accompanied by the proper notification.” *In the Matter of ROI Development Corporation*, Docket No. RCRA (3008) VIII-90-12, March 31, 1994, [citations omitted], pp. 11-12



June 22, 2015

Jenne S. Walker, Environmental Senior Specialist
Compliance Branch, Hazardous Waste Section, Division of Waste Management
North Carolina Department of Environment & Natural Resources
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Dear Ms. Walker:

Please find our response to the questions asked of Noble Oil Services, Inc. by Lisa Silva of the Virginia Department of Environmental Quality (VA DEQ).

1. Where was the wastewater shipped to?

The wastewater was collected by our used oil route collection truck then off loaded to our Suffolk, Virginia satellite tank for used oil. The water/used oil was then transported to Noble Oil Services, Inc. facility in Sanford, North Carolina for processing into vacuum gas oil.

2. Was the facility in question number 1 the final destination or a transfer facility?

The final destination was the Sanford, North Carolina processing facility. Both the satellite tank and the facility belong to Noble Oil Services, Inc.

3. Where was the final destination and how was the waste managed at that location?

The final destination is the Sanford, North Carolina facility. The wastewater was co-mingled with the used oil being recycled and entered into the used oil process.

4. Under what regulatory authority or regulation was the waste managed? For example, the facility should list any and all permits held for RCRA Subtitle C, Clean Water Act, or other.

The wastewater was co-mingled with the used oil and would have been handled under 40 CFR 279. Noble Oil Services, Inc. is registered as a used oil processor/re-refiner in North Carolina under EPA ID NCD986172476.

5. Did Noble do any screening of the wastewater before or at pickup in Newport News and then again at final designation? If yes, what and what results?

Wastewater/used oil that was transferred from the satellite tank and taken to the Sanford, North Carolina plant would have been screened prior to being entered into the used oil process using a halogen "sniffer" or a Dexsil kit test to determine whether the used oil or oily water contained 1000 ppm or more of total halogens. In this case, a sniffer was used and there was no indication of total halogens in the range of 1000 ppm. Additionally there was screening done at the facility and that screening resulted in a non-detection of hazardous waste.

I trust that this information fulfills Ms. Silva's request. If we can be of any further assistance, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Yoke P. Chung', with a stylized flourish at the end.

Yoke P. Chung, CHMM, C-MESH
Manager of Environmental Health and Safety
Noble Oil Services, Inc.

Patterson, Jenny

From: Walker, Jenne
Sent: Thursday, August 27, 2015 5:33 PM
To: Patterson, Jenny
Subject: FW: resolution to June 2015 incident with Firestone #344614 (Fort Eustis VA)

Fyi, I just remembered to forward this! Sorry about the delay!

Jenne S. Walker, Environmental Senior Specialist
Compliance Branch, Hazardous Waste Section, Division of Waste Management (DWM)
North Carolina Department of Environment & Natural Resources (NC DENR)
1646 Mail Service Center
Raleigh, NC. 27699-1646
(919) 707-8224 – office telephone; jenne.walker@ncdenr.gov

<http://portal.ncdenr.gov>

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From: [Jim Noble](#)
Sent: 8/26/2015 8:04 AM
To: [Walker, Jenne](#)
Cc: [Bryan Anderson](#); [Yoke Chung](#); [Rich Kalin](#)
Subject: RE: resolution to June 2015 incident with Firestone #344614 (Fort Eustis VA)

Ms. Walker,

Thank you for your patience and hard work bringing this to a closure..

Let us know how we can be of assistance to you in the future..

Thanks Again,
JIM

From: Walker, Jenne [mailto:jenne.walker@ncdenr.gov]
Sent: Tuesday, August 25, 2015 10:21 AM
To: Jim Noble
Subject: resolution to June 2015 incident with Firestone #344614 (Fort Eustis VA)

Hello Mr. Noble,
Virginia DEQ (Dept of Environmental Quality) determined that the Firestone # 344614 which is located at Building 1383, 13th Street, Fort Eustis, VA 23604 was operating as a Conditionally Exempt Small Quantity Generator (CESQG) at the time of the June 2015 incident. As such, the North Carolina Hazardous Waste Section requires no further information or action from Noble Oil concerning this incident.

Thank you for your cooperation regarding this matter and please contact me if you have any questions or concerns.
Jenne Walker

Jenne S. Walker, Environmental Senior Specialist
Hazardous Waste Section – Division of Waste Management
North Carolina Department of Environment & Natural Resources (NC DENR)
1646 Mail Service Center
Raleigh, NC 27699-1646
Office & fax: 919-707-8224
jenne.walker@ncdenr.gov

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