

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

**Your Name:** Andrew Martin

**Facility ID Number:** NCS000002311

**Facility Name:** Concrete Supply Company, LLC - Concord

**Document Group:** Inspection/Investigation (I)

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

**File Description/Comments:** Multimedia Inspection

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**Author(s) of Document:** Andrew Martin

**Inspector ID #:** NC115

**Suborganization:** Western Region

**County (if not on report):** Cabarrus

**NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF WASTE MANAGEMENT (DWM) HAZARDOUS  
WASTE SECTION (HWS) / COMPLIANCE BRANCH**

**RCRA INSPECTION  
REPORT**

1. **Facility Information:** Concrete Supply Company, LLC - Concord  
470 McGill Avenue  
Concord, NC 28027  
EPA ID#: NCS000002311
2. **Facility Contact:** Mr. Johnie Alexander  
Phone: 704-372-2930
3. **HWS-Inspectors:** Mr. Andrew Martin, NC HWS-Environmental Senior Specialist
4. **Date/Time of** April 18, 2016 Arrived: 10:00 am – Departed: 1:00pm  
**Date of Report:** April 28, 2016 - Prepared By: Andrew Martin
5. **Participants:** Johnie Alexander, Concrete Supply LLC  
Mooresville Regional Office Multimedia Team 1

6. **Purpose of Inspection:** Compliance Evaluation Inspection

7. **Report:**

On April 18, 2016, a multimedia inspection at the Concrete Supply Company, LLC –Concord facility was conducted. The Concrete Supply Company, LLC –Concord facility is a ready mix concrete batch plant. The facility is currently operating as a Conditionally Exempt Small Quantity Generator (CESQG).

A tour of facility operations was conducted during the visit. The facility generates used oil, used antifreeze, batteries, lamps and potentially aerosol cans. Batteries are exchanged for core recycling. The vehicle maintenance area of the facility also contained a small non-hazardous parts washer serviced by Safety-Kleen.

Used oil is accumulated in an above ground tank and in several smaller containers within the shop area. The tank is located within a secondary containment structure. The smaller containers were not labeled at the time of the inspection (See Comments Section). Receipts for Used Oil recycling is kept onsite.

8. **Deficiencies/Violations:**

None

9. **Comments:**

- During the inspection, several used oil storage containers in the shop area were not labeled with the words “Used Oil.” The facility must label all containers (tanks, drums, buckets, bottles, etc.) used to

store or transport used oil for recycling as "Used Oil" and follow all applicable regulations regarding used oil listed in 40 CFR 279.

- Aerosol cans could be listed as a hazardous waste in one of three ways: 1) the can itself due to reactivity [empty can could detonate or explode], 2) the liquids product contained within the can, and 3) the gaseous propellant. Depending on how the cans are managed will determine if they are excluded or subject to the full hazardous waste regulations. A steel aerosol can that does not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)), and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(iv) if it were to be recycled. The can would need to be punctured and drained in order to be subject to the recycling exemption and the liquids/gases from the puncturing process would need to be managed per the appropriate regulations. It is a reminder that the facility ensure that it is properly managing spent or used aerosol cans.
- Although the facility primarily operates as a conditionally exempt small quantity generator (CESQG) of hazardous waste, it is a reminder that if the facility generates more than 220-pounds of total hazardous waste in any calendar month, or accumulates more than 2,200-pounds of hazardous waste onsite at any one time, the facility will be subject to small quantity generator (SQG) regulations. SQG hazardous waste regulations are listed in Title 40, Code of Federal Regulations, Part 262.34 (c) & (d). If the facility generates more than 2,200-pounds of hazardous waste in any calendar month or accumulates more than 2.2-pounds of acutely toxic (P-Listed) hazardous waste onsite at any one time the facility will be subject to full regulation as a large quantity generator (LQG). LQG hazardous waste regulations are listed in Title 40, Code of Federal Regulations, Part 262. Additionally, LQGs and SQGs must obtain a site EPA Identification Number before offering hazardous waste for off-site transport and disposal. Guidance documents for hazardous waste generators can be found at: <http://portal.ncdenr.org/web/wm/hw/Technical>

*Andrew Martin 4-28-16*

Andrew Martin, QEP / DATE  
NC HWS-COMPLIANCE BRANCH

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FACILITY REPRESENTATIVE