

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

**Your Name:** Jenne Walker

**Facility ID Number:** NCS000002295

**Facility Name:** Mr. G's Store

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**Author(s) of Document:** Jenne Walker

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**Suborganization:** Eastern Region

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



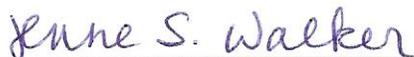
Ms. Walker contacted Mr. Brown by telephone on the afternoon of April 5, 2016 to explain the findings and provide additional instructions. Mr. Brown was instructed to remove the paint chips that have fallen off the building onto the property and containerize the waste paint. Mr. Brown stated that in addition to initial removal, the area around the building (which is primarily surrounded by asphalt) will be routinely checked and any new paint chips will be swept up, removed and containerized. Mr. Brown will store the labeled and closed container (5-gallon bucket) of waste paint chips in a secured area. Ms. Walker explained the Conditionally Exempt Small Quantity Generator regulation requirements to Mr. Brown and a written summary is attached to this report.

**Action Item & Recommendation:**

- Ensure that paint chips that fall off the building are immediately removed and containerized prior to future disposal.
- If the building is re-painted the building in the future, it is strongly recommended that prior to re-painting, the existing paint on the building be properly removed and managed by a licensed lead (paint) abatement contractor in order to eliminate the source. The following is a web link to additional information regarding lead abatement and certified lead abatement contractors:

<http://epi.publichealth.nc.gov/lead/abatement.html>

Please contact Jenne Walker at (919) 707-8224 or via email at [jenne.walker@ncdenr.gov](mailto:jenne.walker@ncdenr.gov) if you have any questions about this report or maintaining compliance with the Hazardous Waste Management (RCRA) Regulations.



Jenne S. Walker

Environmental Senior Specialist, NCDEQ

Signed 4/15/2016

cc: Haz Waste Section – Central Files

Activity Type:

Complaint (04)

FCI-CMP

## Conditionally Exempt Small Quantity Generator (CESQG) Guidance

### **Amount of Hazardous Waste Generated:**

A CESQG generates less than 220 pounds of hazardous waste in a calendar month.

A CESQG generates less than 2.2 pounds of acute hazardous waste in a calendar month.

**Hazardous Waste Determination** (40 CFR 262.11): Hazardous waste determinations must be properly performed. Any waste material in which the facility is uncertain of its identity must either be tested/analyzed or identified by generator knowledge. The facility must ensure that waste determinations are performed in a timely manner and that the material is managed properly during the waste determination process.

**Maximum On-Site Storage Amount** (40 CFR 261.5(a)): As a CESQG, the quantity of waste accumulated on-site must never exceed 2,200 pounds.

**Container Management:** Hazardous waste must be *inside* the hazardous waste container. All spills/releases of hazardous waste must be responded to immediately and appropriately.

### **Proper Treatment and/or Disposal of Hazardous Waste** (40 CFR 261.5(g)(3)):

A CESQG may treat or dispose of hazardous waste in an on-site facility or ensure delivery to an off-site treatment, storage, or disposal facility that is:

- 1) Permitted or in interim status of receiving a permit as a hazardous waste treatment, storage or disposal facility.
- 2) Permitted, licensed, or registered by a State to manage municipal or industrial solid waste  
(*Note: North Carolina solid waste regulation prohibits hazardous waste disposal at a solid waste disposal site*)
- 3) A facility which:
  - a) Beneficially uses or reuses, or legitimately recycles or reclaims its waste; or
  - b) Treats its waste prior to beneficial use or reuse, or legitimate recycling or reclamation;  
(*Note: In North Carolina, recycling facilities must be permitted.*)

### **Recommendations**

#### **It is highly recommended that:**

- All hazardous waste containers are labeled with the words “Hazardous Waste” or words identifying the contents of the containers.
- All hazardous waste containers are kept closed unless waste is being added or removed from the containers.
- The facility should maintain all manifests or bill of ladings indicating that the hazardous waste has been properly shipped and treated or disposed.