

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

Your Name: Jenne Walker

Facility ID Number: NCR000013441

Facility Name: Haddock at Crossroads Collision Center

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: no violations, SQG operating as CESQG

Date of Document: 04/07/2016

Author(s) of Document: Jenne Walker

Inspector ID #: NC028

Suborganization: Eastern Region

County (if not on report): Wake

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

RCRA COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

1. FACILITY INFORMATION:

Facility Name: Haddock at Crossroads Collision Center (dba Caliber Collision)
EPA ID Number: NCR000013441
Type of Facility: listed as Small Quantity Generator (SQG) of hazardous waste
operating as Conditionally Exempt Small Quantity Generator (CESQG)
Facility Location: 1710 Piney Plains Road, Cary NC 27518
Telephone number: 919-388-9783
Mailing Address: same
County: Wake

2. FACILITY CONTACTS: Ms. Brandi Heron, Center Manager – Caliber Collision
Telephone 919-388-9783; email – Brandi.Heron@CaliberCollision.com

Mr. Dan Lantier, Regional Manager – Caliber Collision
Cell – 919-961-3959; email Daniel.Lantier@CaliberCollision.com

3. DATE OF SITE VISIT: April 7, 2016

4. EVALUATION PARTICIPANTS:

Mr. Dan Lantier – Caliber Collision
Ms. Brandi Heron – Caliber Collision
Jenne S. Walker, Environmental Senior Specialist, NC Division of Waste
Management

5. PURPOSE OF SITE VISIT: An inspection was conducted to evaluate the subject facility's compliance with the hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA regulations) which are described at Title 40 of the Code of Federal Regulations (40 CFR), Parts 261-262, 265, 270, 273 and 279, and 15A NCAC 13A.

6. FACILITY DESCRIPTION:

Caliber Collision provides automotive body, paint, interior and glass repair. On-site processes that generate hazardous waste are related to automotive painting. The facility is listed with DWM as a Small Quantity Generator of hazardous waste.

General Information:

- a. Operator of facility: Haddock Collision
- b. Property Owner: Crossroads Holdings LLC, 1101 Buck Jones Rd, Raleigh NC 27606
- c. Operating Shifts: 8am – 5:30pm Monday – Friday

- d. Number of Employees: ~ 33
- e. Water Supply & Sanitary Sewer: Town of Cary
- f. Groundwater Monitoring wells on-site: none
- g. Distance to closest residence: > ¼ mile

7. WASTE STREAMS:

Hazardous waste is generated in the form of waste waterborne paint and still bottoms from the solvent distillation system (solvents are generated from cleaning painting equipment/guns). Prior to installation of the distillation system, the facility generated and shipped waste flammable liquids for disposal.

Hazardous Waste

Waste flammable liquids, toxic – D001, D005, D006, D007, F003, F005

Waste toxic liquids (waterborne paint waste) – D007, D008

Waste toxic solids (still bottoms) - D007, D008

Other Waste: used antifreeze and used oil mixture

8. AREAS OF REVIEW:

An initial interview was conducted with Ms. Heron and Mr. Lantier to gather operational information regarding the facility. A physical inspection of the facility was then conducted, followed by a review of manifests and exit interview.

PHYSICAL INSPECTION/FACILITY WALK-THROUGH

Hazardous materials are stored in a flammable cabinet inside the main storage area. Products and equipment were well organized and the facility appeared neat and clean.

Hazardous Waste Storage Area

Main hazardous waste Storage Area – One 55-gallon drum (waste flammable liquid) and one 15-gallon drum (still bottoms) of hazardous waste were observed to be closed, labeled ‘hazardous waste’ and marked with an accumulation start date of less than 180 days.

Used Oil – One used oil tank (approximately 200 gallons) was observed to be properly labeled. The used oil storage area was very clean.

Universal Waste (Used Lamps containing mercury) – No universal waste was observed onsite.

Emergency Preparedness - The facility is equipped with a PA system (intercom), audible/pull fire alarms and staff carry two way radios and/or cell phones. The facility is equipped with fire extinguishers and fire suppression equipment throughout. Spill clean-up supplies were available in the storage area and at various locations onsite. Emergency equipment is routinely inspected and maintained.

RECORDS & DOCUMENT REVIEW

Manifests and Land Disposal Restriction (LDR) forms – Manifests & LDR records were reviewed for 2012- 2015. All records appeared to be complete and were extremely well organized. Caliber Collision utilized the following hazardous waste management vendors during the specified time frame:

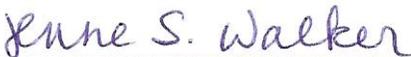
HW Transporter: Safety Kleen – KYD 053 348 108

HW TSD: Safety Kleen – TXR 000 081 205

9. CONCLUSION:

The cooperation provided by facility staff was greatly appreciated during the compliance evaluation inspection. Based on a review of manifests and hazardous waste generating operations, the facility routinely operates as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. **Because the facility is currently listed with NC DWM as a Small Quantity Generator (SQG), you may wish to re-notify as a CESQG.** A blank 8700-12 form was provided to the inspection participants via email following the inspection. Please complete and submit the 8700-12 if you should wish to re-notify. A summary of the regulations applicable to CESQGs of hazardous waste is attached for your reference.

The facility was found to be operating in compliance with the CESQG regulation requirements at the time of the inspection. If you have any questions about this report or maintaining compliance with the (RCRA) hazardous waste management regulations, please contact me at 919-707-8224 or by email at jenne.walker@ncdenr.gov.



Jenne S. Walker
Environmental Senior Specialist, NCDEQ

tSigned 4/29/2016

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 lading indicating that the hazardous waste has been properly shipped and treated or disposed.

Used Oil* and Universal Waste* Management Checklist

*Used Oil and Universal Waste Requirements may be applicable regardless of the status of a facility as a hazardous waste generator!

- **Used Oil Storage Areas:** As long as used oil is destined for recycling, it can be managed under the 40 CFR 279 Used Oil Management requirements. The basic requirements for used oil generators include:
 - Used oil must be stored in container and/tanks that are in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking.
 - The container or tank (or fill pipes used to transfer used oil into underground storage tanks) must be labeled with the words “Used Oil”. Please note that waste oil is not the same as used oil. Used oil is destined for recycling. Waste oil is destined for disposal or does not meet the definition of used oil.
 - Upon detection of a release of used oil to the environment, the following steps must be taken:
 - a) Stop the release;
 - b) Contain the released used oil;
 - c) Clean up and manage properly the released used oil and other materials; and
 - d) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.
- **Universal Waste Storage Areas:** Universal waste regulations, found at 40 CFR 273, apply to used lamps, batteries, mercury containing equipment and pesticides. If a universal waste handler accumulates less than 5000 kg of universal waste on site at any time, the general requirements include:
 - Universal waste must be stored in a way that prevents releases of any universal waste or component of universal waste.
 - The universal waste must be stored in containers that are kept closed, structurally sound, adequate to prevent breakage and compatible with the contents.
 - The containers must be labeled with the words “Universal Waste _____”, “Waste _____” or “Used _____”.
 - Universal waste may not be kept on site for more than one year. It is recommended that the containers be marked with an “accumulation start date” so the facility can track the amount of time the universal waste is on site.
 - The facility must inform all employees who handle or have the responsibility for managing universal waste about the proper handling and emergency procedure appropriate to the type(s) of universal waste handled at the facility.
 - The facility must respond to releases of universal waste immediately. The facility must make a waste determination on the material resulting from the release and if the material is a hazardous waste, the facility must manage the material by the applicable hazardous waste requirements.
 - A small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility or a foreign destination.