

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

Your Name: Andrew Martin

Facility ID Number: NCS000001121

Facility Name: Southern Metals Compant

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: MSRP

Date of Document: 11/25/2015

Author(s) of Document: Andrew Martin

Inspector ID #: NC115

Suborganization: Resident Inspector Program

County (if not on report):

**North Carolina Department of Environmental Quality
Division of Waste Management
Hazardous Waste Section
Mercury Switch Removal Program
Compliance Evaluation Checklist/Report**

Facility Name: Southern Metals Company Date of Inspection: 11/25/2015

Facility ID Number: NC000001121

Previous Inspection date(s): 11-12-2013, 12-21-2011

Facility Generator Status: NAG

County: Mecklenburg

Address: 2200 Donald Ross Road, Charlotte, NC 28266

Phone: 607-760-3776

Mailing Address (If Different): PO Box 668923

E-Mail Address: andy@southernmetalscompany.com

Owner/Contact: Andy Helbein

Type of Business: Scrap Iron & Non-Ferrous Metals Recycling

Number of Cars Dismantled Per Year? 12,000 +

Does The Facility Shred On-Site? Yes

Does The Facility Crush On-Site? No

**If YES Do They Own Their Own Crusher?* NA

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

Does The Facility OWN or OPERATE A Mobile Crusher? No

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)** No

Facility Able To Demonstrate Accumulation Time: **273.15(c)** No. Last shipment 12-4-2013

Number of Shipments of Switches: 5

Shipping Papers Maintained: Yes

Employees Trained In Mercury Handling & Emergency Procedures: **273.13(c)(2)(vi)** Yes

Mercury Switch Removal Log Maintained: Yes

Mercury Spill Kit On Site: **273.13(c)(2)(iii)** Yes



USED OIL MANAGEMENT

Does Facility Generate Used Oil: **279.22(a)** Yes
Stored In: Tank(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: Yes

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: Plastic Tote
Total amount of Spent/Waste Gasoline and/or Total Amount On-Site: 275 gallon
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: Cardboard container
Evidence of Weights on the Ground: No

INSPECTION HISTORY

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

DEFICIENCIES / CITATIONS:

- None

COMMENTS / RECOMMENDATIONS:

- Universal Waste-Mercury switches must not be stored onsite for more than one year (365 days) of the date in which the first switch and or mercury bullet is placed into the container. The facility must also be able to demonstrate the accumulation time. A container of mercury switches was observed without accumulation start date and the last indicated shipment to ELVS occurred on 12-4-2013. **Required per 40 CFR Part 273.15c. It is recommended that the facility date the containers once the first switch is added to the container and ensure that the switches are not kept onsite for more than one year.**

- The mercury switch container was not labeled appropriately. Universal waste mercury-containing equipment (i.e., each device), or a container in which the equipment is contained, must be labeled or marked clearly with any of the following phrases: "Universal Waste—Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment." **Required per 40 CFR 273.14(d)(1). It is recommended that the facility properly label all containers of mercury switches.**
- **It is a reminder that all containers used to collect or store Used Oil should be labeled as "Used Oil."**
- Lead Acid batteries are stored stacked on top of each other in a 55-gallon plastic trash receptacle with a lid. It is recommended that the facility cover the battery terminals to minimize the risk of arcing and fires.
- It is recommended that the facility label the tote used to collect spent/waste gasoline.
- 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.
- Additional information, regarding shipment of switches and other program guidance documents can be found at <http://elvsolutions.org> under the educational materials section and at: <http://portal.ncdenr.org/web/wm/hw/programs/mercuryswitch>
- Used aerosol cans were observed during the inspection. The facility indicated that the spent aerosol containers are sent to the onsite shedder for recycling. 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.

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

Andrew Martin 11/25/2015

NC HWS-INSPECTOR / DATE

By E-Mail

FACILITY CONTACT / DATE

