

Hazardous Waste Section  
File Room Document Transmittal Sheet

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Your Name: Andrew Martin  
EPA ID: NCS000002036  
Facility Name: LKQ Pick Your Part  
Document Group: Inspection/Investigation (I)  
Document Type: Focused Compliance Inspection (FCI)  
Description: MSRP Inspection  
Date of Doc: 11/4/2015  
Author of Doc: Andrew Martin

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**File Room Use Only**

NCS000002036

Date Recieved by File Room:

Month	Day	Year

Date Scanned:

Scanner's Initials:

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

Facility Name: LKQ Pick Your Part Date of Inspection: 11/4/2015

Facility ID Number: NC000002036

Previous Inspection date(s): 11-18-2013

Facility Generator Status: NAG

County: Mecklenburg

Address: 3900 Chesapeake Drive, Charlotte, NC 28216

Phone: 607-760-3776

Mailing Address (If Different): \_\_\_\_\_

E-Mail Address: Jedoebler@LKQcorp.com

Owner/Contact: Jeff Doebler

Type of Business: Auto Salvage & Used Parts

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Number of Cars Dismantled Per Year? 1,000 +

Does The Facility Shred On-Site? No

Does The Facility Crush On-Site? Yes

*\*If YES Do They Own Their Own Crusher?* Yes

*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. 7 Containers of switches onsite.

Switches In Closed Containers: **273.13(c)(1)** No

Containers Properly Labeled: **273.14(d)(1)** No

Facility Able To Demonstrate Accumulation Time: **273.15(c)** No

Number of Shipments of Switches: 3

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)** Yes  
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: Tank(s)  
Total amount of Spent/Waste Gasoline and/or Total Amount On-Site: 1,000 gallons  
Evidence of Spent/Waste Gasoline Release: No

### LEAD WEIGHT MANAGEMENT

Does the Facility Generate Lead Tire Weights: No  
Does the Facility Manage Weights for Recycling: No  
\*If Yes, How are weights stored: NA  
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:

- It is a reminder that 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 be able to demonstrate the accumulation time. Several containers of switches were observed without accumulation start dates. **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.**



- Some of the mercury switch container were not labeled appropriately. The 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.**
- During the inspection a container of mercury switches was observed open. Mercury switches must be kept in closed containers unless adding or removing switches. **Required per 40 CFR 273.13(c)(1). It is recommended that the facility ensure that containers are closed.**
- 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>

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

*Andrew Martin* 11/4/2015

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NC HWS-INSPECTOR / DATE

**By E-Mail**

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FACILITY CONTACT / DATE