

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Andrew Martin
EPA ID: NCD980842132
Facility Name: Ecoflo
Document Group: Inspection/Investigation (I)
Document Type: Focused Compliance Inspection (FCI)
Description: TSDF Inspection at Ecoflo. LFNOV to be issued for violations found during inspection. Docket # ~~2015-009~~ 2016-009
Date of Doc: 11/5/2015
Author of Doc: Andrew Martin

File Room Use Only

NCD980842132

Date Recieved by File Room:

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Date Scanned:

COMMERCIAL FACILITY REPORT
Resident Inspector Program
Waste Management Division
Department of Environmental Quality

2016-009

DOCKET #: ~~2015-009~~

INSPECTION AND EVALUATION

EPA ID #: NCD980842132		FACILITY NAME: Ecoflo	
ADDRESS: 2750 Patterson Street		CITY: Greensboro, NC	
NEW <input checked="" type="checkbox"/>	UPDATE <input type="checkbox"/>	DATE(S) OF INSPECTION: 11/05/2015	STAFF ID #: 115

EVALUATION TYPE: <u>3, 6, 7, 8, 9</u>	1 = Compliance Evaluation (CEI for HWS) 2 = Sampling / Monitoring. 3 = Record Review (Logs, Annual Report) 4 = Air / Water Permit Requirements 5 = Reinspection (Compliance Schedule). 6 = Cont. Plan / Prev & Prep (Safety/OSHA)	7 = Part B Permit 8 = Manifests / LDRs 9 = General 10 = Waste Analysis Plan 11 = Complaint Investigation 12 = BIF 80 = Informal Meeting
JOINT / SUB <input type="checkbox"/>		
OFF SHIFT <input type="checkbox"/>		
DURATION (Hrs) <u>4.5</u>		

REINSPECTION ONLY: Date of Initial Evaluation:

Original Docket #:

CLASS OF VIOLATION / DEFICIENCY

Class	O2/H2O	Safety/CP	FIN	Part B	Comp Sch	Man	LB	OT	W Mgt	BIF
SNC	O	O				O				
SV	O	O		X		O			X	

SNC = Significant Noncomplier

SV = Secondary Violation

Acceptable Codes

RS	XS	XS	XS	XS	XS	XS	XS	XS	XS	XS
ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO
H	HR	HI*	H	H	H	H	H	H	H	H

Key:

X = Violation(s)

O = No Violation

R = Referral to DEM or OSHA

H = HPV Violations Present

Z = Pending / Deficiency

S = Same Violation (repeated)

I = No Insurance Only

* = SNC Only

ENFORCEMENT ACTIONS:

Area of Violation(s) = CP, PP, FI, PB, CS, MA, LB, OT, WM, BIF

CLASS	AREA OF VIOLATION	TYPE CODE	DATE ACTION TAKEN	COMPLIANCE DATES		PENALTY ASSES. COLL.	RESP AG
				SCHED.	ACTUAL		
SV	PB, WM	03	11-05-2015		1/15/2016		

Codes for Types of Enforcement Actions:

01 = Warning Letter

02 = Ticket NOV

03 = Draft NOV

04 = Admin. Complaint

05 = Final Admin. Order

10 = Informal

11 = Filed Civil Action

12 = Filed Criminal Action

13 = Civil Referral to AG

90 = Hearing

Comments / Recommendations: _____

North Carolina Department of Environmental Quality
Division of Waste Management

RESIDENT INSPECTOR REPORT

1) Facility Information

Ecoflo
2750 Patterson Street
Greensboro, NC

EPA ID# NCD980842132

Permit Status: RCRA
 Air
 Water

2) Facility Contact

Ray Dudley

Arrived: 12:00 pm

Departed: 4:30 pm

3) Date of Inspection / Inspector

11/5/2015
Andrew Martin

Shift: 1st
 2nd
 3rd
Wkend

4) Facility Description Changes

None

5) Areas of Concentration

Part "B" Permit General	Waste Compatibility	Labeling	Inspection Documents
Physical Inspection	Waste Management	Container Management	HHW Area
10-day Area	Staging Areas	Safety	

2016-009

6) Site DeficienciesDocket #: ~~2015-009~~

- A. Hazardous Waste Management Permit No. NCD980842132-R3, Condition Part III, adopted by reference at 15A NCAC 13A.** Pursuant to this permit condition, wastes listed in Part II.A. of this permit are sorted according to hazard class and stored in compatible containers with compatible materials in diked areas until decanted for on-site treatment, processed in the neutralization unit, bulked in the roll-off container if solid, or until a large shipment can be made to another off-site recovery, treatment, or disposal facility.

Ecoflo, Inc. is in violation of this Permit condition in that during the inspection, three hazardous waste containers were found being stored in areas of the facility that are not permitted for the storage of hazardous waste. Specifically, there was one container of flammable hazardous waste (approximately 15-gallons in size) and one container of corrosive hazardous waste (approximately 15-gallons in size) found staged along with universal waste containers in the rear portion of the West Staging Area.. The container of flammable waste was labeled with D001/F003/F005 EPA waste codes (Ecoflo Profile #2FEI-001) and the container of corrosive waste was labeled with D002/D007 EPA waste codes (Ecoflo Profile #2FEI-014). Labels on both of the containers listed the Hazardous Waste Manifest Tracking Number 000689079WAS and were marked with an accumulation start date of October 10, 2015. In addition, there was one 55-gallon container of flammable hazardous waste being stored on a concrete driveway, located outside of the facility in an area used to accumulate empty containers. The concrete driveway area is not equipped with a dike system or any other type of secondary containment. The container was labeled with D001/F003/F005 EPA waste codes (Ecoflo Profile #2FSG-002) and the Hazardous Waste Manifest Tracking Number 000688873WAS. The container was marked with an accumulation start date of October 27, 2015.

B. Hazardous Waste Management Permit No. NCD980842132-R3 Condition Part III.5 (Compatibles Storage Area), adopted by reference at 15A NCAC 13A. Pursuant to this permit condition, wastes that exhibit toxicity characteristic as described in 40 CFR 261.24 as adopted in 15A NCAC 13A .0106 or waste having the hazard code T, indicating toxicity, may be stored in the Compatibles Storage Area. Two areas bisected by a wall are used to store a variety of containers with materials which are compatible with one another.

Area Description:

Areas: 41.17 feet x 40.00 feet and 83.67 feet x 32.42 feet

Curb: 7" minimum

Total Container Volume: (34,856 gallons) maximum combined volume (633-55 gallon drums)

1. Ecoflo, Inc. is in violation of this Permit condition in that at the time of inspection a review of Ecoflo's Daily Storage Vault Count inspection form, dated November 5, 2015, listed that there was 35,640 gallons of hazardous waste being stored within the Compatibles Storage Area. Based on the volume of waste recorded on the daily inspection Ecoflo has exceeded the maximum storage capacity by 784-gallons. The maximum storage capacity was exceeded on 11-5-2015.
2. Ecoflo, Inc. is in violation of this permit condition in that at the time of the inspection there was one container of flammable hazardous waste being stored in the Compatibles Storage Area, which is not an area permitted for storage of such waste. The container was labeled with D001 EPA waste code (Ecoflo Profile #2FQS-002) and Manifest# 000079409WAS. The container was marked with an accumulation start date of August 25, 2015. Ecoflo, Inc. has failed to store this container of hazardous waste within the Flammable Materials Storage Area as specified within the facility's permit.

C. Hazardous Waste Permit No. NCD980842132-R3, Condition Part III.E, adopted by reference at 15A NCAC 13A. Pursuant to this Permit condition, at a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35 as adopted in 15A NCAC 13A .0109. A minimum aisle space of two feet (24 inches) shall be maintained at all times except as described in Sections D-1(a)(4) and F-3(b) of the Attachment. Less than 24 inches of aisle space is allowed only where specified in the Floor Plans in Figure D-1 of the Attachment. In these locations, stacking of storage containers on one of the two rows of pallets shall not exceed 60 inches in height except in the case of stacking totes or cubic yard boxes. Markings and labels on containers must be visible for inspection and adequate room for emergency response in these areas must be maintained.

1. Ecoflo, Inc. is in violation of this permit condition in that pallets, supporting various sized hazardous waste containers, observed within the Toxic Material Storage Area were arranged in rows exceeding one pallet width and with an aisle spacing of less than 24 inches. Specifically, there were three rows of palletized hazardous waste containers and one row of palletized empty containers observed in a portion of the storage area, located next to the entrance ramp leading into the area, that were staged up against one another without any aisle spacing. The manner in which the pallets were staged within these rows prohibited easy access and inspection of several hazardous waste containers and restricted access to an emergency exit, located behind the rows. Although the facility's Permit allows for a pallet spacing variance for specific rows/portions within the Toxic Material Storage Area, the rows in question were not associated with the rows specified for a variance.
2. **40 CFR 264.35, referenced at 15A NCAC 13A .0109,** states that the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless it can be demonstrated to the Regional Administrator that aisle space is not needed for any of these purposes. [Comment: Part 270 of this chapter requires that an owner or operator who wishes to make the demonstration referred to above must do so with Part B of the permit application.]

Ecoflo, Inc. is in violation of this regulation in that at the time of inspection the entrance way to the Alkaline Reactive Material Storage Area was obstructed by stacks of empty drums, containers of Household Hazardous Waste and other debris. Access to this area could only be achieved by stepping on and over pallets. Ecoflo, Inc. has failed to maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to the Alkaline Reactive Material Storage Area in an emergency.

- D. Hazardous Waste Management Permit No. NCD980842132-R3, Condition Part III.G, adopted by reference at 15A NCAC 13A.** Pursuant to this permit condition, the Permittee shall not locate containers holding ignitable or reactive waste within 50 feet of the facility's property line.

Ecoflo, Inc. is in violation of this permit condition in that at the time of the inspection there were two containers of flammable hazardous waste being stored in areas that are within 50-feet of the facility's property line. One of the containers (approximately 15-gallons in size) was labeled with D001/F003/F005 EPA waste codes (Profile #2FEI-001), and was staged with containers of universal waste near the rear wall of the West Staging Area. The second container (55-gallons in size) was labeled with D001/F003/F005 EPA waste codes (Ecoflo Profile #2FSG-002), and was staged outside of the facility; on a concrete pad within an area used to accumulate empty containers. Both of the hazardous waste containers were being stored in non-permitted areas that are within 50-feet of the facility's property line.

- E. Hazardous Waste Management Permit No. NCD980842132-R3, Condition Part III.H.3, adopted by reference at 15A NCAC 13A.** Pursuant to this permit condition, the Permittee shall not store a container of hazardous waste that is incompatible with any waste or material stored nearby in other containers, piles, open tanks or surface impoundments unless the container is separated from the other materials by a dike, berm, wall, or other device

Ecoflo, inc. is in violation of this permit condition in that there were two containers of waste oxidizing materials discovered within the Flammable Materials Storage Area. The waste oxidizers are potentially incompatible with waste flammable liquids/materials that were also being stored within the Flammable Materials Storage Area. The labels observed on the containers of waste oxidizing materials described the waste as:

- One 5 gallon plastic bucket labeled Waste Oxidizing Liquid, Corrosive, N.O.S. (Perchloric Acid, Hydrogen Peroxide) 5.1(8) D001, D002. Container # 2071565, Ecoflo Profile #2FKQ-LAB. Manifest Document #00688792WAS
- One 5 gallon plastic bucket labeled Waste Corrosive Liquid (Nitric Acid, Silver Nitrate) 8 (5.1) D001, D002, D011. Container # 2071621, Profile # 2FKQ-LAB. Manifest Document #00688792WAS.

Note: A copy of the daily vault count was obtained during the inspection. Photographs of the above violations are attached.

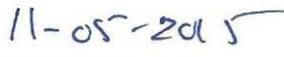
7) Recommendations/Comments

- The facility was observed to have poor housekeeping in multiple area. Areas were cluttered and difficult to access. It is recommended that the facility improve housekeeping throughout the facility. Especially in areas that pertain to access/egress to hazardous waste storage areas or emergency exits.
- A leaking cubic Yard bag of hazardous waste filter cake was observed in the Compatibles storage area. Black liquid was observed on the containers underneath it. It is recommended that the facility contain institute measures to stop the leak from occurring.

- An area of broken concrete was observed at the entrance of the flammables storage vault. The facility should immediately repair and recoat the damaged concrete per the specifications listed in the facility's permit.

8) *Followup Actions From Previous Inspections*

None

	
<hr/>	<hr/>
<i>Facility Representative</i>	<i>Date</i>
	11-05-2015
<hr/>	<hr/>
<i>Andrew Martin, QEP- Resident Inspector</i>	<i>Date</i>

**EcoFlo Photographs
NCD980842132**

Taken during inspections conducted on 11/05/2015



Figure 1: The photograph above depicts the Universal Waste Storage Area located in the rear portion of the West Staging Area. In this area two containers of improperly stored hazardous waste were found. Note the poor housekeeping in this area.



Figure 2: The photograph above depicts an improperly stored flammable hazardous waste container located with the universal waste in the West Staging Area. This area is within 50 feet of the property boundary.

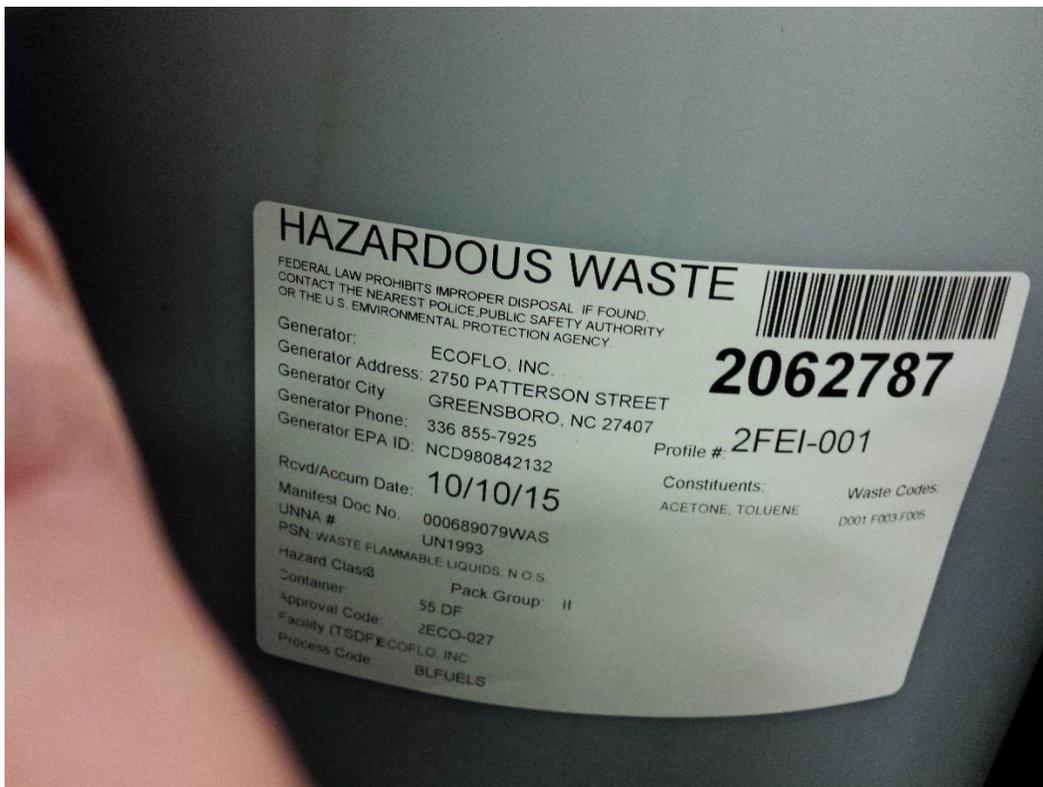


Figure 3: The photograph is a close up of the label for the improperly stored flammable hazardous waste container located with the universal waste in the West Staging Area. Note the container accumulation date.



Figure 4: The photograph above depicts a improperly stored corrosive hazardous waste container located with the universal waste in the West Staging Area.

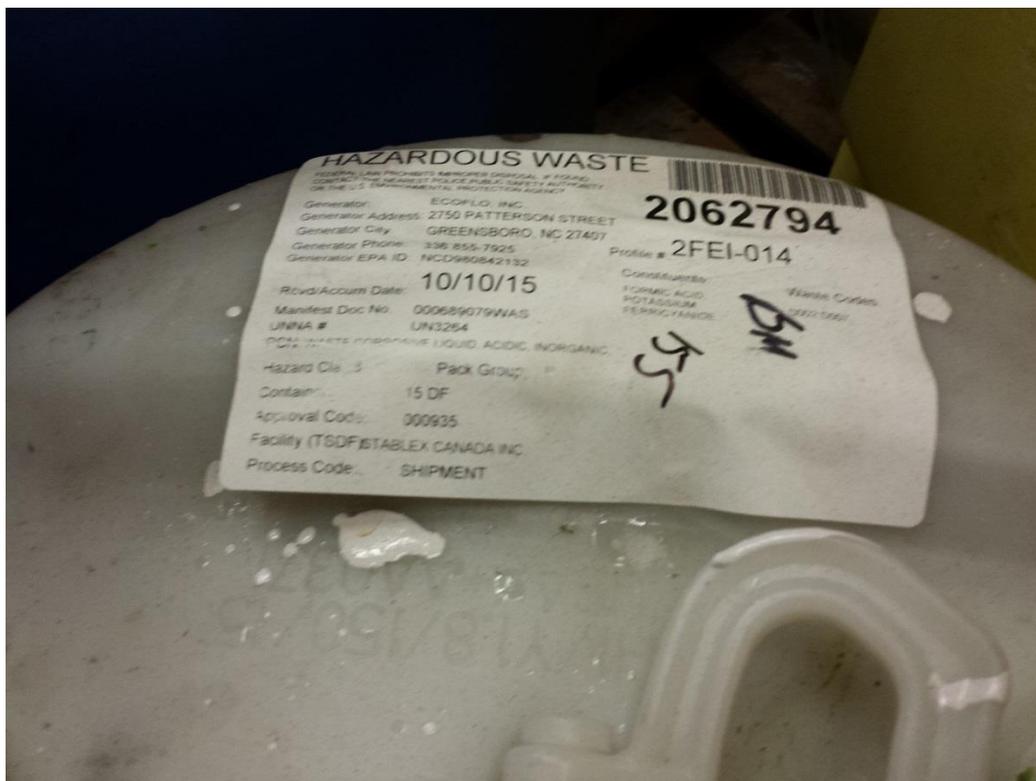


Figure 5: The photograph above is a close up of the label for the improperly stored corrosive hazardous waste container located with the universal waste in the West Staging Area. Note the container accumulation date.



Figure 6: The photograph above depicts an improperly stored flammable hazardous waste container staged on the exterior concrete drive amongst empty containers. This area is within 50 feet of the property boundary. The amount of liquid within the container is clearly visible

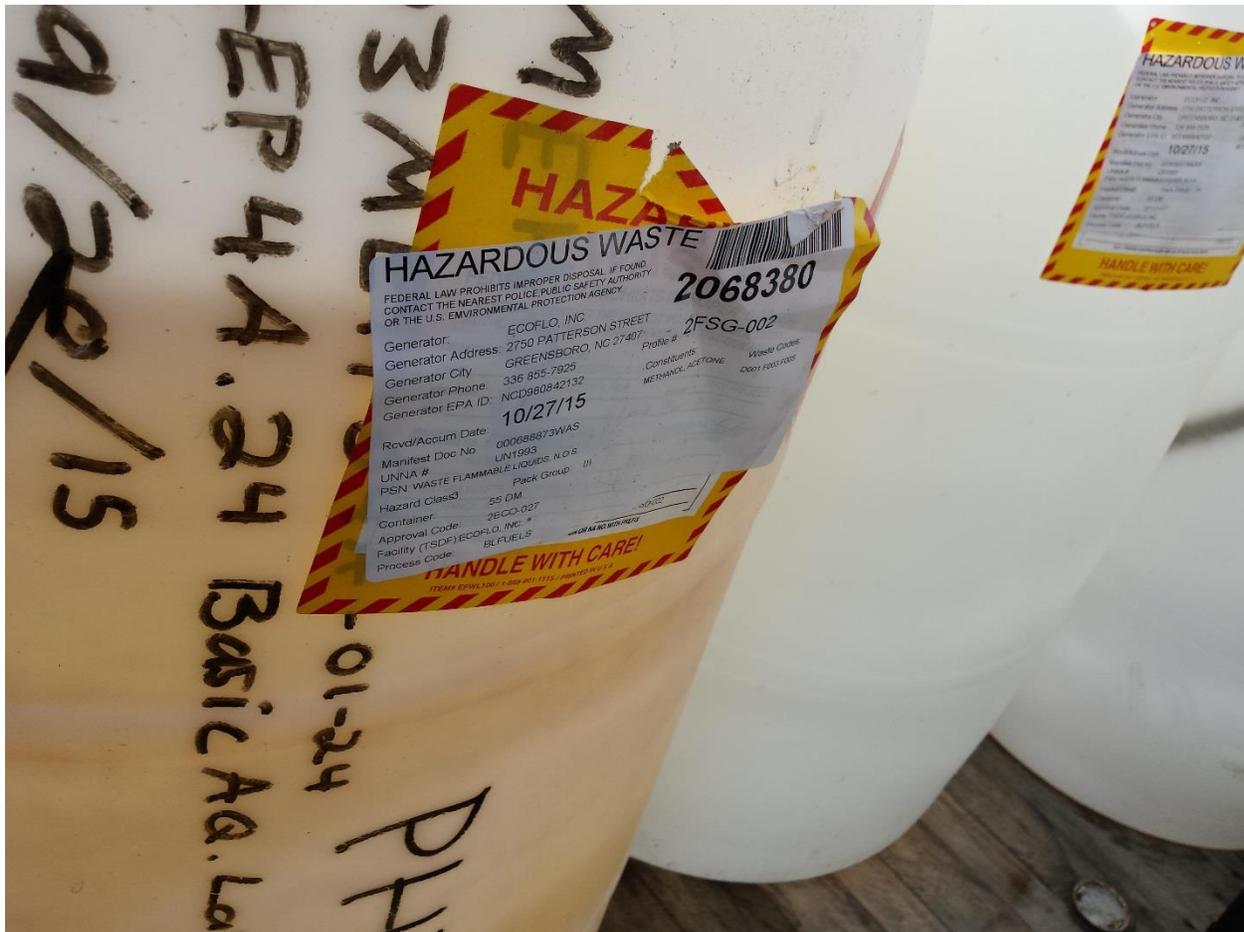


Figure 7: The photograph above is a close up of the label of the improperly stored flammable hazardous waste container staged on the exterior concrete drive amongst empty containers. Note the accumulation start date and liquid level.



Figure 8: The photograph above depicts the label on the flammable hazardous waste container that was improperly stored in the compatibles storage area. Note the accumulation start date.



Figure 9: The photograph above depicts the improper aisle spacing within the Toxic Material Storage Area. Note the emergency exit located in the rear.



Figure 10: The photograph above depicts containers and debris obstructing the entrance way to the Alkaline Reactive Material Storage. The doorway the storage area is to the left of the liquid nitrogen tank below the light fixture.



Figure 11: The photograph above depicts a closer view of the containers and debris obstructing the entrance way to the Alkaline Reactive Material Storage.

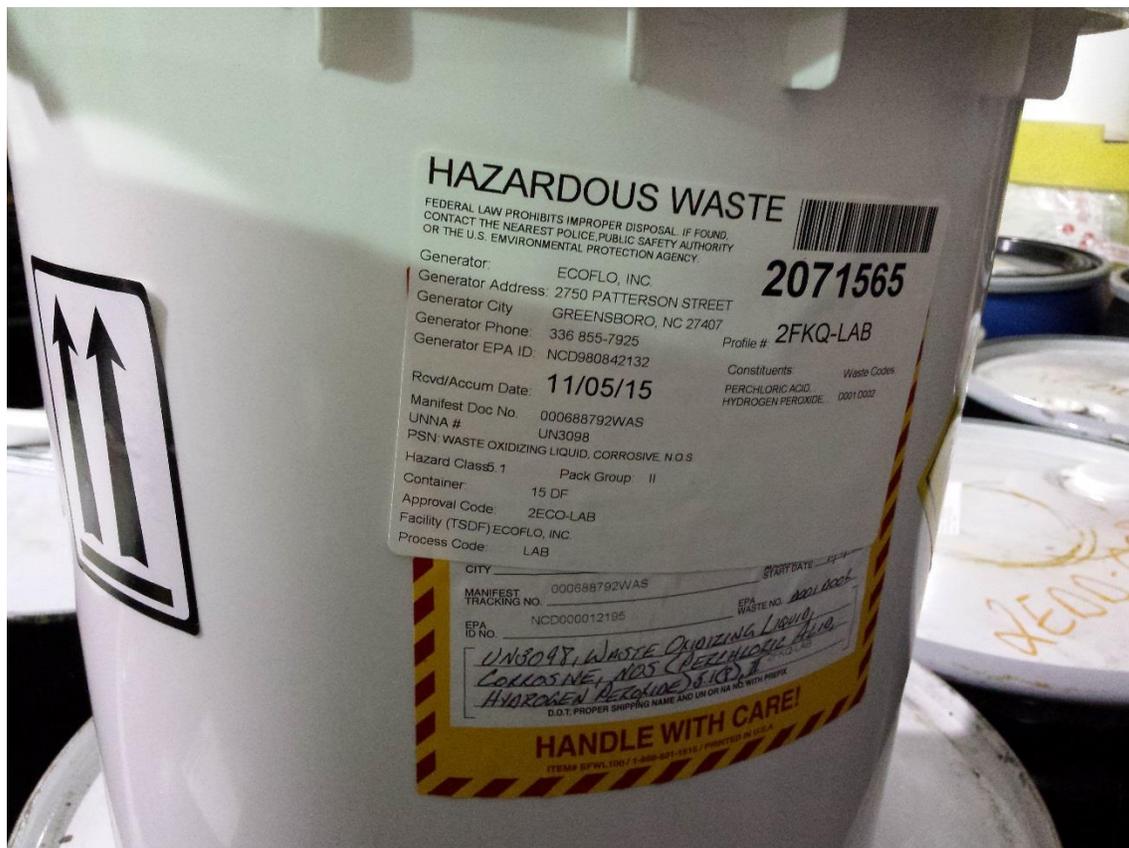


Figure 12: The photograph above depicts the label of the incompatible oxidizer hazardous waste container that was staged in the Flammable Materials Storage Area.



Figure 13: The photograph above depicts the label of the incompatible corrosive hazardous waste container that was staged in the Flammable Materials Storage Area. The container contained Nitric Acid and Silver Nitrate which are incompatible with flammable liquids. Note the flammable liquid placarding in the background.



Figure 14: The photograph above depicts the marking used to indicate the 50 foot property line buffer. The marker is a small piece of grey duct tape located on the back wall that lines up with the left edge of the ramp. The picture was taken from the West Staging Area. Note that to the left is the universal waste storage area and is within the 50 foot buffer.

DAILY STORAGE VAULT COUNT (Cont)

Date: 11/5/15

Vault: NHTC (Capacity: 633)

1	4	1.55	1.00	0.55	0.36	0.27	0.18	0.09
YD3 / TP	YD3 / TP	85	55	30	20	15	10	5
3	61	5	186	307	1	73	23	169
3	61	5	186	307	1	73	23	169
3.00	244.00	7.73	186.00	167.45	0.36	19.91	4.18	15.36

Total NHTC Vault: 648.00

Gallons 35640