

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.
Date of Doc: 12/18/2015
Author of Doc: Andrew Martin

File Room Use Only

Date Recieved by File Room:

Date Scanned:

Month	Day	Year

NCD980842132

Scanner's Initials:

COMMERCIAL FACILITY REPORT

Resident Inspector Program

Waste Management Division
Department of Environmental Quality

DOCKET #:

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: 12/18/2016	
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>2.5</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		O			O	
SV	O	O		O		O			O	

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		

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: 1:30 pm

Departed: 4:00 pm

3) Date of Inspection / Inspector

12/18/15
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	
10-day Area	Staging Areas	Safety	

6) Site Deficiencies

None

Docket #: N/A

7) Recommendations/Comments

- A container of UN 2985 Waste Chlorosilanes, Flammable Corrosive, n.o.s (Hexane, Trichlorosilane), 3, 8, PGII (#2046946) located in the flammable storage vault is incompatible with the type of container they are stored in. The material is currently stored within a 1H1 plastic container. The container is bulging and beginning to corrode. It is highly recommended that the facility consult 49 CFR Part 173.206 to ensure that the material is properly managed in the appropriate containers. Please note that Part III, B of the facility's permit requires that the Permittee comply with 40 CFR 264.172 as adopted in 15A NCAC 13A .0109 and ensure that the ability of the container to contain the waste is not impaired. FCIs conducted at this facility on 10-2-2014, 12-29-2014, and 2-10-2015 also found containers of chlorosilanes stored in incompatible containers.
- The rear gate of the facility is closed and locked with a chain; however a large gap exists between the gate and facility that could allow a person to squeeze through. It is recommended that the facility repair the gear gate to ensure that the facility is secure.

8) **Corrections/Follow-up Since Last Inspection**

- 11-5-2015 FCI: Significant improvements have been made to housekeeping around the facility. The outdoor household hazard waste areas could still use some improvements. Numerous spills and leaks of paint was observed. Incompatible wastes was not observed during this inspection and all wastes were located within their respective storage areas. Flammable hazardous waste were located outside of the 50 foot buffer.

<u>Ray Dudley</u>	<u>12/18/15</u>
Facility Representative	Date
<u>Andrew Martin</u>	<u>12-18-15</u>
Andrew Martin, QEP Resident Inspector	Date