

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

Your Name: J. Sean Morris

Facility ID Number: NCD061263315

Facility Name: Nexeo Solutions, LLC

Document Group: Inspection/Investigation (I) **Document Type:** I - Focused Compliance Inspection (FCI)

Description for File (for CARA): Commercial Facility Inspection. TNOV Issued.

Date of Document: 11/24/2015

Author(s) of Document: J. Sean Morris

Inspector ID #: NC046

Suborganization: Resident Inspector Program

Comments for RCRAInfo: Commercial Facility Inspection. TNOV Issued.

County (if not on report): Mecklenburg

For Violations:

Enforcement Date: [Click here to enter a date.](#)

Docket Number:

Enforcement Type:

How many violations were there?

For IANOV or CO: The facility is

Outcome Measures for CSE for IANOV or CO:

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

Violation #1:

Date Determined: 11/24/2015

Scheduled Return to Compliance: 12/18/2015

Actual Return to Compliance: [Click here to enter a date.](#)

Regulation Description: Hazardous Waste Management Permit ID# NCD061263315-R2, Permit Condition, Part III H.3, adopted by reference at 15A NCAC 13A

Comment: Storage of Incompatible Wastes

For CSE, Corrections to Violations were:

COMMERCIAL FACILITY REPORT
Resident Inspector Program
 Division of Waste Management
 Department of Environment and Natural Resources
 North Carolina

DOCKET #: 2016-012

INSPECTION AND EVALUATION

EPA ID#: NCD061263315		FACILITY NAME: NEXEO SOLUTIONS, LLC	
ADDRESS: 3930 Glenwood Drive		CITY: Charlotte, NC	
NEW <input checked="" type="checkbox"/>	UPDATE <input type="checkbox"/>	DATE OF INSPECTION: 11/24/15	STAFF ID# 46

EVALUATION TYPE: 3,6,7,8,9,10	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 / Prep & Prev (Safety/OSHA)	7 - Part B Permit 8 - Manifests / LDR 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) 2.35 HRS		

REINSPECTION ONLY - Date of Initial Evaluation:

Original Docket #:

CLASS OF VIOLATION / DEFICIENCY

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

Acceptable Codes

RSZO H	XSZOHR	XSZO HI*	XSZO H	XSZO H	XSZO H	XSZ OH	XSZH O	XSZO H	XSZOH
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KEY: SNC = Significant Noncomplier
SV = Secondary Violation

X - Violation(s)
O - No Violation
R - Referral to DEM or OSHA
H - HPV Violations Present

Z - Pending
S - Same Violation (Repeated)
I - No Insurance Only
* - Class I 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	Part B	02	11/24/15	12/18 /15 -			

Codes for Types of Enforcement Actions:

01 - Warning Letter	10 - Informal
02 - Ticket NOV	11 - Filed Civil Action
03 - Draft NOV	12 - Filed Criminal Action
04 - Admin, Complaint	13 - Civil Referral to AG
05 - Final Admin. Order	90 - Hearing

Comments / Recommendations: TNOV, Docket #2016-012



NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH

RESIDENT INSPECTOR REPORT

1) **Facility Information:**

Nexeo Solutions, LLC
3930 Glenwood Avenue
Charlotte, NC 28208

EPA ID#: NCD061263315

Permit Status: RCRA
 Air
 Water

2) **Facility Contact:**

Mr. Tim Nightwine, Nexeo- Plant Manager
704.392.2121

Arrived: 12:10pm

Departed: 2:45 pm

3) **Date of Inspection:**

November 24, 2015

Shift: 1st
 2nd
 3rd
 Wkend

4) **Facility Participants:**

Mr. Tim Nightwine, Nexeo Solutions, LLC - Plant Manager
Mr. Fred Quinton, Nexeo Solutions, LLC

5) **Inspector / Date of Report:**

Mr. Sean Morris, HWS-Environmental Senior Specialist / December 4, 2015

6) **Facility Description Changes:**

None

7) **Areas of Concentration:**

Physical Inspection	Container Management	Waste Compatibility	Manifests/LDRs
Part "B" Permit	Emergency Equipment	Waste Profiles	

8) **Follow-Up Actions:**

N/A

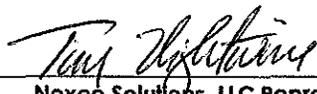
9) **Deficiencies:**

Docket #: 2016-012

A. NC Hazardous Waste Management Permit ID# NCD061263315-R2, Permit Condition, Part III H.3, adopted by reference at 15A NCAC 13A and Nexeo Solutions, LLC Part B Application, Section D-1d. Pursuant to Permit Condition, Part III H.3: Special Requirements for Incompatible Waste, 1. The Permittee shall not place incompatible wastes in the same container. 2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. 3. 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. Additionally, pursuant to Nexeo Solutions, LLC Part B Application, Section D-1d, incompatible wastes will not be placed in the same container. Only wastes that are compatible with each other will be stored within a specific bay in the curbed storage area. These hazardous wastes may contain free liquids; therefore, the storage area is designed for containers with free liquids.

Nexeo Solutions, LLC has failed to comply with this permit condition in that containers of incompatible hazardous waste was observed being stored within the same permitted hazardous waste storage area and there was not any type of device present to separate the waste containers. Specifically, there was one metal 55-gallon container of D002 acidic hazardous waste (Nexeo Profile #80-9684), DOT Shipping Name: Waste Aluminum Chloride, Solution, being stored in Area 1 - Bay #4 at the time of the inspection. Bay #4 was also being used to store multiple containers of hazardous waste liquids having a high pH value, such as waste sodium hydroxide & potassium hydroxide solutions. The profile for the waste aluminum chloride solution listed a pH value of "<1" and therefore would not be compatible with the containers of caustic wastes also being stored within Bay #4. Nexeo Solutions, LLC 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.

**NOTE: Ticket Notice of Violation (TNOV), Docket #2016-012, will be issued along with this report.*



Nexeo Solutions, LLC Representative / Date

J. Sean
Morris

Digitally signed by J. Sean Morris
DN: cn=J. Sean Morris, o=NC DENR,
ou=HWS-Compliance Branch,
email=sean.morris@ncdenr.gov,
c=US
Date: 2015.12.04 10:20:22 -05'00'

J. Sean Morris, HWS-Environmental Senior Specialist / Date

cc:
Raleigh Office
Nexeo Solutions, LLC
RI Cabinet Onsite Files