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

Your Name: Bobby Nelms
Facility ID Number: NCD050409150
Facility Name: Global Nuclear Fuel – Americas
Document Group: General (G)
Document Type: G - Correspondence (C)
Description for File: PCB Manifest Exception Report
Date of Document: 2/8/2016
Author(s) of Document: **Shawn O'Connor**

Inspector ID #: N/A **Suborganization: N/A**
Comments for RCRAInfo: For CARA entry only

Global Nuclear Fuel
A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel – Americas, LLC
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Shawn.oconnor@gnf.com

February 8, 2016

Ms. Heather McTeer Toney
Regional Administrator
US EPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

NC DEQ
Hazardous Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646

ATTN: Robert Nelms

RECEIVED
FEB 2016
Hazardous
Waste Section

Subject: PCB Manifest Exception Report

Dear Administrator McTeer Toney:

This document contains the Exception Report for manifested PCB shipment 000718386WAS. Note that the signed manifest for this shipment was received after the 45 day limit for exception reporting.

According to 40 CFR 761.215(a)(2), an Exception Report is required for any PCB shipment for which the signed manifest is not returned within 45 days. This Exception Report must be submitted no more than 45 days from the date on which the generator should have received the manifest. In addition, the Exception Report must contain a legible copy of the manifest and a cover letter signed by the generator explaining the efforts taken to locate the shipment and the results of those efforts.

Exception Report:

On 11/19/2015, a small quantity (16 kg) of fluorescent lamp ballasts lacking "No PCB" labels was shipped for disposal on manifest 000718386WAS. As of 1/3/2016 (45 days), GNF-A had not received the signed manifest. This event triggered the need for submittal of this Exception Report on or before 2/17/2016.

Efforts to Locate the Shipment:

- After 35 days (12/24/15), the signed manifest had not been received.

- On 12/28/2015, the first business day after 12/24, GNF-A sent an e-mail to Terrell Carr, the Heritage Environmental account coordinator, inquiring about this manifest.
- On 12/30/2015, GNF-A again sent an e-mail inquiry to Heritage about this manifest. Heritage responded on the same day indicating the shipment was in transit within the Veolia 10-day network. Heritage promised to continue to monitor the status of the shipment.
- On 1/3/2016, the 45th day after the shipment, GNF-A did not have the returned manifest thus triggering the requirement to submit an Exception Report within 45 days (by 2/17/2016).
- On 1/5/2016, Heritage indicated that they were still tracking the shipment, but that it had not yet reached its final destination.
- The shipment was received on 1/11/2016 and the returned manifest was received on 1/12/2016.

Copy of the Manifest:

A copy of the signed, returned manifest is attached.

If you have any questions or need additional information, please contact me at 910-819-5869 or via e-mail at shawn.oconnor@gnf.com

Sincerely,

2/8/16

Shawn O'Connor
Environmental Specialist
Global Nuclear Fuel - Americas

Attachments: Signed / Returned Manifest 000718386WAS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
NC0050409150	1	(800)326-1221	000718384WAS

5. Generator's Name and Mailing Address
GLOBAL NUCLEAR FUEL-AMERICA, LLC [illegible] A
3901 CASTLE HAYNE ROAD
WILMINGTON, NC 28402
Generator's Phone: (910)819-0500

Generator's Site Address (if different than mailing address)
GLOBAL NUCLEAR FUEL-AMERICAS, LLC
3901 CASTLE HAYNE ROAD
WILMINGTON, NC 28402
GEN: 55611

6. Transporter 1 Company Name: HERITAGE TRANSPORT, LLC — U.S. EPA ID Number: IND058484114

7. Transporter 2 Company Name: [illegible] — U.S. EPA ID Number: NTD 050621369

8. Designated Facility Name and Site Address
VEOLIA ES TECHNICAL SOLUTIONS [illegible]
5736 W JEFFERSON ST
PHOENIX, AZ 85043-3633
Facility's Phone: (602)233-2955
U.S. EPA ID Number: AZ0000337360

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PGII, (1 LB)	1	DF	16	K	
	2.					
	3.					
	4.					

RECEIVED
POSTED

14. Special Handling Instructions and Additional Information
CRG# 171 1.736417_T#8491716
SO# 1421389 OSD 11-10-15 FR1 HERITAGE [547294837]

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Sarah Southerland — Signature: Sarah Southerland — Month 11 Day 19 Year 15

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JAMES AUSMUS — Signature: [signature] — Month 11 Day 19 Year 15
Transporter 2 Printed/Typed Name: [illegible] — Signature: [signature] — Month 12 Day 23 Year 15

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: PAUL E OSBORNE — Signature: [signature] — Month 01 Day 11 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR