

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

**Your Name:** Bobby Nelms

**Facility ID Number:** NCD986230126

**Facility Name:** Cumberland County School Maintenance

**Document Group:** General (G)

**Document Type:** G - Compliance Assistance Visit (CAV)

**File Description/Comments:** Compliance Assistance

**Date of Document:** 1/11/2016

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**Inspector ID #:** NC036

**Suborganization:** Eastern Region

**County (if not on report):** Cumberland

**STATE OF NORTH CAROLINA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION**

**COMPLIANCE ASSISTANCE VISIT (CAV) REPORT**

**1. FACILITY INFORMATION:**

Name of Facility: Cumberland County School Maintenance  
EPA ID Number: NCD986230126  
Type of Facility: Small Quantity Generator  
Facility Location: 1114 Gillespie Street Fayetteville, NC 28306  
Cumberland County  
  
Telephone Number: 910-829-4497

**2. FACILITY CONTACT:** Mike Royal – Environmental Compliance Officer  
Email: [michaelroyal@ccs.k12.nc.us](mailto:michaelroyal@ccs.k12.nc.us)

**3. INSPECTION PARTICIPANTS:** Mike Royal – Environmental Compliance Officer  
Al Miller - Executive Director Transportation  
Email: [amiller@ccs.k12.nc.us](mailto:amiller@ccs.k12.nc.us)  
Bobby Nelms - NCDEQ

**4. DATE OF INSPECTION:** January 11, 2016

**5. PURPOSE OF INSPECTION:** Announced audit to determine compliance with the regulations described at 40 CFR 262, 265, 263, 273 and 279.

**6. FACILITY DESCRIPTION:** Cumberland County Schools Maintenance Department is composed of General Maintenance, Mechanical Maintenance, and Energy & HVAC.

The General Maintenance Department provides maintenance and repair for: building interior and exterior finishes, windows, locks and roofing, and furniture and grounds.

The Mechanical Maintenance Department provides maintenance and repair for: electrical, smoke/fire alarms, plumbing, welding, and vehicles (excluding buses).

The Energy Department is responsible for Energy Management, Utility Management, and HVAC building controls. The HVAC Department is responsible for the operation of all heating and air conditioning equipment.

The Transportation Department provides transportation for approximately 26,000 students to and from their school each day. They maintain over 460 buses which travel more than 25,000 miles daily.

## 7. **ITEMS FOR REVIEW AND INSPECTION - REQUIRED:**

- **Notification - EPA Form 8700-12:** The current information in the EPA database indicates that Cumberland County School Maintenance operates as a Small Quantity Generator. The EPA data base indicates another ID number for this site as well as NCD986230126. Number NCD986230746 was originally issued in 1990 with the address Hwy 301 S. In a discussion with Ray Strawbridge in the Raleigh office, it was determined that the NCD986230746 number will be deactivated and only NCD986230126 should be used for the site since all property is contiguous.
- **Hazardous Waste Manifests:** The 2015 manifests were reviewed on the day of the inspection.  
Safety Kleen, EcoFlo, Noble Oil, and Cleanlites are transporters for the facility's various waste streams.

## 8. **INSPECTION SUMMARY:**

### **RECORDS REVIEW:**

**Weekly Inspections (HW Storage Area):** The facility accumulates but does not normally store hazardous waste on-site (as a generator of that HW). Weekly inspection records were not reviewed but they are required if hazardous waste is stored.

**Emergency Preparedness:** Example letters of arrangements with local authorities will be sent to Mr. Royal via email.

**Emergency Action Plan:** The required emergency information was posted next to the telephone. A copy of our example information to be posted will be sent to Mr. Royal via email.

**Personnel Training:** RCRA training is required for SQG's of hazardous waste but it is not required to be documented. I recommend that you document any hazardous waste training given to employees annually.

### **PHYSICAL INSPECTION/FACILITY WALK-THROUGH:**

The maintenance activities for Cumberland County Schools are performed by Departments whose activities are spread through three separate buildings located on one campus.

**Primary Office Building/Warehouse:** This building houses most of the administrative office space for the Maintenance Department as well as warehouse space for the operation. The Mechanical Maintenance Department accumulates and stores its universal waste lamps in this building and, at the time of inspection, there were 18 boxes of lamps waiting to be shipped (see photo next page). Some of the boxes were open since they were not full and being added to and none of the containers were properly labeled or marked clearly with one of the following phrases: "Universal Waste—Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)." I recommended that all containers stay closed unless adding or removing lamps and that the containers be marked with an accumulation start date. It is important to note that the facility was able to demonstrate the length of time the lamps had been on site by showing the last manifested shipping date.



Universal Waste Lamps

**School Bus Maintenance Building:** This building is a large automotive type shop which is used to conduct all of the maintenance on the County's school bus fleet with the exception of painting. The neat and orderly facility generates used oil, batteries, and parts washer waste which are all generated from vehicle maintenance processes. Used oil is accumulated in a properly labeled tank, filters are hot drained and recycled, and batteries are neatly stacked for recycling. The parts washer solvents used were non hazardous with a high flash point. The only matter which was discussed as an issue of possible noncompliance was the disposal of empty aerosol cans. I recommended that the facility begin accumulation of cans and obtaining a can puncture device for the management of this waste stream.

**Grounds Maintenance/Facility Paint Shop:** These two older building house a small shop to maintain grounds maintenance equipment as well as paint for building maintenance. The same recommendation was made for the empty aerosol cans. A tank located behind the building was not properly labeled with the words "used oil."



Tank not labeled "used oil"

Across the lot was the paint room. There were two 55 gallon drums used to accumulate paint related waste, one drum for latex and one for oil based. The containers were not

labeled and I recommended that both be labeled, the oil based should contain the words “hazardous waste.” I also recommended that both containers be properly closed when waste was not being added.



Drums open and unlabeled

#### 8. ACTION ITEMS / RECOMENDATIONS:

Label all containers and tanks which contain used oil with the words “Used Oil.”

Begin accumulation of “empty” un-punctured aerosol cans to be properly managed.

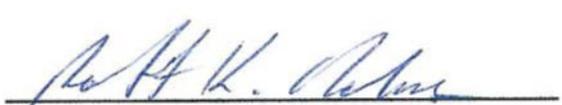
Close, properly label, and date all containers of universal waste lamps.

Label the two 55 gallon drums used to accumulate paint related waste in the paint shop. The latex drum can be labeled “non-hazardous waste” but the oil based drum should be labeled “hazardous waste.” Close each of these containers.

Use the checklist and example documents attached to my email to assure all requirements have been met.

Send out arrangement letters to the local Police, Fire Dept., and Hospital as required. Send these letters certified mail or hand deliver so you can document your attempt to notify.

\*\*\*This visit was a Compliance Assistance Visit. You can expect an unannounced Compliance Evaluation Inspection sometime in the coming weeks.\*\*\*



Robert K. Nelms  
Environmental Senior Specialist

**Date: February 15, 2016**

**Emailed to Mike Royal and Al Miller**  
Facility Contact

**Date: February 15, 2016**