

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

**Your Name:** Heather Goldman

**Facility ID Number:** NCD981863012

**Facility Name:** Transcontinental Gas Pipe Line Company, LLC

**Document Group:** Inspection/Investigation (I)

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**Author(s) of Document:** Heather Goldman

**Inspector ID #:** NC111

**Suborganization:** Western Region

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

**N.C. DEPT OF ENVIRONMENTAL QUALITY  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH**

**RCRA INSPECTION REPORT**

1. **Facility Information:** Transcontinental Gas Pipe Line Company, LLC  
Compressor Station 150  
236 Transco Road  
 Mooresville, N.C. 28117, Iredell County  
**NCD 981 863 012, SQG, TSD Facility**
2. **Facility Contact:** Mr. Tye Ragle, District Manager  
704-892-7631 ext. 2222
3. **Survey Participants:** Mr. Tye Ragle, District Manager; Mr. Dale Burgess, Coordinator of Maintenance; Chris Willard, Operations Supervisor; Mary Siedlecki, HWS-FMB; Heather Goldman, HWS
4. **HWS-Inspector:** Mr. Heather Goldman, HWS-Environmental Senior Specialist
5. **Date of Inspection:** March 9, 2016  
**Date of Report:** March 14, 2016 – Prepared By: Heather Goldman (Inspector)
6. **Purpose of Inspection:** To Determine Compliance with 40 CFR Parts 260-279 & Compliance with Administrative Order in Lieu of Post-Closure Permit
7. **Facility Description:** Williams Transco Gas Pipe Line Company-Compressor Station 150 operates several natural gas pipelines that originate in the Gulf of Mexico and extend along the East Coast into the New England area. The facility inspected is located in Mooresville, NC. This facility is a transmission station. The facility is classified as a Small Quantity Generator (SQG) but primarily operates as a Conditionally Exempt Small Quantity Generator (CESQG). The facility currently has 20 employees and is located on a 25-acre tract of land. The facility operates 24-hours, seven days a week.

The facility generates waste natural gas filters, waste batteries, paint waste, used oil, and universal waste lamps. The facility's primary hazardous waste stream is used natural gas filters. The filters are generated from transfer pump units. The facility contracts with Rental Uniform Service for collection and laundering of used oil wipes. The facility does not generate solvent contaminated wipes.

The facility operates a storm water collection system. Storm water from secondary containment areas around pump buildings is collected in an 8,800-gallon above ground storage tank. The water is filtered through a system to remove small concentrations of PCBs and then pumped to two 4,000-gallon above ground tanks. The water is tested for PCBs and sent to FCC Environmental in Concord, NC for further treatment and discharge to the City of Concord. The water is also picked up by Veolia based out of Mauldin, SC. The process generates waste filters that are non-hazardous and handled in accordance with TSCA regulations if necessary. The facility periodically conducts remediation of soils and other materials that were impacted by leaking compressor oil pumps, at various sites on the property. Some of the oil that leaked contained PCBs.

The facility closed a surface impoundment in September of 1991. The impoundment was used to dispose of petroleum waste generated from operation and maintenance activities at the facility. An Administrative Order on Consent was signed on May 19, 1988 and the facility is currently operating under an Administrative Order in Lieu of Post-Closure Permit. The December 2014 Sampling Analysis Plans notes eleven SWMU-1 monitoring wells and seven SWMU-13 monitoring wells are sampled. Elevated levels of iron and manganese are found in ground water down-gradient of SWMU-1. A ground air injection/sparging system is in place but has not been in operation for some time.

- **Waste Type:**

D018, Hazardous Waste Solid (benzene)  
D008, Hazardous Waste Solid  
D008, U144, Waste Lead Acetate

8. **Areas of Inspection:**

**Manifests:** Manifests were reviewed for waste generated since the last inspection on July 1, 2015. All manifests were in good order and documented approved transporters and TSD facilities. LDR forms were also available. The last shipment was 120 pounds of D018 waste on May 20, 2015.

Transporters: Veolia ES Tech Solutions – NJD 080 631 369  
Freehold Cartage, Inc. – NJD 054 126 164

TSD Facilities: Veolia ES Tech Solutions, LLC – NCD 986 166 338

**Waste Minimization:** The facility provided a written waste minimization plan that was dated as August 1, 2008. The plan describes waste minimization efforts, management support, cost allocation, waste minimization assessments; and technology transfers.

**Weekly Inspections:** The facility conducts and documents weekly inspections at the facility's hazardous waste storage building. Inspections were reviewed for July 2015 through present.

**Emergency Preparedness:** Mr. Tye Ragle is the facility's primary emergency coordinator and Mr. Chirs Waddell is the facility's alternate emergency coordinator. The facility maintains fire extinguishers, firefighting equipment, and eye wash stations. The facility has an internal PA system for emergency notification. The hazardous waste storage area is equipped with a two-way radio for emergency communications. The facility is operated to minimize the possibility of fire or releases. Emergency arrangements with local authorities have been made through arrangement request letters sent certified mail on July 1, 2015. The facility sent certified letters to Mount Mounre Volunteer Fire Department, Iredell County Sheriff's Department, and Lake Norman Regional Medical Center.

**Training:** The facility conducts annual hazardous waste training for all employees working at the facility. The facility has moved to an internet based training program that was provided to 20 of the facility's employees. A training outline was available which includes all necessary topics, such as waste minimization, types of waste, labeling, transportation, recordkeeping, and reporting. Job titles and job descriptions were available for each employee trained in hazardous waste handling/management.

**Contingency Plan:** The facility maintains a SPCC and evacuation plan in the break room. The facility's contingency plan has been updated to contain information that is required of a SQG contingency plan. The plan is kept in the storage shed and employee training room, and list emergency response agency contacts, emergency equipment, and spill kits.

**Biennial Report:** The facility submitted their 2015 Biennial Report on February 13, 2016. The plan was reviewed at the time of the inspection. The facility generated the following amounts of hazardous waste during 2015:

D008, 45-pounds  
D018, 174-pounds of spent gasoline filters  
D008, U144, 3-pounds of waste lead tape

**Accumulation Areas:** The facility maintains one satellite accumulation container located in the Measurement Lab Building. This building remains locked and houses a sulfur analyzer that generates a waste lead acetate tape. At the time of inspection there was one 5-gallon container in this area that was closed and labeled.

**Hazardous Waste Storage Areas:** This area is located in the middle of the facility. The area is in a closed building that also contains a variety of other waste and non-waste materials including gasoline and hydraulic fluid. There was one 55-gallon container of hazardous waste used filters in storage located inside of a concrete secondary containment floor. The container was closed, labeled and dated as 1/21/2016. The facility maintains a waste

generation log that tracks dates and the amounts of waste added to the containers. The area is labeled with a "Hazardous Waste Storage Area" sign and a "No Smoking" sign. A fire extinguisher, two-way radio, and spill control kit are also located in the storage area.

Hazardous Waste Units and Documentation: The facility is operating under an Administrative Order in Lieu of Post-Closure Permit that was executed on August 26, 2014. Prior to August 26, 2014 the facility was operating under a Post Closure Care Plan, Revision 5, dated January 2000 and approved February 8, 2000. The facility should maintain the January 2000 revised Post Closure Plan onsite for future reference. The facility maintains the August 26, 2014 Administrative Order in Lieu of Post-Closure Permit onsite. The facility also conducts and documents quarterly and post storm cap integrity, security equipment and monitoring well inspections.

The facility also operates under a Sampling and Analysis Plan dated December 2014. This document is maintained onsite. The groundwater-monitoring plan and all quarterly cap inspection requirements were up to date at the time of the inspection. The last sampling event was September 2 & 3, 2015. The October 2015 annual Groundwater Monitoring Report was available for review at the time of the inspection.

During the inspection the closed units and monitoring wells were visually inspected. All monitoring wells were locked and appeared to be in good condition at the time of the inspection. The vegetative cover on the cap was adequate and erosion problems were not noted on the closed cap. A chain link fence, that remains locked at all times, surrounds the facility. **The facility is reminded that all groundwater wells should be marked with identifying information per 15 NCAC 02C .0108(o).**

The following financial assurance information was available:

Method: Financial Test

Amount: \$295,280

Date Submitted: June 5, 2015

Used Oil and Universal Waste: There is a 3000-gallon used oil tank and a 55-gallon used oil tank at the facility. Used oil is generated from maintenance activities on engines and pumps used in the natural gas transmission process. The tanks were both properly labeled and receipts were available documenting proper disposal through Heritage Crystal Clean.

The facility generates used lamps and used batteries. Universal waste is stored in the hazardous waste storage area. There were four boxes of used fluorescent lamps in storage. There was one 5-gallon container of used batteries that was closed and labeled. The containers were properly labeled and closed at the time of the inspection. Universal waste, including mercury containing devices, is sent to Veolia ES Tech Solutions for recycling. **The facility is reminded that Universal Waste may be stored onsite for no greater than one year (365-days).**

**10. Site Deficiencies:**

- No violations cited.

  
INSPECTOR (DATE)

SENT via E-MAIL  
FACILITY CONTACT

ec: Tye Ragle, Transcontinental Gas Pipeline  
Brent Burch, Compliance Branch Head  
Mary Siedlecki, NC HWS-FMB  
Central Office Files