

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

Your Name: Heather Goldman

Facility ID Number: NCD986216281

Facility Name: AGI Fuel Farm Charlotte Airport

Document Group: General (G)

Document Type: G - Compliance Assistance Visit (CAV)

File Description/Comments: CAV. Deficiencies to be addressed through technical assistance.

Date of Document: 2/4/2016

Author(s) of Document: Heather Goldman

Inspector ID #: NC111

Suborganization: Western Region

County (if not on report): Mecklenburg

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

**SMALL QUANTITY GENERATOR (SQG)
COMPLIANCE ASSISTANCE VISIT (CAV) REPORT**

1. FACILITY INFORMATION:

Name: AGI Fuel Farm Charlotte Airport
EPA ID Number: NCD 986 216 281
Type of Facility: Large Quantity Generator (LQG)
Facility Location: 6502 Old Dowd Road, Charlotte NC 28208
Facility Address: 4700 Yorkmont Road, Suite 202, Charlotte, NC 28208
Telephone Number: 704-392-4351
County: Mecklenburg

2. AUTHOR OF REPORT: Heather Goldman, Environmental Senior Specialist, NCDEQ
980-224-9858 heather.goldman@ncdenr.gov
Date of Report: March 4, 2016

3. FACILITY CONTACT: Jimmy Jordan
Office: 704-392-4351

4. SURVEY PARTICIPANTS:
Tom Miron – Fuel Systems Manager; Heather Goldman - ESS NCDEQ

5. DATE OF INSPECTION: February 4, 2016

6. PURPOSE OF EVALUATION:

An evaluation to assist in determining compliance with hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA) which are described at Chapter 40 of the Code of Federal Regulations (40 CFR), Parts 260 – 270, 273, and 279; and Title 15 Chapter 13A Hazardous Waste Management Rules (Rules) of the North Carolina Administrative Code (NCAC).

7. DESCRIPTION OF FACILITY:

Aircraft Service International Group (ASIG) - Fuel Farm is a fuel supply facility for Charlotte Douglas International Airport. This site is operated by ASIG. They operate a 5000-gallon oil water separator and the useable material is sent to a reclaim tank which is picked up and recycled by Hazmat Environmental Services. The facility conducts minor maintenance for vehicles and pumps. Larger maintenance projects are contracted out. The facility appeared to be operating as a Conditionally Exempt Small Quantity Generator (CESQG) at the time of inspection.

General Information:

- Legal owner of facility: City of Charlotte
- Legal owner of property: City of Charlotte
- Number of Employees/Shifts: 11 Employees/Operating 24/7
- Water supply (municipal or well): Charlotte Water
- Municipal sewer/septic/on-site treatment facility: Charlotte Water
- Number of on-site wells: 14 Active Monitoring Wells, 1 Inactive Monitoring Well – Well Information System 3.0
- Distance to closest off-site well: On adjacent property

- Closest private residence: Approximately 0.9 miles
- Site Acreage: Approximately 11 acres

8. HAZARDOUS WASTE (HW) GENERATED:

The facility has made no shipments of hazardous waste from this site.

9. AREAS OF REVIEW AND INSPECTION:

- Weekly Inspections (HW Storage Area) – Not required of a CESQG.
- Contingency Plan – Not required of a CESQG. This facility is operated to minimize the possibility of spills and releases. They operate a secure facility where access is restricted. Emergency equipment and communication devices are maintained. All personnel on-site are trained in emergency procedures.
- Training – Training records are not required for CESQG’s or SQG’s. The facility provides their employees with appropriate training pertaining to their job function.
- Hazardous Waste Storage Areas (HWSA) – Currently there is not a hazardous waste storage area on-site.
- Other Materials –
 - Spill pads that are used to absorb spilled jet fuel is sent to Hazmat Environmental Services, whom sends the spill pads to VLS to be used for fuel.
 - The facility generates waste filters from fuel lines that filter out foreign particles. Filters are changed every two to four months. Approximately 14 to 38 waste filters can be generated at each change out. The facility currently manages waste filters as non-hazardous solid waste.
- Used Oil – Used oil that is generated from vehicle maintenance is put into waste fuel oil. Used oil was not observed stored onsite.

Listed below are the site deficiencies noted during the Compliance Assistance Visit. After 30 days your facility is subject to a Compliance Evaluation Inspection (CEI). Any violations found during the CEI will be subject to enforcement. Prior to the CEI visit, the facility may provide documentation to demonstrate compliance with noted site deficiencies to Heather Goldman at Heather.Goldman@ncdenr.gov.

10. SITE DEFICIENCIES:

- 40 CFR 262.11 – The facility failed to conduct a waste determination on waste filters. The facility currently manages waste filters as non-hazardous solid waste and has not provided information to demonstrate the waste filters are non-hazardous.

11. COMMENTS AND RECOMMENDATIONS:

- The facility should refer to the NCDEQ Hazardous Waste Section Technical Assistance Guidance page located at <https://ox.deq.prod.nc.gov/about/divisions/waste-management/waste-management-permit-guidance/hazardous-waste-section-technical-assistance-education-guidance> for more guidance documents, specifically, the Generator Compliance Manual. This document provides examples that will assist as a reference for compliance.

Heather Goldman 3/4/2016
 INSPECTOR (DATE)

By E-Mail
 FACILITY CONTACT

cc: Jimmy Jordan – ASIG Fuel Farm Charlotte Airport
 Brent Burch, Compliance Branch Head
 Central Office Files