

LASERFICHE FILE TRANSMITTAL FORM
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

Your Name: Don Burke

Document Category: Facility

Document Group: Inspection/Investigation (I)

Document Type: Complaint Investigation (CMP)

EPA ID: NCS000002578

Facility Name/Subject: Range Ordinance Cleanup

Document Date: 10/17/2018
(or Inspection Date)

Description:

No violations issued.

Author: Don Burke

Branch/Unit: Compliance Branch-Eastern Region

Facility/Site Address: 114 Market St

Facility/Site City: New Bern

Facility/Site State: North Carolina

Facility/Site Zipcode: 28560

Facility/Site County: Craven

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

COMPLAINT INVESTIGATION REPORT

FACILITY INFORMATION

Facility Name: Range Ordinance Cleanup
EPA ID Number: NCS000002578

Location Address: 114 Market St, New Bern, NC 28560
Craven County

Facility Contact: Matt Snider, Owner
rangeordinancecleanup@gmail.com
252-571-4439

Participants:
Range Ordinance Cleanup: Matt Snider, Branden Wynant (Project Manager;
bwynant.roc@gmail.com)
NCDEQ DWM HWS: Don Burke (No: NC WDB (RCRA-DNE))

Reason for Visit: Complaint Investigation (FCI-CMP)

Date of Site Visit: October 17, 2018 **Onsite:** 0830 hrs **Offsite:** 1130 hrs

COMPLAINT

I, Don Burke of NCDEQ DWM - Hazardous Waste Section, investigated (unannounced) a complaint to determine compliance with NC Hazardous Waste Rules and Laws. The complaint was sent via phone & email from Jeff Menzel and Brent Burch (both of NCDEQ DWM-HWS). The complaint stated that a mobile business “is disposing of lead dust from their mobile lead recovery system into the regular trash.”

FACILITY DESCRIPTION

Range Ordinance Cleanup (ROC) is a mobile business model (covering the entire Continental United States) providing range ordinance cleaning activities at Granulated Indoor Rubber Berm Ranges. Types of shooting ranges include rifle, pistol and shotgun. Clients include: Military Bases, Law Enforcement and Private Ranges. The focus of the business is shooting range management forunjacketed lead bullets (from spent ammunition) and/or lead containing primers that generate lead dust and debris throughout a range. ROC range cleaning of rubber berms aims to satisfy associated safety issues for both human health and potential environmental impacts.

ROC conducts “Indoor Rubber Range Ordinance Cleaning” (which includes the processing of the range rubber - removing the waste and discharging the “good” rubber back to the range). ROC conducts general range cleaning services which minimizes lead dust exposure.

Additional services include: Range Cleaning (Range Floor, Walls, Baffles, Bullet Traps, Shooters Booths, etc.); Changing out air filters (includes utilizing contracted vendors to dispose of used hazardous filters); Provide air monitoring and exposure testing; Provide employee safety plan for lead exposure; Remove all dust and debris from rubber; Remove all lead and lead chip from rubber; HEPA HVAC Filter Replacement.

The ROC Office is located within a Business Park (Magnolia Commons). The ROC business model is a mobile operation across the Continental United States. The business has been at the current location since 2016. Work hours vary with work orders/contracts, but are typically Monday-Friday/8am – 5pm.

INTERVIEW & ADMINISTRATIVE REVIEW

I addressed the complaint (and exchanged contact information) with Matt Snider (Owner) and Branden Wynant (Project Manager). The ROC Staff was very cooperative during the investigation process (including dialogue via phone & email). Areas of dialogue included the business model and past issues with an ex-associate who encroached upon ROC's patent regarding the range clean-up process. ROC Staff have indicated that they are aware, respectful of and abide by all USEPA rules and regulations regarding the RCRA (Resource Conservation and Recovery Act) "cradle to grave" process for hazardous waste. Staff are trained and certified in OSHA and EPA government standards. ROC Staff stated that their clients ensure that any entity providing range clean-up and the subsequent transportation and disposal of any waste streams abide by RCRA Hazardous Waste rules & regulations.

Once the range clean-up process has been completed, arrangements are made for an onsite pick-up by a contracted vendor (with an assigned EPA ID #). ROC does not transport any materials. ROC provided manifests demonstrating consistent transportation and disposal activities. The following clients, transporters and designated facilities (with Land Disposal Restriction forms) were reviewed (from the past two years) and included the following:

Client: Elite Shooting Sports (Manassas, VA); Generator EPA ID #CESQG
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 010410764 FLE
Transporter: Republic Environmental Systems (Trans Group) LLC (EPA ID #PAD982661381)
Transporter #2: N/A
Designated Facility: Republic Environmental Systems (PA) LLC (EPA ID #PAD085690592): **signed & dated by Designated Facility - 1/14/2017**

Client: On Target Range (Crystal Lake, IL); Generator ID #ILR000191429
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 016303218 JJK
Transporter: NORTRU LLC (EPA ID #MID021087275)
Transporter #2: N/A
Designated Facility: Petro Chem Processing Group (EPA ID #MID980615298): **2/20/2017**

Client: The Firing Pin (Bergen, NY); Generator EPA ID #CESQG
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 016314287 JJK
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: NORTRU LLC (EPA ID #MID021087275)
Designated Facility: Petro Chem Processing Group (EPA ID #MID980615298): **5/03/2017**

Client: Eagle Gun Range (Lewisville, TX); Generator EPA ID #CESQG
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 016433707 JJK
Transporter: Philip Reclamation Services (EPA ID #TXD071496338)
Transporter #2: N/A
Designated Facility: Chemical Reclamation Services LLC (EPA ID #TXD046844700): **6/09/2017**

Client: Centerfire Shooting Sports (Olathe, KS); Generator EPA ID #KSR000505222
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 010960524 FLE
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: N/A
Designated Facility: Solvent Recovery LLC (EPA ID #MOD000610766): **7/24/2017**

Client: DEA Aviation Division (Fort Worth, TX); Generator EPA ID #CESQG
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 003422668 GBF
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: Philip Reclamation Services (EPA ID #TXD071496338)
Designated Facility: Chemical Reclamation Services LLC (EPA ID #TXD046844700): **9/12/2017**

Client: The Gun Rack Range (Aiken, SC); Generator EPA ID #CESQG
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 003072638 GBF
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: A.R. Paquette & Company, Inc. (EPA ID #FLD982105884)
Designated Facility: Allworth LLC (EPA ID #ALD094476793): **10/10/2017**

Client: Reno Guns and Range (Reno, NV); Generator EPA ID #CESQG
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 016850319 JJK
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: N/A
Designated Facility: 21st Century Environmental Management of Nevada LLC (EPA ID #NVD980895338): **11/09/2017**

Client: Arkansas Armory (North Little Rock, AR); Generator EPA ID #CESQG
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 016669979 JJK
Transporter: Philip Reclamation Services (EPA ID #TXD071496338)
Transporter #2: N/A
Designated Facility: Chemical Reclamation Services LLC (EPA ID #TXD046844700): **12/08/2017**

Client: The Firing Pin (Bergen, NY); Generator EPA ID #CESQG
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 017484924 JJK
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: N/A
Designated Facility: Petro Chem Processing Group (EPA ID #MID980615298): **2/26/2018**

Client: The Range at Ballantine (Fort Mill, SC); Generator EPA ID #CESQG
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 010770456 FLE
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: Action Resources, Inc. (EPA ID #ALR000007237)
Designated Facility: Allworth LLC (EPA ID #ALD094476793): **4/02/2018**

Client: Evan's Gunsmithing Shooter's World (Orange, CA); Generator EPA ID #CAL000315097
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 000204434 DAT
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: LaChiquita Trucking (EPA ID #CAR000217000)
Designated Facility: RHO CHEM LLC Inglewood, CA (EPA ID #CAD008364432): **4/05/2018**

Client: Arkansas Armory (North Little Rock, AR); Generator EPA ID #CESQG
Waste Stream: Waste Environmentally Hazardous Substances, Solid (Lead) D008
Manifest #: 017833953 JJK
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: N/A
Designated Facility: Chemical Reclamation Services LLC (EPA ID #TXD046844700): **5/24/2018**

Client: Palm Beach Shooting Center (Lake North, FL); Generator EPA ID #CESQG
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 015765424 JJK
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: Freehold Cartage, Inc. (EPA ID #NJD054126164)
Designated Facility: Allworth LLC (EPA ID #ALD094476793): **7/19/2018**

Client: Evan's Gunsmithing Shooter's World (Orange, CA); Generator EPA ID #CAL000315097
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 000213173 DAT
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: Cruz Containers Logistics, Inc. (EPA ID #CAR000217554)
Designated Facility: RHO CHEM LLC Inglewood, CA (EPA ID #CAD008364432): **8/30/2018**

Client: City of Burbank Police Department (Burbank, CA); Generator EPA ID #CA0000360230
Waste Stream: Hazardous Waste Solid (Lead) D008
Manifest #: 000213276 DAT
Transporter: Stericycle Specialty Waste Solutions, Inc. (EPA ID #MNS000110924)
Transporter #2: N/A
Designated Facility: RHO CHEM LLC Inglewood, CA (EPA ID #CAD008364432): **9/11/2018**

CONDITION OF FACILITY:

I observed no areas of concern regarding the business model, location and activities of the mobile entity. The Staff was very cooperative during the investigation process.

CONCLUSION

No adverse conditions or areas of concern were noted or observed. It would appear that this complaint is without merit.

If you have any questions comments or concerns regarding this report or any RCRA (Resource Conservation & Recovery Act) compliance issues, please contact Don Burke at 252-689-1159.



Don Burke
Environmental Specialist II
N.C. Department of Environmental Quality
Division of Waste Management - Hazardous Waste Section

October 19, 2018

Date

Cc: Range Ordinance Cleanup
114 Market St, New Bern, NC 28560
Attn: Matt Snider, Owner (rangeordinancecleanup@gmail.com)

Heather Goldman – Eastern Regional Compliance Supervisor

Central Files: DWM Hazardous Waste Section